

## 3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original draft EIR and are identified by the draft EIR page number. Text deletions are shown in double ~~strike~~through, and text additions are shown in double underline.

The information contained within this chapter clarifies and expands on information in the draft EIR and does not constitute “significant new information” requiring recirculation. (See the Master Response regarding recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

### 3.1 REVISIONS TO CHAPTER 1: INTRODUCTION

To provide clarification, the text of the second paragraph of Section 1.4, “Lead, Responsible, and Trustee Agencies,” on page 1-5 of the draft EIR is revised as follows:

Responsible agencies are agencies other than the lead agency that have discretionary power over carrying out or implementing a specific component of the general plan or for approving a project (such as an annexation) that implements the goals and policies of the general plan. Agencies that may be responsible agencies include: the California Department of Transportation, which has responsibility for approving future improvements to the state highway system; the Department of Conservation, which has responsibility for ~~approving~~ reviewing and commenting on surface mining Reclamation Plans pursuant to the Surface Mining and Reclamation Act and, through its California Geologic Energy Management Division (CalGEM), responsibility for approving oil and gas wells; and the Local Agency Formation Commission of Ventura County, which has responsibility for approving any annexations within the county that might occur over the life of the 2040 General Plan.

### 3.2 REVISIONS TO CHAPTER 2: EXECUTIVE SUMMARY

For consistency, the text of Table 2-4 beginning on page 2-16 of the draft EIR is revised as follows:

**Table 2-4 Summary of Impacts and Mitigation Measures**

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
<p><b>Aesthetics, Scenic Resources, and Light Pollution</b></p>			
<p><b>Impact 4.1-1: Physically Alter a Scenic Resource that is Visible from a Public Viewing Location</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.1-2: Substantially Obstruct, Degrade, Obscure, or Adversely Affect the Character of a Scenic Vista that is Visible from a Public Viewing Location</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.1-3: Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network</b></p>	<p>PS</p>	<p><b>Mitigation Measure AES-1: New Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Roadway Network Roadways</b>                      The County shall include the following new implementation program in the 2040 General Plan.  <u><b>Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Road Network Roadways</b></u>  <u>Applicants for future discretionary development projects that include use of reflective surfaces such as metal, glass, or other materials that could produce glare and that the County determines would potentially be visible to motorists traveling along one or more RRN roadways shall submit a detailed site plan and list of project materials to the County for review and approval. If the County determines that the project would include materials that would produce disability or discomfort glare for motorists traveling along one or more RRN roadways then the County will either require the use of alternative materials, such as high-performance tinted non-mirrored glass, painted (non-gloss panels), and pre-cast concrete or fabricated textured wall surfaces, or require that the applicant submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a luminance histogram, which consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies the brightness level of different sections of that scene, from darkest to brightest. Glare impacts from future projects would be considered significant when the glare source to the median of the background ration exceeds 3:1 in a luminance histogram.</u></p>	<p>LTS</p>
<p><b>Impact 4.1-4: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>

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<p><b>Agriculture and Forestry Resources</b></p>													
<p><b>Impact 4.2-1: Loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance</b></p>	<p>PS</p>	<p><b>Mitigation Measure AG-1: New Policy AG-X: Avoid Development on Agricultural Land</b>                      The County shall include the following new policy in the 2040 General Plan.  <b>Policy AG-X: Avoid Development on Agricultural Land</b>  <u>The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible.</u></p> <p><b>Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement</b>                      The County shall include the following new implementation program in the 2040 General Plan.  <b>Implementation Program AG-X: Establish an Agricultural Conservation Easement</b>  <del>Applicants for d</del><u>Discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall be required to ensure the permanent protection of offsite farmland of equal quality at a <del>2:4</del> 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. "Offsite" means an area that is outside of the project's permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. Discretionary projects to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement.</u></p> <table border="1" data-bbox="1052 1263 1797 1466"> <thead> <tr> <th>General Plan Land Use Designation</th> <th>Important Farmland Inventory Classification</th> <th>Acres Lost</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Agricultural</td> <td>Prime/Statewide</td> <td>5</td> </tr> <tr> <td>Unique</td> <td>10</td> </tr> <tr> <td>Local</td> <td>15</td> </tr> </tbody> </table>	General Plan Land Use Designation	Important Farmland Inventory Classification	Acres Lost	Agricultural	Prime/Statewide	5	Unique	10	Local	15	<p>SU</p>
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		<p><u>If the Planning Division, in consultation with the Agricultural Commissioner, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall prepare and submit a report for the review and approval of the Planning Division in consultation with the Agricultural Commissioner which identifies a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of <del>an</del> one or more offsite agricultural conservation easements. The preservation of more than one site agricultural conservation easement may be considered in order to meet the required number of acres. The applicant shall also deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and Agricultural Commissioner regarding the establishment and implementation of the agricultural conservation easement(s). The contents of the report shall be determined, reviewed, and approved by the Planning Division in consultation with the Agricultural Commissioner (hereafter referred to as the "reviewing agencies"), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the conservation easement (e.g., a land trust organization) to determine the viability of the proposed mitigation site(s) for the establishment of a permanent agricultural conservation easement.</u></p> <p><u>Among the factors necessary for approval by the reviewing agencies, the proposed mitigation site(s) shall be located in the County of Ventura unincorporated area, must not already have permanent protection, <del>and</del> must be equivalent to or greater than the type of Important Farmland</u></p>												

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		<p>(e.g., Unique farmland) that would be converted by the project, and must be of sufficient size to be viable for long term farming use as determined by the County. Among other terms that may be required by the reviewing agencies in consultation with a qualified entity, the terms of an agricultural conservation easement shall include a requirement that it run with the land. There must also be a provision for annual monitoring by the qualified entity or its representative to ensure adherence to the terms of the conservation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance for inauguration of the project.</p>	
<b>Impact 4.2-2: Result in Classified Farmland Near Any Nonagricultural Land Use or Project</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.2-3: Conflict with Williamson Act Contracts or Agricultural Preserves</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.2-4: Conflict with Land Zoned as Forestland, Timberland, or Timberland Production Zone</b>	LTS	No mitigation is required for this impact.	LTS
<b>Air Quality</b>			
<b>Impact 4.3-1: Conflict with or Obstruct Implementation of the 2016 Ventura County Air Quality Management Plan</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.3-2: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed VCAPCD-Recommended Thresholds</b>	PS	<p>Mitigation Measure AQ-1a: New Policy HAZ-X: Construction Air Pollutant Best Management Practices            The County shall include the following new Policy HAZ-X in the 2040 General Plan.</p> <p><b><u>Policy HAZ-X: Construction Air Pollutant Best Management Practices</u></b>  <u>Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality</u></p>	SU

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		<p><u>Assessment Guidelines or otherwise to the extent applicable to the project.</u></p> <p><del>The County shall ensure that discretionary development will, to the extent feasible, incorporate best management practices (BMPs) to reduce emissions to be less than applicable thresholds. These BMPs include but are not limited to the most recent VCAPCD recommendations for construction BMPs (per the Air Quality Assessment Guidelines or as otherwise identified by VCAPCD).</del></p> <p>Mitigation Measure AQ-1b: New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices                      The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices</u></b></p> <p><del>Applicants for future discretionary development projects that would generate construction-related air emissions that exceed applicable thresholds, will shall be required to include, but are not limited to, the following types of emission reduction mitigation measures and potentially others, as recommended by VCAPCD (in its Air Quality Assessment Guidelines Guidance or otherwise), to the extent feasible and applicable to the project as determined by the County. The types of measures shall include but are not limited to: maintaining equipment per manufacturer specifications; lengthening construction duration to minimize number of vehicle and equipment operating at the same time during the summer months; use of Tier 3 at a minimum, or Tier 4 if commercially available diesel engines in all off-road construction diesel equipment, at a minimum; and, if feasible<sup>1</sup> using electric-powered or other alternative fueled equipment in place of diesel powered equipment (whenever feasible).</del></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set</u></p>	

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		<p>forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines section 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</p> <p>Mitigation Measure AQ-2a: New Policy HAZ-X: Fugitive Dust Best Management Practices</p> <p>The County shall include the following new policy in the 2040 General Plan.</p> <p><b><u>Policy HAZ-X: Fugitive Dust Best Management Practices</u></b>                      The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, <del>to the extent feasible,</del> incorporate appropriate BMPs <del>that</del> to reduce emissions to be less than applicable thresholds.</p> <p>Mitigation Measure AQ-2b: New Implementation Program HAZ-X: Fugitive Dust Best Management Practices</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program HAZ-X: Fugitive Dust Best Management Practices</u></b>  <del>Applicants for future</del> Discretionary development projects that which will generate construction-related fugitive dust emissions <del>that exceed applicable thresholds will</del> shall be required by the County to include, <del>but are not limited to,</del> the types of mitigation dust reduction measures recommended by VCAPCD's in its Air Quality Assessment Guidelines, or otherwise, <del>to the extent feasible and applicable</del> such as:</p> <ul style="list-style-type: none"> <li>▶ <del>The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.</del></li> <li>▶ The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.</li> <li>▶ Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of watering (preferably reclaimed,</li> </ul>	

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		<p>if available) should penetrate sufficiently to minimize fugitive dust during grading activities.</p> <ul style="list-style-type: none"> <li>▶ <u>Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:</u> <ul style="list-style-type: none"> <li>▪ <u>All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.</u></li> <li>▪ <u>All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.</u></li> </ul> </li> <li>▶ <u>Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.</u></li> <li>▶ <u>Signs shall be posted on-site limiting traffic to 15 miles per hour or less.</u></li> <li>▶ <u>During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with VCAPCD when winds are excessive.</u></li> <li>▶ <u>Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.</u></li> <li>▶ <u>Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in</u></li> </ul>	



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		<p><u>accordance with California Division of Occupational Safety and Health regulations.</u></p>	
<p><b>Impact 4.3-3: Result in a Net Increase in Long-Term Operational Criteria Air Pollutant and Precursor Emissions That Exceed VCAPCD-Recommended Thresholds</b></p>	<p>PS</p>	<p>No feasible mitigation is available for this impact beyond the policies and implementation programs included in the 2040 General Plan. Refer to Impact 4.3-3 in Section 4.3, "Air Quality," for explanation.</p>	<p>SU</p>
<p><b>Impact 4.3-4: Result in a Short- or Long-Term Increase in Localized CO Emissions That Exceed VCAPCD-Recommended Thresholds</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.3-5: Expose Sensitive Receptors to Substantial Increases in Toxic Air Contaminant Emissions</b></p>	<p>PS</p>	<p>Mitigation Measure AQ-3: New Policy HAZ-10.X: <del>Setback Requirements</del> <u>Health Risk Assessments</u> for Sensitive Land Uses Near Heavily Traveled Transportation Corridors                      The County shall include the following new policy in the 2040 General Plan.  <b><u>Policy HAZ-10.X: <del>Setback Requirements</del> Health Risk Assessments for Sensitive Land Uses Near Heavily Traveled Transportation Corridors</u></b>                      The County shall require discretionary development for land uses <del>which include sensitive receptors which are considered to be (populations or uses that are more susceptible to the effects of air pollution than the general population, such as long term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds)</del> <u>are be located at least 500 1,000 feet from any freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural roads that exceed 50,000 vehicles per day. New sensitive receptor use structures can be located within 500 1,000 feet from a new or existing freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural road with traffic volumes that exceed 50,000 vehicles per day only if a project applicant first prepares a qualified, site-specific health risk assessment (HRA). The HRA shall be conducted in accordance with guidance from VCAPCD and approved by VCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million, then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. No further action shall be required if the HRA demonstrates that the level of cancer risk would be less than 10 in 1 million. Project design</u></p>	<p>LTS</p>

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		<p>features that may be considered in an HRA may include, but are not limited to: installing air intakes furthest away from the heavily traveled transportation corridor; installing air filtration (as part of mechanical ventilation systems or stand-alone air cleaner); using air filtration devices rated MERV-13 or higher; requiring ongoing maintenance plans for building HVAC air filtration systems; limiting window openings and window heights on building sides facing the heavily traveled transportation corridor; or permanently sealing windows so they don't open on the side of the building facing the heavily traveled transportation corridor; and installing vegetative barriers, considering height and cover thickness, to create a natural buffer between sensitive receptors and the emissions source. For purposes of this policy, "sensitive receptors" means populations or uses that are more susceptible to the effects of air pollution than the general population such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds.</p>	
<p><b>Impact 4.3-6: Result in Other Emissions (Such as those Leading to Odors) Adversely Affecting a Substantial Number of People</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Biological Resources</b></p>			
<p><b>Impact 4.4-1: Disturb or Result in Loss of Special-Status Species and Habitat</b></p>	<p>PS</p>	<p>Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources                      The County shall include the following new implementation program in the 2040 General Plan.  <del>Implementation Program COS-X: Protection of Sensitive Biological Resources</del>                      The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:                      The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special status plant, special status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within</p>	<p>SU</p>

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		<p><del>the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the County and California Coastal Commission, and database searches of the CNDDDB and the CNPS Inventory of Rare and Endangered Plants of California.</del></p> <p><del>The qualified biologist shall conduct a reconnaissance level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.</del></p> <p><del>If the reconnaissance level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures.</del></p> <p><del>If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance level survey, then the following measures shall apply:</del></p> <p><del><b>Special Status Species</b></del></p> <p><del>If special status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol level surveys for those species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.</del></p> <p><del>If special status species are identified during protocol level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts.</del></p> <p><del>If impacts on special status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to</del></p>	

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		<p><del>commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation, generally at least a 1:1 ratio. Compensation may include purchasing credits from a USFWS or CDFW approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.</del></p> <p><del>Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors</del></p> <p><del>If sensitive habitats, wetlands, other non wetland waters, native wildlife nursery sites, and wildlife corridors are identified within or adjacent to the project footprint, these features shall be avoided, if feasible, by implementing no disturbance buffers around sensitive habitats, wetlands, other non wetland waters, or native wildlife nursery sites, and avoiding development within wildlife corridors or implementing project-specific design features (e.g., wildlife friendly fencing and lighting) within wildlife corridors, such that direct and indirect adverse effects of project development are avoided.</del></p> <p><del>A delineation of aquatic habitat within a project site (including waters of the United States and other waters including those under State jurisdiction) including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetlands or other water features identified within or adjacent to the project footprint.</del></p> <p><del>If impacts to sensitive habitats, wetlands, other non wetland waters, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project proponent shall obtain required regulatory authorization (e.g., Section 404 permits for impacts to waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts to aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 4602, a coastal development permit for impacts to ESHA), and shall compensate for unavoidable losses of these resources. Compensation may include restoration of sensitive habitats, wetlands, other non wetland waters, native wildlife nursery sites, and wildlife corridors within or outside</del></p>	

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		<p><del>of the project site, preserving the aforementioned resources through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function, or purchasing credits at an existing authorized mitigation bank or in lieu fee program. The County shall require restoration or compensation for loss of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors at a minimum of a 1:1 ratio or "no net loss."</del></p> <p><u>Implementation Program COS-X: Protection of Sensitive Biological Resources</u>  <u>For any future discretionary development project that could potentially impact sensitive biological resources, the project shall be evaluated pursuant to the methodology described in the Ventura County Initial Study Assessment Guidelines which shall be amended within one year of 2040 General Plan adoption to include the following:</u></p> <ul style="list-style-type: none"> <li>▶ <u>A preliminary assessment of the project shall be completed by County staff, in consultation with a qualified biologist, using available mapped biological resource data and aerial imagery to determine if the project has the potential to impact sensitive biological resources in the defined impact area (direct and indirect impacts). County staff will determine if project conditions or mitigation measures can be developed and implemented that would reduce or avoid those impacts to a less than significant level without requiring a more comprehensive biological resource assessment, otherwise known as an Initial Study Biological Assessment. Examples of projects that would not require a biological resource assessment may include but are not limited to: Projects that occur in previously developed areas, if additional vegetation removal is not required or the use may not impact surrounding natural areas; or projects on land consisting of non-native grasslands totaling less than one acre that are completely surrounded by existing urban development (such as urban infill lots).</u></li> <li>▶ <u>If County staff find that the project may adversely affect sensitive biological resources, then a County approved qualified biologist shall prepare a biological resource assessment to assess and mitigate the adverse impacts of the proposed project. The procedures detailed in Step 3 of the County of Ventura Initial Study Guidelines, Biological</u></li> </ul>	

**Table 2-4 Summary of Impacts and Mitigation Measures**

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		<p><u>Resources Chapter, Methodology Section shall be followed to prepare this biological resource assessment.</u></p> <ul style="list-style-type: none"> <li>▶ <u>The biological resource assessment shall be conducted by a County approved qualified biologist that meets the minimum qualifications for biological consultants listed in Attachment 1 to the County of Ventura Initial Study Assessment Guidelines. The qualified biologist shall have expertise in the taxonomic group or species on which the surveys are focused as well as the County’s data review procedures and survey methods recommended by natural resource agencies or commonly accepted standards in the taxonomic group, community, or species (e.g., California Native Plant Society survey protocols).</u></li> <li>▶ <u>The biological field survey area will be determined by the County agency responsible for administering the project with consideration of recommendations from the qualified biologist. The survey area will include all areas of proposed disturbance, including associated equipment or personnel staging areas, and the surrounding area of potential sensitive biological resources that may be indirectly adversely affected by the project. The size of the survey area will be based on the characteristics of surrounding habitat, the potential for sensitive biological resources to occur, and the nature of the project. For example, an infill project within an already developed area may not require a large survey area; however, a development project adjacent to natural habitat may require a larger survey area based on the potential for disturbance. The procedure for delineating the size of the survey area will follow Step 1 of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section.</u></li> <li>▶ <u>Prior to conducting any field surveys, the qualified biologist shall conduct an initial data review to determine the type of sensitive biological resources that may occur within the survey area using the procedures detailed in Step 3 (a) of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section. This will include but not be limited to review of the best available, current data including: vegetation mapping data, mapping data from the County (Locally Important Species, Habitat</u></li> </ul>	

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		<p><u>Connectivity and Wildlife Corridor, Water Protection District data, past biological reports in the area, etc.); National Wetland Inventory Database (NWI); USGS National Hydrographic Dataset; EcoAtlas; and database searches of the US Fish and Wildlife Service Critical Habitat, Environmental Conservation Online System (ECOS) and Information, Planning, and Conservation System (IPaC); California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB); and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California; Audubon Important Bird Areas and Red Lists, Xerces Society, etc.</u></p> <p><b><u>Biological Inventory -Special Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors</u></b></p> <ul style="list-style-type: none"> <li>▶ <u>The biological inventory shall be conducted as detailed in Step 3 (b) Conduct Field Survey and (c) biological inventory, of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section, which includes a general floristic survey of the project impact areas.</u></li> <li>▶ <u>Vegetation communities within the survey area shall be inventoried using the CDFW vegetation classification standards (Manual of California Vegetation) and the most recent version of CDFW vegetation mapping standards "Survey of California Vegetation Classification and Mapping Standards [CDFW, 2019].</u></li> <li>▶ <u>If the initial data review shows a wetland or water occurring within 300 feet (in non-coastal zone) or 500 feet (in coastal zone) from the edge of the proposed disturbance areas, then a qualified biologist shall delineate the aquatic habitat (including waters of the United States and other waters including those under State jurisdiction). A summary of the type of aquatic habitat, primary water source, species diversity, connectivity to off-site habitat or other hydrological features, hydric soils, and hydrophytic vegetation, and the boundary of the feature (based upon the outermost limit of associated vegetation (canopy drip line or scrub line), hydric soils, bank and bed – whichever is greater) shall be included in the biological resource assessment.</u></li> </ul>	

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		<ul style="list-style-type: none"> <li>▶ <u>If the initial data review indicates that sensitive biological resources have the potential to occur within the survey area, a qualified biologist shall conduct additional focused surveys for these species or other protected habitats using the most recently updated protocols recommended by natural resource agencies (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]), or if not available, standards accepted in the professional biological community to survey that taxonomic group, community, or species. If an established protocol is not available for a special-status species then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.</u></li> </ul> <p><b><u>Mitigation for Special-Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors</u></b></p> <ul style="list-style-type: none"> <li>▶ <u>If a sensitive biological resource is identified during field surveys, then the County shall require implementation of mitigation measures at the project level that fully account for the adversely affected resource. To the maximum extent feasible, mitigation measures should adhere to the following priority to reduce adverse impacts of a proposed project to the resource: avoid impacts, minimize impacts, and compensate for impacts.</u></li> <li>▶ <u>Mitigation measures shall be used on a project level basis and be tailored to on site conditions and sensitive biological resources present as follows:</u> <ul style="list-style-type: none"> <li>▪ <u>Priority 1. Avoid of Impacts: Proposed development shall avoid impacts to the maximum extent feasible by not taking certain actions or parts of an action. Projects shall be sited to avoid direct or indirect impacts on the resource, and include measures such as implementing no-disturbance buffers (e.g., nesting bird buffer areas during construction, siting staging areas outside buffer area), or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting in a wildlife corridor), such that indirect adverse effects of project development are avoided.</u></li> </ul> </li> </ul>	



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		<ul style="list-style-type: none"> <li>▪ <u>Priority 2. Minimize Impacts: Proposed development shall be conditioned to minimize adverse impacts by limiting the degree or magnitude of the action and its implementation to less than significant to the maximum extent feasible. Other mitigation measures may include reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.</u> <ul style="list-style-type: none"> <li>• <u>Measures to mitigate the spread of invasive plant species and invasive wildlife species (e.g., New Zealand mudsnail) shall include but will not be limited to: cleaning of equipment, footwear, and clothing before entering a construction site and the identification and treatment of significant infestations of invasive plant species within a project site.</u></li> </ul> </li> <li>▪ <u>Priority 3. Compensate for Impacts: Compensating for the impact can be done by replacing or providing substitute resources or by rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.</u></li> <li>▶ <u>Compensatory mitigation ratios for protected sensitive resources will be established based on the rarity of the resource, quality of affected habitat associated with the resource, temporary and permanent losses to habitat function, the type of mitigation proposed (restoration, enhancement, preservation, establishment), and other requirements associated with state or federal permits. Mitigation ratios will be determined at the project level in consultation with the County, the qualified biologist, and, where applicable, federal or state agencies with jurisdiction over the resource (e.g., CDFW, USACE, USFWS).</u></li> <li>▶ <u>If impacts on a protected sensitive biological resource are unavoidable, then the project proponent shall mitigate for the type of resource as follows:</u> <ul style="list-style-type: none"> <li>▪ <u>Endangered, Rare, Threatened, or Candidate Species: The applicant shall obtain incidental take authorization from USFWS (16 U.S. Code [U.S.C.] Section 1531 et seq.) or CDFW (California Fish and Game Code Sections 2050–2115.5) prior to</u></li> </ul> </li> </ul>	

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		<p><u>commencing development of the project site, apply minimization measures or other conditions required under the incidental take authorization, and shall provide equivalent compensation for the unavoidable losses of these resources, generally at a minimum ratio of 1:1, or greater. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.</u></p> <ul style="list-style-type: none"> <li>▪ <u>Special-Status Species (includes Locally Important Species): The applicant shall provide equivalent compensation for impacts on special-status species by restoring or significantly enhancing existing habitat where the species occurs, acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation.</u></li> </ul> <p>▶ <u>If impacts on sensitive habitats, wetlands, other non-wetland waters, riparian habitats, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project applicant shall:</u></p> <ul style="list-style-type: none"> <li>▪ <u>Federal or State Protected Sensitive Habitats: Obtain the required regulatory authorization (e.g., Section 404 permits for impacts on waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts on aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts on ESHA), and provide equivalent compensation for the unavoidable losses of the above mentioned resources such that there is no net loss.</u></li> <li>▪ <u>Other Protected Sensitive Habitats (includes locally important plant communities, sensitive natural communities, habitat connectivity and wildlife corridors, native wildlife nursery or overwintering sites): Provide compensation for other protected sensitive habitats which may include the restoration, enhancement, or preservation of the aforementioned habitats within or outside of the project site, or the purchasing of credits</u></li> </ul>	

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		<p><u>at an existing mitigation bank or in lieu fee program deemed acceptable by the County Planning Director.</u></p> <ul style="list-style-type: none"> <li>▶ <u>All compensatory mitigation sites shall be protected in perpetuity through a conservation easement (if off-site), or deed restriction (or other comparable legal instrument) if on-site.</u></li> </ul> <p><u>The County shall, in harmonizing the 2040 General Plan with the Ventura County Initial Study Assessment Guidelines, add definitions for the habitat types included in this mitigation measure, including which components are subject to compliance with the County's Local Coastal Program and Coastal Zoning Ordinance versus non-coastal areas.</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p> <p><u>2. "Mitigation, No-Net-Loss" A principle where if a development project cannot avoid the loss of a valued natural resource, the project mitigates the impacts by replacing the impacted habitat with a newly created or restored habitat of the same size and similar functional condition so that there is no loss of ecological functions and values of that habitat type for a defined area. Similar functional condition means the relative ability to support and maintain the same species composition, diversity, and functional organization as the impacted habitat.</u></p>	
<p><b>Impact 4.4-2: Disturb or Result in Loss of Riparian Habitat, Sensitive Plant Communities, ESHA, Coastal Beaches, Sand Dunes, and Other Sensitive Natural Communities</b></p>	<p>PS</p>	<p><b>Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources</b></p>	<p>SU</p>
<p><b>Impact 4.4-3: Disturb or Result in Loss of Wetlands and other Waters</b></p>	<p>PS</p>	<p><b>Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources</b></p>	<p>SU</p>

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Impact 4.4-4: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites	PS	Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources	SU
Impact 4.4-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources	LTS	No mitigation is required for this impact.	LTS
<p><b>Cultural, Tribal Cultural, and Paleontological Resources</b></p>			
Impact 4.5-1: Substantial Adverse Change in the Significance of an Archaeological Resource Pursuant to PRC 5024.1 and CEQA	PS	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation                      The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation</b></p> <p>The County shall require <u>that all</u> discretionary development <u>projects</u> be assessed for potential <u>tribal, cultural, historical, paleontological, and archaeological resources</u> by a qualified professional <u>and shall</u> be designed to <u>protect existing resources, and shall avoid potential impacts to these resources whenever to the maximum extent feasible.</u>  <del>Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of feasible mitigation and/or shall be mitigated by extracting extraction of maximum recoverable data.</del>  <u>Priority shall be given to measures that avoid resources.</u></p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research                      The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b>Implementation Program COS-X: Cultural Records Research</b>  <u>As part of a discretionary application process, project applicants (Ventura County for County projects) shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.</u></p>	SU

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		<p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures                      The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</u></b>                      For discretionary projects, the County shall require the following:</p> <p><u>Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.<sup>1</sup></u></p> <p><u>If determined necessary by the County, an archaeological, or paleontological, and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.</u></p> <p><u>If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p>	

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<p><b>Impact 4.5-2: Substantial Adverse Change in the Significance of a Historic Resource Pursuant to PRC 5024.1 and CEQA</b></p>	<p>PS</p>	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review                      The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy COS-4.7: Cultural Heritage Board Review</b>                      Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board to identify sites of potential archaeological, historical, tribal cultural and paleontological significance, to ensure that all known resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that <del>determine whether</del> a site has potential archaeological, tribal, architectural, or historical significance, <del>and provide this information shall be provided to the County Cultural Heritage Board for evaluation. and recommendation</del> Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making body.</p> <p>Mitigation Measure CUL-3: New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources                      The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b>Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources</b>                      During project-specific environmental review of discretionary development, the County shall define the project's area of potential</p>	<p>SU</p>

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		<p><u>effect for historic buildings and structures. The County shall determine the potential for the project to result in historic resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historic resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG and Cultural Heritage Board Ordinance.</u></p> <p><u>Before altering or otherwise affecting a building or structure 50 years old or older, the project-applicant shall retain a qualified architectural historian according to the Secretary of the Interior Standards, to record it on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building has not previously been evaluated. Its significance shall be assessed by a qualified architectural historian, using the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. For buildings or structures that do not meet PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required.</u></p> <p><u>For a building or structure that qualifies as a historic resource, the architectural historian and the County shall consult to consider measures that would enable the project to avoid direct or indirect impacts to the building or structure. These could include preserving a building on the margin of the project site, using it "as is," or other measures that would not alter the building. If the project cannot avoid modifications to a historic building or structure, the following shall be considered:</u></p> <ol style="list-style-type: none"> <li><u>1) If the building or structure can be preserved on site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.</u></li> <li><u>2) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the</u></li> </ol>	

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		<p><u>standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.</u></p> <p>3) <u>If preservation and reuse at the site are not feasible,<sup>1</sup> the historical building shall be documented as described in item (2) and, when physically and financially feasible,<sup>1</sup> be moved and preserved or reused.</u></p> <p>4) <u>If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible,<sup>1</sup> the historical building shall be documented as described in item (2).</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p>	



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<p><b>Impact 4.5-3: Substantial Adverse Change in the Significance of a Tribal Cultural Resources</b></p>	<p>PS</p>	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review</p> <p>Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy COS-4.1: Tribal, Cultural, Historical, Paleontological, and Archaeological Resources Inventory</b></p> <p>The County shall maintain an inventory of <u>tribal</u>, cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources, <u>including record studies and reports filed with natural history programs, the California Historical Resources Information System and the Native American Heritage Commission.</u></p> <p>Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy COS-4.2a: Cooperation for <del>Tribal</del> Cultural, Historical, Paleontological, and Archaeological Resource Preservation</b></p> <p>The County shall cooperate with cities, special districts, <del>other</del> appropriate organizations, <del>including the Native American Heritage Commission,</del> and private landowners to identify <u>known tribal cultural, archaeological, historical, and paleontological resources.</u> <del>If necessary, the County shall engage in consultation with local tribes and preservation groups, to</del> and preserve the county's <u>tribal cultural,</u></p>	<p>SU</p>

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		<p>historical, paleontological, and archaeological <u>identified resources within the county.</u></p> <p><b><u>Policy COS-4.2b: Cooperation for Tribal Cultural Resource Preservation</u></b>  <u>For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.</u></p>	
<p><b>Impact 4.5-4: Result in Grading and Excavation of Fossiliferous Rock or Increase Access Opportunities and Unauthorized Collection of Fossil Materials from Valuable Sites</b></p>	<p>PS</p>	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory</p> <p>Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-6: New Implementation Program COS-X: Implement Project-Level Security Measures                      The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program COS-X: Implement Project-Level Security Measures</u></b>  <u>During project-level ground disturbance activities for discretionary development, in areas where paleontologically rich sites or tribal cultural resources are known to be present, project sites shall be secured during non-construction hours to ensure that the unauthorized access and the unlawful curation of fossil materials or tribal cultural resources does not occur. Such security measures may include construction fencing,</u></p>	<p>SU</p>

Table 2-4 Summary of Impacts and Mitigation Measures

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable  N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
		<p><u>unauthorized access signage, security lighting, and security cameras. For large-scale development, a security plan may be prepared prior to construction activities to detail security measures and protocol for the project site.</u></p>	
<b>Energy</b>			
<p><b>Impact 4.6-1: Result in the Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources or Conflict with or Impede State or Local Plans for Renewable Energy or Energy Efficiency</b></p>	LTS	No mitigation is required for this impact.	LTS
<b>Geologic Hazards</b>			
<p><b>Impact 4.7-1: Result in Development within a State of California–Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or a County–Designated Fault Hazard Area that Exposes People or Structures to Fault Rupture Hazards or Directly or Indirectly Causes Fault Rupture</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.7-2: Have Potential to Expose People or Structures to the Risk of Loss, Injury, or Death involving Ground-Shaking Hazards</b></p>	N/A	No mitigation is required for this impact.	N/A
<p><b>Impact 4.7-3: Result In Development Within a State of California Seismic Hazards Zone that Exposes People or Structures to Liquefaction Hazards or Directly or Indirectly Cause the Risk of Loss, Injury, or Death Involving Liquefaction</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.7-4: Result in Development that Exposes People or Structures to Landslide or Debris flow Hazards as a Result of Mapped Landslides, Potential Earthquake-Induced Landslide Zones, and Geomorphology of Hillside Terrain or Directly or Indirectly Cause Landslides</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.7-5: Result in Development that Exposes People or Structures to the Risk of Loss, Injury, or Death Involving Soil Expansion or Directly or Indirectly Cause Soil Expansion If Development Is Located within an Expansive Soils Hazard Zone or Where Soils with an Expansion Index Greater Than 20 is Present</b></p>	LTS	No mitigation is required for this impact.	LTS

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<p><b>Impact 4.7-6: Result in Development that Expose People or Structures to the Risk of Loss, Injury, or Death Involving Subsidence or Directly or Indirectly Cause Subsidence If Development Is Located within a Subsidence Hazard Zone</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Greenhouse Gas Emissions</b></p>			
<p><b>Impact 4.8-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment</b></p>	<p>PS</p>	<p>Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential and New Commercial Development</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential and New Commercial Development</u></b></p> <p><u>To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential development construction through amendments to the Ventura County Building Code. This program shall also be extended to include new commercial development building types such as including but not limited to offices, retail buildings, and hotels, where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents. The County shall allow may exempt certain new commercial development to be exempt from these requirements where the County can make upon making findings based on substantial evidence that supports why the use of natural gas is critical to business operations, and that it is not feasible<sup>1</sup> to replace critical appliances or equipment with electricity powered equivalents. This program shall be completed no later than 2023.</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This</u></p>	<p>SU</p>

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		<p><u>definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p> <p>Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program X: Building Energy Saving Ordinance for Industrial Buildings</u></b></p> <p><u>To address GHG emissions associated with electricity consumption by industrial buildings, which were not quantified in the GHG Inventory and Forecasting due to utility privacy rules, the County shall implement a program to adopt a Building Energy Saving Ordinance, no later than 2025, for industrial buildings over 25,000 square feet in size, modeled after the local benchmarking ordinances adopted in other local jurisdictions in California (CEC 2019). The County shall prepare reports showing the energy performance of industrial buildings relative to similar buildings in California and the United States and make these reports available to the public by request. The County, through <del>the</del> its building department shall provide recommendations on energy efficiency retrofits and green building strategies to improve energy performance to property owners and tenants subject to the reporting requirements.</u></p> <p>Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan</p> <p>The County shall not include Implementation Program COS-EE in the 2040 General Plan.</p> <p><b><u>Implementation Program COS-EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.</u></b> Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy</p>	

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		<p>contained in the General Plan and Program EIR. The County shall review such projects to determine whether the following criteria are met:</p> <ul style="list-style-type: none"> <li>Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site;</li> <li>Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and,</li> <li>Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval.</li> </ul> <p>The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.</p> <p>Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).</p> <p>Mitigation Measure GHG-4: New Implementation Program <del>COS-X HAZ-X</del>: Greenhouse Gas Reduction Policy Enhancement Program <u>and Revised Implementation Program COS-CC: Climate Emergency Council</u></p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program <del>COS-X HAZ-X</del>: Greenhouse Gas Reduction Policy Enhancement Program</u></b></p> <p><u>The Climate Emergency Council (CEC) that would be established under COS-CC shall develop recommended subprograms which implement the 52 policies identified in Table 4.8-7<del>8</del> of the draft EIR that do not have associated implementation programs in the 2040 General Plan. Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning</u></p>	

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		<p><del>Commission and Board of Supervisors. This report shall be presented to the Board of Supervisors.</del></p> <p><u>For any additional future policies that may be adopted as part of the County's Greenhouse Gas (GHG) Reduction Strategy (2040 General Plan, Policy COS-10.1), the CEC may recommend new subprograms. The CEC shall demonstrate in the materials submitted to the Board of Supervisors that the proposed subprograms and policies would result in quantifiable GHG emission reductions that further the County's progress towards achieving the 2030, 2040, and 2050 GHG reduction targets and goals established in the 2040 General Plan. The GHG emission reduction policy topics that may be considered and analyzed by the CEC for recommendation to the Board of Supervisors are identified in the Table 4.8-7 and include but are not limited to the following:</u></p> <ul style="list-style-type: none"> <li>▶ <u>Sustainable Technologies:</u></li> <li>▶ <u>Regional Bicycle Infrastructure;</u></li> <li>▶ <u>Funding and Maintenance for Sidewalks;</u></li> <li>▶ <u>Amtrak Service Improvements;</u></li> <li>▶ <u>Routine Use of Alternative Transportation Options;</u></li> <li>▶ <u>Permeable Pavement;</u></li> <li>▶ <u>Facilities for Emerging Technologies;</u></li> <li>▶ <u>Electric Vehicle Charging Stations;</u></li> <li>▶ <u>Neighborhood Electric Vehicles;</u></li> <li>▶ <u>Shared Mobility Operations;</u></li> <li>▶ <u>Sustainable Community Facility Design;</u></li> <li>▶ <u>Energy Efficient Facility Construction, Purchases, Leases, Retrofits, and Expansions;</u></li> <li>▶ <u>Agricultural Waste Reuse;</u></li> <li>▶ <u>Value-Added Alternatives to Waste Disposal;</u></li> <li>▶ <u>Smart Grid Development;</u></li> <li>▶ <u>Consistent Fire Protection Standards for New Development;</u></li> <li>▶ <u>Soil Productivity;</u></li> <li>▶ <u>Incentives for Energy Efficiency;</u></li> <li>▶ <u>Battery Energy Storage Systems;</u></li> <li>▶ <u>Air Pollutant Reduction;</u></li> <li>▶ <u>Air Pollution Impact Mitigation Measures for Discretionary Development;</u></li> <li>▶ <u>Transportation Control Measures Programs;</u></li> </ul>	

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		<ul style="list-style-type: none"> <li>▶ <u>Alternative Transportation Modes;</u></li> <li>▶ <u>Urban Greening;</u></li> <li>▶ <u>Integrated Pest Management Practices;</u></li> <li>▶ <u>Technological Innovation; and</u></li> <li>▶ <u>Renewable Energy Facilities.</u></li> </ul> <p><u>The CEC's recommended GHG reduction subprograms and policies shall be presented to the Planning Commission for review and recommendation to the Board of Supervisors, and then to the Board of Supervisors for consideration and approval, no later than 2025. The Board of Supervisors shall have sole authority to adopt (including as modified) and direct the County's implementation of the subprograms and policies that are developed and recommended by the CEC. Any CEC recommendation that would require amendments to the 2040 General Plan, County ordinances, policies or regulations shall be processed and approved by the County in accordance with all applicable legal requirements.</u></p> <p><del>Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors. This report shall be presented to the Board of Supervisors by 2025.</del></p> <p><u>The County shall also include the following revised implementation program in the 2040 General Plan.</u></p> <p><b><u>Implementation Program COS-CC: Climate Emergency Council</u></b>  <u>The County shall establish a Climate Emergency Council (CEC) by a resolution of the Board of Supervisors to advise the Board of Supervisors on climate action planning and implementation of the Climate Action Plan (CAP) goals, policies, and programs.</u></p> <p><u>The County agency or department responsible for implementation of this program shall draft, administer, and maintain the CEC bylaws. Initial</u></p>	



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		<p><u>establishment of the CEC and its bylaws shall include the following terms, duties, and membership composition:</u></p> <p><u>Term of each member is two years. At the conclusion of a term, a CEC member may be re-appointed or re-selected, as applicable, for a consecutive term by the appointing authority.</u></p> <p><u>Duties of the CEC members include attendance at duly called meetings; review, in advance, of all written material provided in preparation for CEC meetings; serve and participate on committees and/or sub-committees; and contribute to the CEC’s advisory recommendations to the Board of Supervisors;</u></p> <p><u>The officers of the CEC shall be Chairperson and Vice-Chairperson.</u></p> <p><u>Officers shall be elected annually at regular meeting each year by CEC members. Nomination shall be made from the floor. Election shall be by simple majority.</u></p> <p><u>Officers shall serve a one-year term. An officer may be re-elected, but no individual shall serve more than three full consecutive terms in the same office. No member shall hold more than one office at a time.</u></p> <p><u>The Chairperson shall preside at all meetings of the CEC, sign all correspondence, reports, and other materials produced by the CEC, and perform any and all other duties prescribed by the CEC from time to time. The Chairperson may serve as an ex-officio member of all committees.</u></p> <p><u>The Vice-Chairperson shall represent the Chairperson and/or substitute in performance of the Chairperson during their absence.</u></p> <p><u>Membership of the CEC shall be comprised of the following:</u></p> <p><u>One person representing each Supervisorial District who has demonstrated interest in and knowledge of climate action planning shall be nominated by each of the five members of the Board of Supervisors.</u></p>	

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		<p><u>and confirmed by a majority of the Board of Supervisors resulting in a total of five Supervisorial District representatives;</u></p> <p><u>One resident from each of the designated disadvantaged communities identified in the 2040 General Plan who has demonstrated an understanding of their community's needs as well as an interest in and knowledge of climate action planning shall be appointed by a majority of the Board of Supervisors; and</u></p> <p><u>Two additional at-large members who have demonstrated special interest, competence, experience, or knowledge in climate action planning shall be selected by a majority of the CEC members.</u></p> <p><u>Each member is entitled to one vote on each matter submitted to a vote of the CEC.</u></p> <p>Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria</p> <p>Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines</p> <p>Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program</p>	

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<p><b>Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs</b></p>	<p>PS</p>	<p>Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development                      Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings                      Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan                      Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program                      Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria                      Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines                      Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program</p>	<p>SU</p>
<p><b>Hazards, Hazardous Materials, and Wildfire</b></p>			
<p><b>Impact 4.9-1: Create a Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials or Hazardous Waste</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.9-2: Create a Significant Hazard to the Public or the Environment Through the Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials or Hazardous Waste into the Environment</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.9-3: Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of an Existing or Proposed School</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.9-4: Create a Significant Hazard Due to Location on a Site Which is Included on a List of Hazardous Materials Sites</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.9-5: Locate Inconsistent Land Uses Within the Sphere of Influence of Any Airport, or Otherwise Result in a Safety Hazard to People Residing or Working Near an Airport</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>

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<p><b>Impact 4.9-6: Expose People to Risk of Wildfire by Locating Development in a High Fire Hazard Area/Fire Hazard Severity Zone or Substantially Impairing an Adopted Emergency Response Plan or Evacuation Plan or Exacerbate Wildfire Risk</b></p>	PS	<p>No additional feasible mitigation is available for this impact beyond the policies and implementation programs of the 2040 General Plan. Refer to Impact 4.9-6 in Section 4.9 Hazards, Hazardous Materials, and Wildfire for explanation.</p>	SU
<p><b>Hydrology and Water Quality</b></p>			
<p><b>Impact 4.10-1: Directly or Indirectly Decrease the Net Quantity of Groundwater in a Groundwater Basin That Is Overdrafted or Create an Overdrafted Groundwater Basin</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-2: Result in Net Groundwater Extraction That Causes Overdrafted Basins in Groundwater Basins That Are Not Overdrafted or Are Not in Hydrologic Continuity with an Overdrafted Basin</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-3: Result in Any Increase in Groundwater Extraction in Areas Where the Groundwater Basin and/or Hydrologic Unit Condition Is Not Well Known or Documented and There Is Evidence of Overdraft Based upon Declining Water Levels in a Well or Wells</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-4: Degrade the Quality of Groundwater and Cause Groundwater to Exceed Groundwater Quality Objectives Set by the Applicable Basin Plan</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-5: Result in the Use of Groundwater, in Any Capacity, and Would Be Located within 2 Miles of the Boundary of a Former or Current Test Site for Rocket Engines</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-6: Increase Surface Water Consumptive Use (Demand) in a Fully Appropriated Stream Reach, as Designated by SWRCB, or Where Unappropriated Surface Water Is Unavailable</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS
<p><b>Impact 4.10-7: Increase Surface Water Consumptive Use (Demand) Including Diversion or Dewatering Downstream Reaches, Resulting in an Adverse Impact on One or More of the Beneficial Uses Listed in the Applicable Basin Plan</b></p>	LTS	<p>No mitigation is required for this impact.</p>	LTS

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Impact 4.10-8: Degrade the Quality of Surface Water, Causing It to Exceed the Water Quality Objectives Contained in the Applicable Basin Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-9: Cause Stormwater Quality to Exceed Water Quality Objectives or Standards in the Applicable MS4 Permit or Any Other NPDES Permits	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-10: Be Located within 10 to 20 Feet of Vertical Elevation from an Enclosed Body of Water Such as a Lake or Reservoir, Resulting in a Seiche Hazard	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-11: Be Located within about 10–20 Feet of Vertical Elevation from an Enclosed Body of Water Such as a Lake or Reservoir, Resulting in a Seiche Hazard	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-12: Result in Erosion, Siltation, or Flooding Hazards	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-13: Be Located in a Mapped Area of Flood Hazards	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-14: Impact Flood Control Facilities and Watercourses by Obstructing, Impairing, Diverting, Impeding, or Altering the Characteristics of the Flow of Water, Resulting in Exposing Adjacent Property and the Community to Increased Risk of Flood Hazards	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-15: Result in Conflicts With the Ventura County Watershed Protection District's Comprehensive Plan Through Potential Deposition of Sediment and Debris Materials within Existing Channels and Allied Obstruction of Flow; Overflow of Channels during Design Storm Conditions; and Increased Runoff and the Effects on Areas of Special Flood Hazard and Regulatory Channels Both On- and Off-Site, for Projects Not Located within the Ventura County Watershed Protection District's Comprehensive Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-16: Result in Noncompliance with Building Design and Construction Standards Regulating Flow to and from Natural and Man-Made Drainage Channels	LTS	No mitigation is required for this impact.	LTS

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<b>Impact 4.10-17: Be Designed to Meet All Applicable Requirements for Onsite Wastewater Treatment Systems</b>	LTS	No mitigation is required for this impact.	LTS
<b>Land Use and Planning</b>			
<b>Impact 4.11-1: Result in Physical Development That Is Incompatible With Land Uses, Architectural Form Or Style, Site Design/Layout, Or Density/Parcel Sizes Within Existing Communities</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.11-2: Result in Physical Development That Would Divide An Established Community</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.11-3: Cause an Environmental Impact Due To A Conflict With A Regional Plan, Policy, or Program</b>	LTS	No mitigation is required for this impact.	LTS
<b>Mineral and Petroleum Resources</b>			
<b>Impact 4.12-1: Result in Development on or Adjacent to Existing Mineral Resources Extraction Sites or Areas Where Mineral Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Extraction of the Resources</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.12-2: Result in the Loss of Availability of a Known Mineral Resource That Would Be of Value to the Region and the Residents of the State</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.12-3: Result in Development on or Adjacent to Existing Petroleum Resources Extraction Sites or Areas Where Petroleum Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Access to the Resources</b>	PS	<p>Mitigation Measure PR-1: Revised Policy COS-7.2: Oil Well Distance Criteria                      The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>COS-7.2: Oil Well Distance Criteria</b>                      The County shall require that new discretionary oil <del>and gas</del> wells to be located be sited a minimum of 1,500 feet from the well head to residential dwellings dwelling units and 2,500 from any school sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines.</p>	SU

Table 2-4 Summary of Impacts and Mitigation Measures

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
<p><b>Impact 4.12-4: Result in the Loss of Availability of a Known Petroleum Resource That Would Be of Value to the Region and the Residents of the State</b></p>	<p>PS</p>	<p>Mitigation Measure PR-2: Revised Policy COS-7.7: Limited Conveyance for Oil and Produced Water                      The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy COS-7.7: Limited Conveyance for Oil and Produced Water</b>                      The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, <u>if feasible</u><sup>1</sup>; <del>oil and produced water shall not be trucked.</del> <u>Trucking of crude oil and produced water may only be allowed if the proponent demonstrates, subject to approval by the County, that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p> <p>Mitigation Measure PR-3: Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal                      The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal</b>                      The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, <u>if feasible</u><sup>1</sup>. <del>Flaring or venting shall</del> <u>may only be allowed if the proponent demonstrates, subject to approval by the County, that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency or and for testing purposes consistent with federal, State, and local regulations.</u></p>	<p>LTS</p>

**Table 2-4 Summary of Impacts and Mitigation Measures**

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
		<p>1. <u>“Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p>	
<p><b>Noise and Vibration</b></p>			
<p><b>Impact 4.13-1: Expose Sensitive Receptors to Construction Noise Levels That Exceed Applicable Standards</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.13-2: Expose New Sensitive Land Uses to Traffic Noise</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.13-3: Expose Existing Sensitive Receptors to Traffic-Noise Increases</b></p>	<p>PS</p>	<p>Mitigation Measure NOI-1: New Policy HAZ-X: Implement Noise Control Measures for Traffic Noise                      The County shall include the following new policy in the 2040 General Plan.  <u><b>Policy HAZ-X: Implement Noise Control Measures for Traffic Noise</b></u>  <u>The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist:</u>  <u>The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ-9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or,</u>  <u>The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ-9.2.</u></p>	<p>SU</p>



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		<p>Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fair share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible<sup>1</sup> noise reduction measures shall be implemented to ensure the development's fair share of traffic-generated noise is reduced, consistent with Policy HAZ-9.2.</p> <p>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</p>	
<b>Impact 4.13-4: Expose Noise-Sensitive Land Uses to Operational Stationary Noise That Exceeds Applicable Standards</b>	LTS	No mitigation is required for this impact.	LTS
<b>Impact 4.13-5: Expose Noise-Sensitive Land Uses to Airport Noise That Exceeds the Standards in the Ventura County Airport Comprehensive Land Use Plan</b>	N/A	No mitigation is required for this impact.	N/A
<b>Impact 4.13-6: Expose Sensitive Receptors to Construction Vibration Levels That Exceed Applicable Standards</b>	PS	<p>Mitigation Measure NOI-2: Revised Policy HAZ-9.2: Noise Compatibility Standards            The County shall include the following revised policy in the 2040 General Plan.</p> <p><b>Policy HAZ-9.2: Noise Compatibility Standards</b>            The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:</p> <ol style="list-style-type: none"> <li>1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise</li> </ol>	SU

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		<p>levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or <math>L_{eq}1H</math> of 65 dB(A) during any hour.</p> <ol style="list-style-type: none"> <li>2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed <math>L_{10}</math> of 60 dB(A)</li> <li>3. New noise sensitive uses proposed to be located near airports:                             <ol style="list-style-type: none"> <li>a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 <u>dB</u> or greater, noise contour; or</li> <li>b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 <u>dB</u> to CNEL 65 <u>dB</u> noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 <u>dB</u> or less.</li> </ol> </li> <li>4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:                             <ol style="list-style-type: none"> <li>a. <math>L_{eq}1H</math> of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;</li> <li>b. <math>L_{eq}1H</math> of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and</li> <li>c. <math>L_{eq}1H</math> of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.</li> </ol> </li> <li>5. Construction noise <u>and vibration</u> shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control <del>Measures</del> <u>Plan</u> (Advanced Engineering Acoustics, November 2005).</li> </ol> <p>Mitigation Measure NOI-3: New Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan                      The County shall include the following new implementation program in the 2040 General Plan.</p>	

**Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan**

The County shall revise the Construction Noise Threshold Criteria and Control Plan within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive groundborne noise. Items that shall be addressed in the plan include, but are not limited to, the following:

Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays.

If pile driving is used, pile holes shall be predrilled to the maximum feasible<sup>1</sup> depth to reduce the number of blows required to seat a pile.

All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.

Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible.<sup>1</sup> The total vibration level produced could be significantly less when each vibration source is operated at separate times.

Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (i.e., 100 feet) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.

Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration

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		<p><u>measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB.</u></p> <p><u>All vibration-inducing activity within the distance parameters described above shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels.</u></p> <p><u>Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, nondisplacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible<sup>1</sup> to reduce vibration levels.</u></p> <p><u>1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.</u></p>	
<p><b>Impact 4.13-7: Expose Noise-Sensitive Land Uses to Railroad Noise and Vibration that Exceeds Applicable Standards</b></p>	<p>N/A</p>	<p>No mitigation is required for this impact.</p>	<p>N/A</p>
<p><b>Population and Housing</b></p>			
<p><b>Impact 4.14-1: Eliminate Three or More Existing Affordable Housing Units or Displace Substantial Numbers of People or Housing Units</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.14-2: Induce Substantial Unplanned Population Growth</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>
<p><b>Impact 4.14-3: Result in Low-Income Employment Opportunities that could Generate Demand for New Housing that Exceeds the County's Inventory of Land to Develop Low-Income Housing</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>

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<b>Public Services and Recreation</b>			
<b>Impact 4.15-1: Increase Demand for Law Enforcement and Emergency Services as a Result of Inadequate Security Measures</b>	PS	<b>Mitigation Measure PS-1: New Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures and Emergency Services Access Need</b> The County shall include the following new implementation program in the 2040 General Plan: <u><b>Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures</b></u> <u>Future discretionary projects shall be reviewed by the County Sheriff's Department to determine whether the project includes adequate security measures and access so as not to exacerbate the need for new law enforcement/emergency services. Security measures considered adequate include but are not limited to: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.</u>	LTS
<b>Impact 4.15-2: Require Expansion or Construction of New Facilities to Support Law Enforcement and Emergency Services</b>	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-2 in Section 4.15 Public Services and Recreation for explanation.	SU
<b>Impact 4.15-3: Require Expansion or Construction of New Fire Protection Facilities and Services as a Result of Excessive Response Times, Project Magnitude, or Distance from Existing Facilities</b>	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-3 in Section 4.15 Public Services and Recreation for explanation.	SU
<b>Impact 4.15-4: Require Expansion or Construction of New Public Libraries or Other Facilities to Meet New Demand or Address Overcrowding and Accessibility</b>	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-4 in Section 4.15 Public Services and Recreation for explanation.	SU

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<p><b>Impact 4.15-5: Require Expansion or Construction of New Parks and Recreation Facilities and Services or Cause Substantial Physical Deterioration of Parks and Recreation Facilities Because of Overuse</b></p>	<p>PS</p>	<p>No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-5 in Section 4.15 Public Services and Recreation for explanation.</p>	<p>SU</p>																																										
<p><b>Transportation and Traffic</b></p>																																													
<p><b>Impact 4.16-1: Exceed VMT Thresholds</b></p>	<p>PS</p>	<p>Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria</u></b>                      Following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not otherwise exempt from CEQA analysis) shall be evaluated for potential environmental impacts relative to VMT using the State's minimum reduction standards, as follows:</p> <table border="1" data-bbox="1045 889 1801 1399"> <thead> <tr> <th>Project Type</th> <th>Measurement Unit</th> <th>Model Trip Types</th> <th>Minimum Criteria</th> <th>Baseline VMT</th> <th>Threshold VMT</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>VMT/Capita</td> <td>Average of all Home Based Trip Types</td> <td>15% Reduction of Regional Average</td> <td>9.66</td> <td>8.21</td> </tr> <tr> <td>Office</td> <td>VMT/Employee</td> <td>Home Based Work Trips</td> <td>15% Reduction of Regional Average</td> <td>13.52</td> <td>11.49</td> </tr> <tr> <td>Industrial</td> <td>VMT/Employee</td> <td>Home Based Work Trips</td> <td>15% Reduction of Regional Average</td> <td>13.52</td> <td>11.49</td> </tr> <tr> <td>Retail</td> <td>Unincorporated VMT</td> <td>All Trip Types</td> <td>No Net Increase in Regional VMT</td> <td>7,500,249</td> <td>7,500,249</td> </tr> <tr> <td>Agriculture</td> <td>Unincorporated VMT</td> <td>All Trip Types</td> <td>No Net Increase in Regional VMT</td> <td>7,500,249</td> <td>7,500,249</td> </tr> <tr> <td>Infrastructure</td> <td>Unincorporated VMT</td> <td>All Trip Types</td> <td>No Net Increase in Regional VMT</td> <td>7,500,249</td> <td>7,500,249</td> </tr> </tbody> </table>	Project Type	Measurement Unit	Model Trip Types	Minimum Criteria	Baseline VMT	Threshold VMT	Residential	VMT/Capita	Average of all Home Based Trip Types	15% Reduction of Regional Average	9.66	8.21	Office	VMT/Employee	Home Based Work Trips	15% Reduction of Regional Average	13.52	11.49	Industrial	VMT/Employee	Home Based Work Trips	15% Reduction of Regional Average	13.52	11.49	Retail	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249	Agriculture	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249	Infrastructure	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249	<p>SU</p>
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All Other Project Types	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249								

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		<p>locally serving commercial, transit supportive projects, or transportation enhancements that reduce VMT;</p> <ul style="list-style-type: none"> <li>▶ <u>Establishment of thresholds of significance for identifying VMT related transportation impacts (to meet or exceed State requirements; at minimum the thresholds will be equivalent to the threshold values for different project types identified in Mitigation Measure CTM-1);</u></li> <li>▶ <u>Standard mitigation measures for significant transportation impacts; and</u></li> <li>▶ <u>Specify the County's procedures for reviewing projects with significant and unavoidable impacts, under CEQA, related to VMT.</u></li> </ul> <p>Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program                      The County shall include the following revised implementation program in the 2040 General Plan.</p> <p><b>Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program</b>                      To support climate change related goals and CEQA related VMT policies pursuant to SB 743 (2013), the County shall develop a VMT Reduction Program <u>no later than 2025. This program <del>should</del> will contain a range of project- and program-level mitigations measures and VMT reduction strategies, that could include:</u></p> <ul style="list-style-type: none"> <li>▶ <u>Preparation of a Transportation Demand Management (TDM) program to promote mode shifts from single occupant vehicle use to transit, ridesharing, active transportation, telecommuting, etc.; and,</u></li> <li>▶ <u>Transportation System Management applications such as park-and-ride lots, intelligent transportation system (ITS) field deployment, pavement management, etc.</u></li> </ul> <p><u>This program shall identify measures to achieve an additional five percent overall reduction in VMT by 2030, and 10 percent by 2040 (relative to 2030 and 2040 business as usual scenarios, respectively). During implementation of the 2040 General Plan, the County <del>shall</del> will review and update the VMT Reduction Program as warranted to provide</u></p>	



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<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
<p><b>Impact 4.16-2: Transportation Infrastructure Needed to Accommodate Growth Would Result in Adverse Effects Related to County Road Standards and Safety</b></p>	<p>PS</p>	<p><del>additional mitigation measures and programs that achieve meet these levels of VMT reduction.</del></p> <p>Mitigation Measure CTM-4: New Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program</u></b></p> <p><u>The County shall require that discretionary development which adds traffic to roadways traversing within a County designated substandard roadway impact area contribute the fair share cost of any safety counter-measures that improve the safety of the impacted roadways by paying the applicable fees under the County's Traffic Impact Fee Mitigation program prior to the issuance of Zoning Clearance.</u></p>	<p>SU</p>
<p><b>Impact 4.16-3: Result in Inadequate Emergency Access</b></p>	<p>PS</p>	<p>Mitigation Measure CTM-5: New Policy CTM-X: Emergency Access</p> <p>The County shall include the following new policy in the 2040 General Plan.</p> <p><b><u>Policy CTM-X: Emergency Access</u></b></p> <p><u>The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels.</u></p> <p>Mitigation Measure CTM-6: New Implementation Program CTM-X: Emergency Access Maintenance</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><b><u>Implementation Program CTM-X: Emergency Access Maintenance</u></b></p> <p><u>The County shall plan capital improvements needed to provide transportation infrastructure that is maintained and/or upgraded to provide appropriate emergency access.</u></p>	<p>SU</p>

**Table 2-4 Summary of Impacts and Mitigation Measures**

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
<p><b>Impact 4.16-4: Conflict With Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.16-5: Substantially Interfere with Railroad Facility Integrity and/or Operations</b></p>	PS	Mitigation Measure CTM-7: New Policy CTM-X: Railroad Safety Assessment The County shall include the following new policy in the 2040 General Plan. <b>Policy CTM-X: Railroad Safety Assessment</b> <u>The County shall require that all new discretionary development is evaluated for potential impacts to existing railroad facilities and operations and identify appropriate mitigation measures, as warranted therein.</u>	LTS
<p><b>Impact 4.16-6: Substantially Interfere with or Compromise the Operations or Integrity of an Existing Pipeline</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Utilities</b></p>			
<p><b>Impact 4.17-1: Cause a Disruption or Rerouting of an Existing Utility Facility</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.17-2: Increase Demand on a Utility that Results in the Relocation or Construction of New, or Expansion of Existing Water, Wastewater, Electric Power, Natural Gas, or Telecommunications Infrastructure, Resulting in the Potential for Significant Environmental Impacts</b></p>	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.17-2 in Section 4.17, "Utilities," for explanation.	SU
<p><b>Impact 4.17-3: Result in Inadequate Wastewater Treatment Capacity to Serve Future Demand, in Addition to the Provider's Existing Commitments</b></p>	LTS	No mitigation is required for this impact.	LTS
<p><b>Impact 4.17-4: Result in Development That Would Adversely Affect Water Supply Quantities during Normal, Single-Dry, and Multiple-Dry Years</b></p>	PS	Mitigation Measure UTL-1: New Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years The County shall include the following new implementation program in the 2040 General Plan. <b>Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years</b> <u>Water-demand projects (as defined in Section 15155 of the State CEQA Guidelines) that require service from a public water system shall prepare a water supply assessment prior to project approval. If the projected water</u>	SU

**Table 2-4 Summary of Impacts and Mitigation Measures**

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
<p>NI = No impact    LTS = Less than significant    PS = Potentially significant    S = Significant    SU = Significant and unavoidable                      N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements</p>			
		<p>demand associated with the project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment must address the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years for a 20-year projection. The assessment shall describe if the new water service will be sufficiently met under this 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected public water system and the County. <del>If, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the County its plans for acquiring additional water supplies.</del> A water-demand project that includes a new water service from a public water system shall not be approved unless adequate water supplies are demonstrated.</p>	
<p><b>Impact 4.17-5: Result in a Direct or Indirect Adverse Effect on a Landfill's Disposal Capacity, Such That It Reduces Its Useful Life to Less Than 15 Years</b></p>	<p>LTS</p>	<p>No mitigation is required for this impact.</p>	<p>LTS</p>

### 3.3 REVISIONS TO CHAPTER 3: PROJECT DESCRIPTION

No revisions have been made to this chapter of the draft EIR.

### 3.4 REVISIONS TO CHAPTER 4: ENVIRONMENTAL IMPACT ANALYSIS

No revisions have been made to this section of the draft EIR.

### 3.5 REVISIONS TO SECTION 4.1: AESTHETICS, SCENIC RESOURCES, AND LIGHT POLLUTION

No revisions have been made to this section of the draft EIR.

### 3.6 REVISIONS TO SECTION 4.2: AGRICULTURE AND FORESTRY RESOURCES

Mitigation Measure AG-2 has been revised to (1) exempt farmworker housing projects from the requirements Mitigation Measure AG-2; (2) reduce the farmland mitigation ratio from 2:1 to 1:1, and (3) require the deposit of funds to the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and Agricultural Commissioner regarding the establishment and implementation of the agricultural conservation easement(s). The term “offsite” has also been clarified in the mitigation measure. The revised mitigation measure is as follows:

**Implementation Program AG-X: Establish an Agricultural Conservation Easement**  
Applicants for discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall be required to ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. “Offsite” means an area that is outside of the project’s permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. Discretionary projects to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement.

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

If the Planning Division, in consultation with the Agricultural Commissioner, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall prepare and submit a report for the review and approval of the Planning Division in consultation with the Agricultural Commissioner which identifies a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of ~~an~~ one or more offsite agricultural conservation easements. The preservation of more than one site agricultural conservation easement may be considered in order to meet the required number of acres. The applicant shall also deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and Agricultural Commissioner regarding the establishment and implementation of the agricultural conservation easement(s). The contents of the report shall be determined, reviewed, and approved by the Planning Division in consultation with the Agricultural Commissioner (hereafter referred to as the “reviewing agencies”), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the conservation easement (e.g., a land trust organization) to determine the viability of the proposed mitigation site(s) for the establishment of a permanent agricultural conservation easement.

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

### 3.7 REVISIONS TO SECTION 4.3: AIR QUALITY

The text of Mitigation Measures AQ-1a and AQ-1b have been revised in the final EIR to include a definition for the term “feasible.” Additionally, Mitigation Measure AQ-1b has been revised for consistency with the Ventura County Air Pollution Control District’s recommendation that measures to reduce construction-related emissions be incorporated into every project requiring discretionary County approval as explained in response to comment A14-2. Revisions made to Mitigation Measures AQ-1a and AQ-1b are provided below.

Mitigation Measure AQ-1a: New Policy HAZ-X: Construction Air Pollutant Best Management Practices  
The County shall include the following new Policy HAZ-X in the 2040 General Plan.

**Policy HAZ-X: Construction Air Pollutant Best Management Practices**

Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.

~~The County shall ensure that discretionary development will, to the extent feasible, incorporate best management practices (BMPs) to reduce emissions to be less than applicable thresholds. These BMPs include but are not limited to the most recent VCAPCD recommendations for construction BMPs (per the Air Quality Assessment Guidelines or as otherwise identified by VCAPCD).~~

Mitigation Measure AQ-1b: New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices**

Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices

~~Applicants for future d~~Discretionary development projects that would will generate construction-related air emissions that exceed applicable thresholds, will shall be required to include, but are not limited to, the following types of emission reduction mitigation measures and potentially others, as recommended by VCAPCD (in its Air Quality Assessment Guidelines Guidance or otherwise), to the extent feasible and applicable to the project as determined by the County: The types of measures shall include but are not limited to: maintaining equipment per manufacturer specifications; lengthening construction duration to minimize number of vehicle and equipment operating at the same time during the summer months; use of Tier 3 at a minimum, or Tier 4 if commercially available diesel engines in all off-road construction diesel equipment, at a minimum; and, if feasible<sup>1</sup> using electric-powered or other alternative fueled equipment in place of diesel powered equipment (whenever feasible).

1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines section 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

Mitigation Measure AQ-2a on page 4.3-15 is revised as follows:

Mitigation Measure AQ-2a: New Policy HAZ-X: Fugitive Dust Best Management Practices

The County shall include the following new policy in the 2040 General Plan.

**Policy HAZ-X: Fugitive Dust Best Management Practices**

The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs that to reduce emissions to be less than applicable thresholds.

For clarification, Mitigation Measure AQ-2b on page 4.3-15 has been revised to remove the duplicative bullet point and for consistency with the Ventura County Air Pollution Control District's recommendation that measures to reduce construction-related fugitive dust be incorporated into every project requiring discretionary County approval:

Mitigation Measure AQ-2b: New Implementation Program HAZ-X: Fugitive Dust Best Management Practices

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Fugitive Dust Best Management Practices**

Applicants for future discretionary development projects that which will generate construction-related fugitive dust emissions that exceed applicable thresholds will shall be required by the County to include, but are not limited to, the types of mitigation dust reduction measures recommended by VCAPCD's in its Air Quality Assessment Guidelines, or otherwise, to the extent feasible and applicable such as:

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

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

The County has added the following text to Impact 4.3-3 on page 4.3-17 to clarify and expand on the acute and chronic health impacts associated with emissions of ROG and NOX that exceed VCAPCD thresholds of significance:

As shown in Table 4.3-4, operational activities would result in emissions of ROG and NOX that exceed the VCAPCD thresholds of significance for both countywide and the Ojai Valley. As discussed in the “Thresholds of Significance” section, VCAPCD developed these thresholds in consideration of achieving and maintaining the NAAQS and CAAQS, which represent concentration limits of criteria air pollutants and precursors needed to adequately protect human health. ~~Therefore, the 2040 General Plan’s contribution to operational criteria air pollutants and precursors could result in greater acute or chronic health impacts compared to existing conditions.~~

The addition of ROG and NO<sub>x</sub>, which are precursors to ozone, could result in an increase in ambient concentrations in Ventura County and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. As summarized in the January 2020 Background Report, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. Also, the increase in operational emissions of PM<sub>10</sub> could impede air quality planning efforts to bring Ventura County into attainment of the CAAQS for PM<sub>10</sub>. However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with implementation of the 2040 General Plan to specific health outcomes to sensitive receptors. While the description of the effects noted above could manifest in the recipient receptors, actual



effects on individuals depend on individual factors, such as life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even armed with this type of specific medical information (which is confidential to the individual), there are wide ranges of potential health outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the types of health effects that could occur, it would be speculative to more specifically correlate exposure to ozone precursors and particulates from the 2040 General Plan to specific health outcomes to receptors. By evaluating emissions of air pollutants against VCAPCD's thresholds, it is foreseeable that health complications associated with ozone and PM<sub>10</sub> exposure could be exacerbated to nearby sensitive receptors by operational emissions.

To clarify the discussion provided in the draft EIR, the County has made the following revisions to the discussions of Policy HAZ-10.5 and HAZ-10.12 on page 4.3-18:

Policy HAZ-10.5 states that the County shall work with applicants for discretionary development projects to incorporate measures to reduce air pollution impacts and greenhouse gas emissions, such as bike facilities, solar water heating, solar space heating, electric appliances and equipment, and zero and near-zero emission vehicles, and HAZ 10.12 would require that discretionary development with significant adverse air quality impacts only be approved if it is conditioned with all feasible reasonable mitigation measures to avoid, minimize or compensate for the impact.

To provide additional mitigation to reduce local toxic exposure from heavily traveled transportation corridors Mitigation Measure AQ-3 (page 4.3-22) is revised as follows:

Mitigation Measure AQ-3: New Policy HAZ-10.X: ~~Setback Requirements~~ Health Risk Assessments for Sensitive Land Uses Near Heavily Traveled Transportation Corridors

The County shall include the following new policy in the 2040 General Plan.

**Policy HAZ-10.X: ~~Setback Requirements~~ Health Risk Assessments for Sensitive Land Uses Near Heavily Traveled Transportation Corridors**

The County shall require discretionary development for land uses which that include sensitive receptors which are considered to be populations or uses that are more susceptible to the effects of air pollution than the general population, such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds are be located at least 500 1,000 feet from any freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural roads that exceed 50,000 vehicles per day. New sensitive receptor use structures can be located within 500 1,000 feet from a new or existing freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural road with traffic volumes that exceed 50,000 vehicles per day only if a project applicant first prepares a qualified, site-specific health risk assessment (HRA). The HRA shall be conducted in accordance with guidance from VCAPCD and approved by VCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million, then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. No further action shall be required if the HRA demonstrates that the level of cancer risk would be less than 10 in 1 million.

Project design features that may be considered in an HRA may include, but are not limited to: installing air intakes furthest away from the heavily traveled transportation corridor; installing air filtration (as part of mechanical ventilation systems or stand-alone air cleaner); using air filtration devices rated MERV-13 or higher; requiring ongoing maintenance plans for building HVAC air filtration systems; limiting window openings and window heights on building sides facing the heavily traveled transportation corridor; or permanently sealing windows so they don't open on the side of the building facing the heavily traveled transportation corridor; and installing vegetative barriers, considering height and cover thickness, to create a natural buffer between sensitive receptors and the emissions source. For purposes of this policy, "sensitive receptors" means populations or uses that are more susceptible to the effects of air pollution than the general population such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds.

For clarification, the text on page 4.3-24 has been revised as shown below:

To deter ~~from~~ potential conflicts with existing agricultural land uses, as part of the Right to Farm ordinance, ~~the County is~~ sellers of real property are required to give notice of this ordinance to buyers of real property located in the county. The County also has a mediation process for any disputes involving agricultural land uses and issue opinions on whether certain agricultural land uses constitute a nuisance. The County's "Right to Farm" ordinance serves to mitigate issues regarding exposure of sensitive receptors to odors from agricultural land and operations while protecting agricultural land uses in the county. This ordinance would serve to protect agricultural lands in the county during implementation of the 2040 General Plan and mitigate issues regarding exposure of sensitive receptors to odors from agricultural land operation that may be considered a nuisance.

### 3.8 REVISIONS TO SECTION 4.4: BIOLOGICAL RESOURCES

For clarity, page 4.4-14 is revised as follows:

#### ISSUES NOT DISCUSSED FURTHER

##### Consistency with Adopted Habitat Conservation Plans

No habitat conservation plans or natural community conservation plans have been adopted within the plan area of the 2040 General Plan. There would be no impact due to conflict with conservation plans or natural community conservation plans. This issue is not discussed further.

For clarification, Section 4.4.2, "Environmental Impacts and Mitigation Measures," is revised to incorporate Policy WR-7.1 on page 4.4-17 (following the bullet, "Policy COS 9.3: Open Space Preservation"):

##### Conservation and Open Space Element

- ▶ **Policy WP-7.1: Water for the Environment.** The County encourage the appropriate agencies to effectively manage water quantity and quality to address long-term adequate availability of water for environmental purposes, including maintenance of

existing groundwater-dependent habitats and in-stream flows needed for riparian habitats and species protection. (IGC) [New Policy]

For clarification, page 4.4-20 of the draft EIR has been edited as follows:

The Rural land use designation would allow for low-density and low-intensity land uses such as residential uses and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

For clarification, in response to public comments and to provide alignment with existing practices identified in the Initial Study Assessment Guidelines for the evaluation of discretionary development that could potentially impact sensitive biological resources Mitigation Measure BIO-1 beginning on page 4.4-23 is revised as follows:

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources  
The County shall include the following new implementation program in the 2040 General Plan.

~~**Implementation Program COS-X: Protection of Sensitive Biological Resources**~~

~~The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:~~

~~The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special status plant, special status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the County and California Coastal Commission, and database searches of the CNDDB and the CNPS Inventory of Rare and Endangered Plants of California.~~

~~The qualified biologist shall conduct a reconnaissance level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.~~

~~If the reconnaissance level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures.~~

~~If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance level survey, then the following measures shall apply:~~

~~Special Status Species~~

~~If special status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.~~

~~If special status species are identified during protocol level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts.~~

~~If impacts on special status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation; generally at least a 1:1 ratio. Compensation may include purchasing credits from a USFWS or CDFW approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.~~

~~Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors~~

~~If sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors are identified within or adjacent to the project footprint, these features shall be avoided, if feasible, by implementing no-disturbance buffers around sensitive habitats, wetlands, other non-wetland waters, or native wildlife nursery sites, and avoiding development within wildlife corridors or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting) within wildlife corridors, such that direct and indirect adverse effects of project development are avoided.~~

~~A delineation of aquatic habitat within a project site (including waters of the United States and other waters including those under State jurisdiction) including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetlands or other water features identified within or adjacent to the project footprint.~~

~~If impacts to sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project proponent shall obtain required regulatory authorization (e.g., Section 404 permits for impacts to waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts to aquatic or riparian habitats within GDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts to ESHA), and shall compensate for unavoidable losses of these resources. Compensation may include restoration of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors within or outside of the project site, preserving the aforementioned resources through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function, or purchasing credits at an existing authorized mitigation bank or in lieu fee program. The County shall require restoration or compensation for loss of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors at a minimum of a 1:1 ratio or "no net loss."~~

Implementation Program COS-X: Protection of Sensitive Biological Resources

For any future discretionary development project that could potentially impact sensitive biological resources, the project shall be evaluated pursuant to the methodology described in the Ventura County Initial Study Assessment Guidelines which shall be amended within one year of 2040 General Plan adoption to include the following:

A preliminary assessment of the project shall be completed by County staff, in consultation with a qualified biologist, using available mapped biological resource data and aerial imagery to determine if the project has the potential to impact sensitive biological resources in the defined impact area (direct and indirect impacts). County staff will determine if project conditions or mitigation measures can be developed and implemented that would reduce or avoid those impacts to a less than significant level without requiring a more comprehensive biological resource assessment, otherwise known as an Initial Study Biological Assessment. Examples of projects that would not require a biological resource assessment may include but are not limited to: Projects that occur in previously developed areas, if additional vegetation removal is not required or the use may not impact surrounding natural areas; or projects on land consisting of non-native grasslands totaling less than one acre that are completely surrounded by existing urban development (such as urban infill lots).

If County staff find that the project may adversely affect sensitive biological resources, then a County approved qualified biologist shall prepare a biological resource assessment to assess and mitigate the adverse impacts of the proposed project. The procedures detailed in Step 3 of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section shall be followed to prepare this biological resource assessment.

The biological resource assessment shall be conducted by a County approved qualified biologist that meets the minimum qualifications for

biological consultants listed in Attachment 1 to the County of Ventura Initial Study Assessment Guidelines. The qualified biologist shall have expertise in the taxonomic group or species on which the surveys are focused as well as the County's data review procedures and survey methods recommended by natural resource agencies or commonly accepted standards in the taxonomic group, community, or species (e.g., California Native Plant Society survey protocols).

The biological field survey area will be determined by the County agency responsible for administering the project with consideration of recommendations from the qualified biologist. The survey area will include all areas of proposed disturbance, including associated equipment or personnel staging areas, and the surrounding area of potential sensitive biological resources that may be indirectly adversely affected by the project. The size of the survey area will be based on the characteristics of surrounding habitat, the potential for sensitive biological resources to occur, and the nature of the project. For example, an infill project within an already developed area may not require a large survey area; however, a development project adjacent to natural habitat may require a larger survey area based on the potential for disturbance. The procedure for delineating the size of the survey area will follow Step 1 of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section.

Prior to conducting any field surveys, the qualified biologist shall conduct an initial data review to determine the type of sensitive biological resources that may occur within the survey area using the procedures detailed in Step 3 (a) of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section. This will include but not be limited to review of the best available, current data including: vegetation mapping data, mapping data from the County (Locally Important Species, Habitat Connectivity and Wildlife Corridor, Water Protection District data, past biological reports in the area, etc.); National Wetland Inventory Database (NWI); USGS National Hydrographic Dataset; EcoAtlas; and database searches of the US Fish and Wildlife Service Critical Habitat, Environmental Conservation Online System (ECOS) and Information, Planning, and Conservation System (IPaC); California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB); and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California; Audubon Important Bird Areas and Red Lists, Xerces Society, etc.

**Biological Inventory -Special Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors**

The biological inventory shall be conducted as detailed in Step 3 (b) Conduct Field Survey and (c) biological inventory, of the County of Ventura Initial Study Guidelines, Biological Resources Chapter, Methodology Section, which includes a general floristic survey of the project impact areas.

Vegetation communities within the survey area shall be inventoried using the CDFW vegetation classification standards (Manual of California Vegetation) and the most

recent version of CDFW vegetation mapping standards “Survey of California Vegetation Classification and Mapping Standards [CDFW, 2019].

If the initial data review shows a wetland or water occurring within 300 feet (in non-coastal zone) or 500 feet (in coastal zone) from the edge of the proposed disturbance areas, then a qualified biologist shall delineate the aquatic habitat (including waters of the United States and other waters including those under State jurisdiction). A summary of the type of aquatic habitat, primary water source, species diversity, connectivity to off-site habitat or other hydrological features, hydric soils, and hydrophytic vegetation, and the boundary of the feature (based upon the outermost limit of associated vegetation (canopy drip line or scrub line), hydric soils, bank and bed – whichever is greater) shall be included in the biological resource assessment.

If the initial data review indicates that sensitive biological resources have the potential to occur within the survey area, a qualified biologist shall conduct additional focused surveys for these species or other protected habitats using the most recently updated protocols recommended by natural resource agencies (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]), or if not available, standards accepted in the professional biological community to survey that taxonomic group, community, or species. If an established protocol is not available for a special-status species then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.

#### **Mitigation for Special-Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors**

If a sensitive biological resource is identified during field surveys, then the County shall require implementation of mitigation measures at the project level that fully account for the adversely affected resource. To the maximum extent feasible, mitigation measures should adhere to the following priority to reduce adverse impacts of a proposed project to the resource: avoid impacts, minimize impacts, and compensate for impacts.

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

- Priority 1. Avoid of Impacts: Proposed development shall avoid impacts to the maximum extent feasible by not taking certain actions or parts of an action. Projects shall be sited to avoid direct or indirect impacts on the resource, and include measures such as implementing no-disturbance buffers (e.g., nesting bird buffer areas during construction, siting staging areas outside buffer area), or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting in a wildlife corridor), such that indirect adverse effects of project development are avoided.
- Priority 2. Minimize Impacts: Proposed development shall be conditioned to minimize adverse impacts by limiting the degree or magnitude of the action and its implementation to less than significant to the maximum extent feasible. Other

mitigation measures may include reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

Measures to mitigate the spread of invasive plant species and invasive wildlife species (e.g., New Zealand mudsnail) shall include but will not be limited to: cleaning of equipment, footwear, and clothing before entering a construction site and the identification and treatment of significant infestations of invasive plant species within a project site.

- Priority 3. Compensate for Impacts: Compensating for the impact can be done by replacing or providing substitute resources or by rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

Compensatory mitigation ratios for protected sensitive resources will be established based on the rarity of the resource, quality of affected habitat associated with the resource, temporary and permanent losses to habitat function, the type of mitigation proposed (restoration, enhancement, preservation, establishment), and other requirements associated with state or federal permits. Mitigation ratios will be determined at the project level in consultation with the County, the qualified biologist, and, where applicable, federal or state agencies with jurisdiction over the resource (e.g., CDFW, USACE, USFWS).

If impacts on a protected sensitive biological resource are unavoidable, then the project proponent shall mitigate for the type of resource as follows:

Endangered, Rare, Threatened, or Candidate Species: The applicant shall obtain incidental take authorization from USFWS (16 U.S. Code [U.S.C.] Section 1531 et seq.) or CDFW (California Fish and Game Code Sections 2050–2115.5) prior to commencing development of the project site, apply minimization measures or other conditions required under the incidental take authorization, and shall provide equivalent compensation for the unavoidable losses of these resources, generally at a minimum ratio of 1:1, or greater. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.

Special-Status Species (includes Locally Important Species): The applicant shall provide equivalent compensation for impacts on special-status species by restoring or significantly enhancing existing habitat where the species occurs, acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation.

If impacts on sensitive habitats, wetlands, other non-wetland waters, riparian habitats, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project applicant shall:

Federal or State Protected Sensitive Habitats: Obtain the required regulatory authorization (e.g., Section 404 permits for impacts on waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts on aquatic or riparian habitats within



CDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts on ESHA), and provide equivalent compensation for the unavoidable losses of the above mentioned resources such that there is no net loss.

Other Protected Sensitive Habitats (includes locally important plant communities, sensitive natural communities, habitat connectivity and wildlife corridors, native wildlife nursery or overwintering sites): Provide compensation for other protected sensitive habitats which may include the restoration, enhancement, or preservation of the aforementioned habitats within or outside of the project site, or the purchasing of credits at an existing mitigation bank or in lieu fee program deemed acceptable by the County Planning Director.

All compensatory mitigation sites shall be protected in perpetuity through a conservation easement (if off-site), or deed restriction (or other comparable legal instrument) if on-site.

The County shall, in harmonizing the 2040 General Plan with the Ventura County Initial Study Assessment Guidelines, add definitions for the habitat types included in this mitigation measure, including which components are subject to compliance with the County's Local Coastal Program and Coastal Zoning Ordinance versus non-coastal areas.

1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

2. "Mitigation, No-Net-Loss" A principle where if a development project cannot avoid the loss of a valued natural resource, the project mitigates the impacts by replacing the impacted habitat with a newly created or restored habitat of the same size and similar functional condition so that there is no loss of ecological functions and values of that habitat type for a defined area. Similar functional condition means the relative ability to support and maintain the same species composition, diversity, and functional organization as the impacted habitat.

For clarification page 4.4-31 of the draft EIR has been edited as follows:

In addition to existing federal and State laws and permitting processes, the 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts on wildlife corridors and native wildlife nursery sites and require project-level environmental review and mitigation for significant impacts (see "General Plan Update Policies and Implementation Programs," above). For example, Policies COS-1.1 and COS-1.2 address the protection and consideration of sensitive biological resources, which include wildlife movement corridors and native wildlife nursery site. Because these features are typically considered sensitive biological

resources, implementation of Policies COS-1.1 and COS 1.2 would require evaluation of these features during site-specific surveys as well as development of mitigation measures to avoid, minimize, or compensate for impacts. Policies COS-1.7, COS-1.8, COS-1.9, COS-1.10, and COS-1.11 include requirements ~~to requirements~~ for environmental review for projects within 300 feet of wetland habitat, implementation of 100-foot setbacks from wetland habitat, incorporation of protective design features to avoid impacts to riparian habitat, and requirements for consultation with natural resources agencies for guidance regarding avoidance and minimization of impacts to rare, threatened, or endangered species. These requirements would have an indirect benefit on wildlife movement corridors and native wildlife nursery sites as these features are frequently associated with sensitive biological habitats (e.g., wetlands, riparian corridors). Policies COS-2.2, COS-2.4, COS-2.8, COS-2.9, COS-2.10, COS-2.11 address habitat conservation and protection of fisheries and marine resources within the Coastal Zone. Policies COS-1.3, COS-1.4, and COS-1.5 specifically address impacts on wildlife movement. For instance, the County is required to consider impacts to wildlife movement as part of the discretionary project review process, and the design and maintenance of floodplain improvements including culverts and bridges must be reviewed by a qualified biologist to accommodate feasible wildlife passage measures. Policy COS-9.3 addresses preservation of open space lands for habitat protection and wildlife movement. Development within the county will also be guided by nine Area Plans; however, the policies of these Area Plans do not provide additional or more specific protection for resident or migratory wildlife corridors or native wildlife nursery sites than the 2040 General Plan policies.

### 3.9 REVISIONS TO SECTION 4.5: CULTURAL, TRIBAL CULTURAL, AND PALEONTOLOGICAL RESOURCES

For clarification, the text of Mitigation Measure CUL-1a on page 4.5-15 is refined as shown below:

Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation

The County shall include the following revised policy in the 2040 General Plan.

**Policy COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation**

The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources, and shall avoid potential impacts to these resources whenever to the maximum extent feasible. ~~Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of feasible mitigation and/or shall be mitigated by extracting extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.~~

In response to the County's tribal consultation process with the Fernandefio Tataviam Band of Mission Indians, the text of Mitigation Measure CUL-1c on page 4.5-16 is revised as shown below:

Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures**

For discretionary projects, the County shall require the following:

Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.<sup>1</sup>

If determined necessary by the County, an archaeological, or paleontological, and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.

If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.

1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

For clarification, the text of Mitigation Measure CUL-3 beginning on page 4.5-19 is revised to define the term “feasible,” as shown below:

Mitigation Measure CUL-3: New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources**

During project-specific environmental review of discretionary development, the County shall define the project’s area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historic resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historic resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG and Cultural Heritage Board Ordinance.

Before altering or otherwise affecting a building or structure 50 years old or older, the project-applicant shall retain a qualified architectural historian according to the Secretary of the Interior Standards, to record it on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building has not previously been evaluated. Its significance shall be assessed by a qualified architectural historian, using the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. For buildings or structures that do not meet PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required.

For a building or structure that qualifies as a historic resource, the architectural historian and the County shall consult to consider measures that would enable the project to avoid direct or indirect impacts to the building or structure. These could include preserving a building on the margin of the project site, using it “as is,” or other measures that would not alter the building. If the project cannot avoid modifications to a historic building or structure, the following shall be considered:

- 1) If the building or structure can be preserved on site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.
- 2) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural

descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.

- 3) If preservation and reuse at the site are not feasible,<sup>1</sup> the historical building shall be documented as described in item (2) and, when physically and financially feasible,<sup>1</sup> be moved and preserved or reused.
- 4) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible,<sup>1</sup> the historical building shall be documented as described in item (2).

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

In response to the County’s tribal consultation process with the Fernandeño Tataviam Band of Mission Indians, the following revisions are proposed to Mitigation Measure CUL-5 on page 4.5-23:

Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation

The County shall include the following revised policy in the 2040 General Plan.

**Policy COS-4.2a: Cooperation for ~~Tribal~~ Cultural, Historical, Paleontological, and Archaeological Resource Preservation**

The County shall cooperate with cities, special districts, ~~other~~ appropriate organizations, ~~including the Native American Heritage Commission~~, and private landowners to identify known tribal cultural, archaeological, historical, and paleontological resources. If necessary, the County shall engage in consultation with local tribes and preservation groups, to and preserve the county’s tribal cultural, historical, paleontological, and archaeological identified resources within the county.

**Policy COS-4.2b: Cooperation for Tribal Cultural Resource Preservation**

For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.

In response to the County's tribal consultation process with the Fernandeño Tataviam Band of Mission Indians, the following revisions are proposed to Mitigation Measure CUL-6 on page 4.5-26:

Mitigation Measure CUL-6: New Implementation Program COS-X: Implement Project-Level Security Measures  
The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program COS-X: Implement Project-Level Security Measures**

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

### 3.10 REVISIONS TO SECTION 4.6: ENERGY

No revisions have been made to this section of the draft EIR.

### 3.11 REVISIONS TO SECTION 4.7: GEOLOGIC HAZARDS

No revisions have been made to this section of the draft EIR.

### 3.12 REVISIONS TO SECTION 4.8: GREENHOUSE GAS EMISSIONS

To provide clarification, the California Air Resources Board's (CARB's) Methane Municipal Waste Landfill Regulation on has been added to the "Regulatory Settings" subsection page 4.8-1 of the draft EIR is revised as follows:

The California Air Resources Board (CARB) adopted regulations to reduce Methane Emissions from Municipal Solid Waste Landfills (June 2010) which require the installation and proper operation of gas collection and control systems at active, inactive, and closed municipal solid waste landfills having 450,000 tons of waste-in-place or greater that received waste after January 1, 1977 unless certain exemption conditions have been met. The regulations contain performance standards for the gas collection and control system and specify monitoring requirements to ensure that the system is being maintained and operated in a manner to minimize methane emissions. The regulations include a leak standard for gas collection and control

system components, a monitoring requirement for wellheads, methane destruction efficiency requirements for most control devices, surface methane emission standards, and reporting requirements.

The following discussion of the Regulation for Mandatory Reporting of Greenhouse Gas Emissions and the Cap-and-Trade regulation pertaining to GHG emissions sources is added on page 4.8-2:

In 2011, CARB adopted the Cap-and-Trade regulation and created the Cap-and-Trade program. The program covers GHG emissions sources that emit more than 25,000 metric tons of carbon dioxide equivalent per year (MTCO<sub>2</sub>e/year) such as refineries, power plants, industrial facilities, and transportation fuels. The Cap-and-Trade program includes an enforceable statewide emissions cap that declines approximately 3 percent annually. CARB distributes allowances, which are tradable permits, equal to the emissions allowed under the cap. Sources that reduce emissions more than their limits can auction carbon allowances to other covered entities through the Cap-and-Trade market. Sources subject to the cap are required to surrender allowances and offsets equal to their emissions at the end of each compliance period (CARB 2012). Stationary sources that emit more than 10,000 MTCO<sub>2</sub>e/year are required to report their GHG emissions annually to CARB pursuant to the Mandatory Reporting Regulation but are not required to reduce GHG emissions until the 25,000 MTCO<sub>2</sub>e/year cap is exceeded. The Cap-and-Trade program was initially slated to sunset in 2020, but the passage of SB 398 in 2017 extended the program through 2030.

To provide clarification, page 4.8-5 of the draft EIR is revised as follows:

This is a change in GWP values from the IPCC Fourth Assessment Report (AR4), which were originally used in the inventory, and in Appendix B of the 2040 General Plan for consistency with the State's Scoping Plan. GWP values apply a weight to gases that have been determined by scientific studies to have increased GHG effects relative to the most common GHG, carbon dioxide (CO<sub>2</sub>). These weighted gasses are combined with CO<sub>2</sub> to form a common unit of measurement called CO<sub>2</sub>e. For this analysis GWP values of 28 for methane and 265 for nitrous oxide were used for consistency with AR5 (Myhre et. al 2013). Table 4.8-1 shows the 2015 GHG emissions for Ventura County, which were used as the baseline for the integrated CAP.

**Table 4.8-1 Baseline 2015 GHG Emissions for the Unincorporated County**

Sector	MT CO <sub>2</sub> e	% of countywide emissions <sup>1</sup>
Agriculture	260,849	<del>13.5</del> 43.7
Building Energy	322,048	<del>16.6</del> 47.0
Off Road Equipment	52	<0.1
Solid Waste	333,167	<del>17.2</del> 47.6
Stationary Source	<del>317,222</del> 275,096	<del>16.4</del> 44.5
Transportation	692,753	<del>35.7</del> 36.5
Water and Wastewater	13,148	<del>0.7</del> 0.4
<b>Total</b>	<b><del>1,939,238</del> 4,897,442</b>	<b>100</b>

1: Percentages may not add to 100 percent due to rounding.

**Projections**

GHG emissions for most sectors in the unincorporated area of the county were forecast through 2020, 2030, 2040, and 2050 using growth rates for population, employment, and housing prepared by the Southern California Association of Governments (SCAG) for the 2020 Regional Transportation Plan and Sustainability Communities Strategy (SCAG 2017). Transportation sector GHG emissions for on-road vehicles were projected using VMT forecasts obtained from the Ventura County Transportation Commission (VCTC). These VMT forecasts were adjusted using recommended methods from the SB 375 (2008) Regional Targets Advisory Committee and converted to CO<sub>2</sub>e using emissions factors from CARB’s Emissions Factor model. Stationary source emissions sector GHG emissions were scaled according to the Ventura County’s historical trends in oil production over the last 40 years, starting from 1980, using data from CARB and the annual report from the California Department of Conservation (California Department of Conservation 2020, CARB 2013). The business-as-usual forecasts were adjusted to account for State and federal legislative and regulatory actions that will reduce future emissions from activities within the unincorporated area, without any additional local government action. Legislation and regulations considered include:

Table 4.8-2 on page 4.8-6 is revised to reflect the changes in draft EIR Appendix D:

**Table 4.8-2 Forecast GHG Emissions for Unincorporated Ventura County 2020 to 2050**

Sector	Forecast Emissions <sup>1</sup> (MT CO <sub>2</sub> e)			
	2020	2030	2040	2050
Agriculture	256,223	248,882	241,541	234,200
Building Energy	308,629	285,079	225,567	197,996
Off Road Equipment	52	<del>54</del> <u>52</u>	<del>56</del> <u>52</u>	<del>59</del> <u>52</u>
Solid Waste	<del>323,611</del> <u>302,814</u>	<del>316,441</del> <u>278,381</u>	<del>288,020</del> <u>270,280</u>	<del>262,405</del> <u>262,560</u>
Stationary Source	<del>245,340</del> <u>287,845</u>	<del>198,432</del> <u>314,526</u>	<del>160,660</del> <u>343,679</u>	<del>130,212</del> <u>375,535</u>
Transportation	625,263	487,058	446,355	450,232
Water and Wastewater	<del>13,420</del> <u>13,148</u>	<del>13,576</del> <u>13,148</u>	<del>13,699</del> <u>13,148</u>	<del>13,788</del> <u>13,148</u>
Total	<del>1,772,537</del> <u>4,793,974</u>	<del>1,549,522</del> <u>4,627,124</u>	<del>1,375,898</del> <u>4,540,630</u>	<del>1,288,892</del> <u>4,533,723</u>

Notes: MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalents, comprised of carbon dioxide, methane, and nitrous oxides. <sup>1</sup>Includes legislative reductions from State and federal programs.

Source: Ascent Environmental, 2020~~19~~

Table 4.8-3 on page 4.8-7 is also revised to reflect the changes in draft EIR Appendix D:

**Table 4.8-3 2040 General Plan Target Reduction from 2015 Baseline Emissions Levels, 2020 to 2050**

	2020	2030	2040	2050
Target Percentage Below 2015 Baseline GHG Emission Levels	2.1%	41.3%	60.9%	80.4%
GHG Emissions Target (MT CO <sub>2</sub> e)	<del>1,897,847</del> <u>4,856,620</u>	<del>1,138,708</del> <u>4,113,072</u>	<del>759,139</del> <u>742,648</u>	<del>379,569</del> <u>371,324</u>
GHG Reductions Needed from Forecast GHG Emissions to Meet Targets (MT CO <sub>2</sub> e)	-125,310	<u>410,813</u>	<u>616,760</u>	<u>909,323</u>
	<del>-62,649</del>	<del>513,153</del>	<del>797,982</del>	<del>4,162,398</del>

Notes: The negative number for GHG reductions in 2020 means that the forecast GHG emissions for 2020 will be below the 2020 target.

Source: Ascent Environmental, 2020~~19~~



For clarification, the discussion of Impact 4.8-1 on page 4.8-38 is revised as follows:

Under the business-as-usual scenario adjusted for federal and State climate and energy legislation, as described above in the methodology subsection, GHG emissions in unincorporated Ventura County are projected to decrease from 1,772,537 ~~1,793,971~~ MT CO<sub>2e</sub> in 2020 to 1,375,898 ~~1,540,630~~ MT CO<sub>2e</sub> in 2040, a decrease of 396,639 ~~253,344~~ MT CO<sub>2e</sub> or 44-22 percent (as shown in Table 4.8-2). Between 2015 and 2040, GHG emissions are projected to decrease from 1,939,238 ~~1,897,112~~ MT CO<sub>2e</sub> to 1,375,898 ~~1,540,630~~ MT CO<sub>2e</sub>, a decrease of 563,340 ~~356,482~~ MT CO<sub>2e</sub> or 49-29 percent.

These GHG reductions are primarily due to State and federal implementation of legislation with local benefits, such as increases to the pace and scale of renewable energy generation replacing fossil-fuel power plants in compliance with RPS mandates, local implementation of actions associated with CARB's Short-Lived Climate Pollutant Strategy, and improvements to the fuel economy of new motor vehicles resulting from implementation of the State's Advanced Clean Cars Program. Additionally, emissions related to oil and gas production under the stationary source sector has been declining since 1980 and is expected to continue to decline into the future as oil and gas resources in the area are reduced. While these regulations and resource trends result in meaningful GHG reductions at the local level, additional actions, local or otherwise, would be needed to meet the GHG 2030 reduction target of 41 percent below 2015 levels by 2030, as identified in the 2040 General Plan under Policy COS-10.2.

In addition, the following changes have been made to Table 4.8-5 and the text that follows on pages 4.8-39 and 4.8-40:

**Table 4.8-5 Quantified GHG Reductions**

<b>Program / Policy</b>	<b>2030 GHG Reductions – MT CO<sub>2e</sub></b>	<b>Assumptions</b>
AG-H: Nutrient Management Plans	33,830	Replace inorganic nitrogen fertilizer with organic fertilizer from locally sourced organic waste – 25 percent replacement by 2030.
COS-8.4: Clean Power Alliance	59,972	Community Choice Aggregation Program increases enrollment in Green Choice Program (100 percent renewable electricity) to 95 percent of all residential and commercial customers by 2030.
COS-H: County Tree Planting Program	354	Tree planting program, 1,000 annually for 10,000 new trees by 2030.
COS-S: Building Code Update	2,019	Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code. All new residential construction all-electric by 2030 with solar photovoltaic panels sized to offset annual electricity demand.
COS-W: Energy Efficiency and Conservation Program	5,042	Behavior change energy efficiency program results in residential energy savings; 5 percent reduction in commercial building energy use.
CTM-B: Initial Study Assessment Guidelines	<u>19,617</u> <del>5,042</del>	15 percent VMT reduction from new development (relative to a 2030 business as usual scenario) through incorporation of VMT thresholds into the ISAG pursuant to SB 743 implementation.
CTM-C: Vehicle Miles Traveled (VMT) Reduction Program	47,231	After accounting for the 15 percent VMT reduction from new development per CTM-B, this measure would achieve an additional 5 percent overall reduction in VMT by 2030, and 10 percent by 2040 (relative to 2030 and 2040 business as usual scenarios, respectively).
<b>Total</b>	<b><u>154,993</u> <del>168,065</del></b>	

Implementation of the quantified policies and programs in Table 4.8-5 would collectively provide reductions of 168,065 ~~151,903~~ MTCO<sub>2</sub>e by 2030, an approximate 9 ~~11~~ percent reduction from forecast 2030 levels and 40 ~~39~~ percent of the reductions needed to meet a target of 1,113,972 ~~1,138,708~~ MT CO<sub>2</sub>e for consistency with emissions targets identified in Policy COS-10.2 (41 percent below 2015 levels by 2030). An additional 242,748 ~~361,250~~ MT CO<sub>2</sub>e of reductions would be needed to close the gap with the 2030 target.

The analysis of Implementation Program COS-M on page 4.8-44 of the draft EIR has been corrected as shown below:

Under Implementation Program COS-~~LM~~, the County would evaluate the feasibility of an excise tax on oil and gas operations, which would be intended to partially fund the County’s response to climate change impacts. These taxes would presumably be in addition to fees already collected by the County for these activities. Before an oil excise tax could be levied, it would need to be approved by both the Board of Supervisors and at least a majority vote of the electorate.

Policy COS-7.2 was inadvertently included in Table 4.8-7 in the draft EIR, and the County has corrected this error to remove Policy COS-7.2 from Table 4.8-7, as shown below (page 4.8-45):

**Table 4.8-7 GHG-Reducing Policies Not Associated with Implementation Programs**

GP Policy Element	Policy
Land Use	LU-11.3, LU-11.4, LU-16.5, LU-16.9, LU-18.5
Circulation, Transportation	CTM-2.5, CTM-2.6, CTM-2.7, CTM-2.8, CTM-2.9, CTM-2.11, CTM-2.17, CTM-2.22, CTM-2.24, CTM-2.25, CTM-2.27, CTM-6.1, CTM-6.3, CTM-6.4, CTM-6.5, CTM-6.6, CTM-6.7
Public Facilities	PFS-1.10, PFS-2.2, PFS-2.3, PFS-2.6, PFS-5.5, PFS-5.6, PFS-6.4, PFS-7.2, PFS-7.6, PFS-12.4
Conservation	COS-1.13, COS-2.10, COS-3.3, COS-5.3, <del>COS-7.2</del> , COS-7.4, COS-7.8, COS-8.2, COS-8.3, COS-8.4, COS-8.10, COS-9.1, COS-9.3
Hazard	HAZ-10.1, HAZ-1.3, HAZ-1.4, HAZ-10.1, HAZ-10.5, HAZ-10.6, HAZ-10.7, HAZ-10.8, HAZ-11.9
Agriculture	AG-1.1, AG-3.2, AG-4.3, AG-4.4
Water	WR-4.4, WR-6.1, WR-6.2, WR-6.3
Economic Vitality	EV-4.4

For clarification, the language of Mitigation Measure GHG-1 beginning on page 4.8-45 is revised as follows:

Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential and New Commercial Development

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential and New Commercial Development**

To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential development

~~construction~~ through amendments to the Ventura County Building Code. This program shall also be extended to ~~include new commercial development building types such as including but not limited to offices, retail buildings, and hotels, where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.~~ The County ~~shall allow~~ may exempt certain new commercial development ~~to be exempt from these requirements where the County can make~~ upon making findings based on substantial evidence that ~~supports why~~ the use of natural gas is critical to business operations, and that it is not feasible<sup>1</sup> to replace critical appliances or equipment with electricity powered equivalents. This program shall be completed no later than 2023.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

The language of Mitigation Measure GHG-2 beginning on page 4.8-46 is revised as follows to clarify the County’s commitment to implementation:

Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings**

To address GHG emissions associated with electricity consumption by industrial buildings, which were not quantified in the GHG Inventory and Forecasting due to utility privacy rules, the County shall implement a program to adopt a Building Energy Saving Ordinance, no later than 2025, for industrial buildings over 25,000 square feet in size, modeled after the local benchmarking ordinances adopted in other local jurisdictions in California (CEC 2019). The County shall prepare reports showing the energy performance of industrial buildings relative to similar buildings in California and the United States and make these reports available to the public by request. The County, through ~~the~~ its building department shall provide recommendations on energy efficiency retrofits and green building strategies to improve energy performance to property owners and tenants subject to the reporting requirements.

The County has revised Mitigation Measure GHG-4 on page 4.8-47 to clarify the scope of its Greenhouse Gas Reduction Policy Enhancement Program and to clarify the membership and scope of the Climate Emergency Council, as provided below:

Mitigation Measure GHG-4: New Implementation Program ~~COS-X HAZ-X~~: Greenhouse Gas Reduction Policy Enhancement Program and Revised Implementation Program COS-CC: Climate Emergency Council

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program ~~COS-X HAZ-X~~: Greenhouse Gas Reduction Policy Enhancement Program**

The Climate Emergency Council (CEC) that would be established under COS-CC shall develop recommended subprograms which implement the 52 policies identified in Table 4.8-7~~8~~ of the draft EIR that do not have associated implementation programs in the 2040 General Plan. ~~Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors. This report shall be presented to the Board of Supervisors.~~

For any additional future policies that may be adopted as part of the County's Greenhouse Gas (GHG) Reduction Strategy (2040 General Plan, Policy COS-10.1), the CEC may recommend new subprograms. The CEC shall demonstrate in the materials submitted to the Board of Supervisors that the proposed subprograms and policies would result in quantifiable GHG emission reductions that further the County's progress towards achieving the 2030, 2040, and 2050 GHG reduction targets and goals established in the 2040 General Plan. The GHG emission reduction policy topics that may be considered and analyzed by the CEC for recommendation to the Board of Supervisors are identified in the Table 4.8-7 and include but are not limited to the following:

- Sustainable Technologies;
- Regional Bicycle Infrastructure;
- Funding and Maintenance for Sidewalks;
- Amtrak Service Improvements;
- Routine Use of Alternative Transportation Options;
- Permeable Pavement;
- Facilities for Emerging Technologies;
- Electric Vehicle Charging Stations;
- Neighborhood Electric Vehicles;
- Shared Mobility Operations;
- Sustainable Community Facility Design;
- Energy Efficient Facility Construction, Purchases, Leases, Retrofits, and Expansions;
- Agricultural Waste Reuse;
- Value-Added Alternatives to Waste Disposal;
- Smart Grid Development;

Consistent Fire Protection Standards for New Development;  
Soil Productivity;  
Incentives for Energy Efficiency;  
Battery Energy Storage Systems;  
Air Pollutant Reduction;  
Air Pollution Impact Mitigation Measures for Discretionary Development;  
Transportation Control Measures Programs;  
Alternative Transportation Modes;  
Urban Greening;  
Integrated Pest Management Practices;  
Technological Innovation; and  
Renewable Energy Facilities.

The CEC's recommended GHG reduction subprograms and policies shall be presented to the Planning Commission for review and recommendation to the Board of Supervisors, and then to the Board of Supervisors for consideration and approval, no later than 2025. The Board of Supervisors shall have sole authority to adopt (including as modified) and direct the County's implementation of the subprograms and policies that are developed and recommended by the CEC. Any CEC recommendation that would require amendments to the 2040 General Plan, County ordinances, policies or regulations shall be processed and approved by the County in accordance with all applicable legal requirements.

~~Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors. This report shall be presented to the Board of Supervisors by 2025.~~

The County shall also include the following revised implementation program in the 2040 General Plan.

**Implementation Program COS-CC: Climate Emergency Council**

The County shall establish a Climate Emergency Council (CEC) by a resolution of the Board of Supervisors to advise the Board of Supervisors on climate action planning and implementation of the Climate Action Plan (CAP) goals, policies, and programs.

The County agency or department responsible for implementation of this program shall draft, administer, and maintain the CEC bylaws. Initial establishment of the CEC and its bylaws shall include the following terms, duties, and membership composition:

- ▶ Term of each member is two years. At the conclusion of a term, a CEC member may be re-appointed or re-selected, as applicable, for a consecutive term by the appointing authority.

- ▶ Duties of the CEC members include attendance at duly called meetings; review, in advance, of all written material provided in preparation for CEC meetings; serve and participate on committees and/or sub-committees; and contribute to the CEC’s advisory recommendations to the Board of Supervisors;
- ▶ The officers of the CEC shall be Chairperson and Vice-Chairperson.
  - Officers shall be elected annually at regular meeting each year by CEC members. Nomination shall be made from the floor. Election shall be by simple majority.
  - Officers shall serve a one-year term. An officer may be re-elected, but no individual shall serve more than three full consecutive terms in the same office. No member shall hold more than one office at a time.
  - The Chairperson shall preside at all meetings of the CEC, sign all correspondence, reports, and other materials produced by the CEC, and perform any and all other duties prescribed by the CEC from time to time. The Chairperson may serve as an ex-officio member of all committees.
  - The Vice-Chairperson shall represent the Chairperson and/or substitute in performance of the Chairperson during their absence.
- ▶ Membership of the CEC shall be comprised of the following:
  - One person representing each Supervisorial District who has demonstrated interest in and knowledge of climate action planning shall be nominated by each of the five members of the Board of Supervisors, and confirmed by a majority of the Board of Supervisors resulting in a total of five Supervisorial District representatives;
  - One resident from each of the designated disadvantaged communities identified in the 2040 General Plan who has demonstrated an understanding of their community’s needs as well as an interest in and knowledge of climate action planning shall be appointed by a majority of the Board of Supervisors; and
  - Two additional at-large members who have demonstrated special interest, competence, experience, or knowledge in climate action planning shall be selected by a majority of the CEC members.
  - Each member is entitled to one vote on each matter submitted to a vote of the CEC.

For clarification, the second paragraph on page 4.8-49 is revised as follows:

With the modest amount of forecast future growth in the county, substantial GHG reductions would need to be derived from measures targeting existing development,

infrastructure, and associated activity levels. Most emissions that are forecast to occur in the county are from energy use in existing buildings, vehicle use and travel behavior influenced by the existing land use pattern and transportation systems, landfilled waste, and established agricultural operations. While the County encourages and promotes the reduction of or changes to these activities contributing to GHG emissions, it may decide that certain mitigation measures are infeasible based, for example, on their ~~does not have the authority to enforce measures that may potentially~~ infringement upon private property rights, reduction in the economic competitiveness of local businesses, or inhibition on the ability for residents to travel between residences, jobs, and amenities. Pursuant to Section 15093 of the State CEQA Guidelines, CEQA requires the lead agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. These factors are considered by the decision-making body of the lead agency following certification of the EIR and prior to making a decision about whether to approve the project ~~constrain the ability for the County to reduce GHG emissions from existing activities through additional mitigation measures.~~

For clarification, the following edit is made to the discussion on page 4.8-50:

However, for these reasons and those described in Impact 4.8-1, the County cannot meaningfully quantify the effect of all its 2040 General Plan policies and programs on future GHG emissions, and ~~there~~ therefore, it cannot conclude, at this program level of analysis, that future GHG emissions in the county under the 2040 General Plan would be sufficiently reduced to meet the State's 2030 or post-2030 targets.

For clarification, the following edit is made to the discussion on page 4.8-52:

However, due to the County's minimal growth, most of the forecast GHG emissions in 2030 and beyond are caused or influenced by ~~from~~ energy use in existing buildings, vehicle use and travel behavior on existing transportation systems, landfilled waste, and agricultural uses where the County has limited authority to enforce stringent actions resulting in GHG reductions beyond what have been already been included in the 2040 General Plan and the mitigation measures identified in Impact 4.8-2.

### 3.13 REVISIONS TO SECTION 4.9: HAZARDS, HAZARDOUS MATERIALS, AND WILDFIRE

No revisions have been made to this section of the draft EIR.

### 3.14 REVISIONS TO SECTION 4.10: HYDROLOGY AND WATER QUALITY

To provide clarification, the first full sentence on page 4.10-21 is revised to read:

Lastly, the County has existing regulations, such as the Ventura County Flood Plain Management Ordinance 4521, the Ventura County Flood Control District Design Manual

and the Ventura County Watershed Protection District's 2017 Design Hydrology Manual 2006, that also address flood control and drainage facilities.

The third sentence in the second paragraph on page 4.10-21 is revised to read:

The County's existing regulations, such as the Ventura County Flood Plain Management Ordinance 4521, the Ventura County Flood Control District Design Manual and the Ventura County Watershed Protection District's 2017 Design Hydrology Manual 2006, also address flood control and drainage facilities and implement design standards to ensure that no overflow of watercourses would occur that would result in flooding.

### 3.15 REVISIONS TO SECTION 4.11: LAND USE AND PLANNING

To provide clarification, the third sentence in the second paragraph on page 4.11-19, and Table 4.11-1, on pages 4.11-19 and 4.11-20, are revised as follows:

The 2040 General Plan would accommodate future development primarily within existing unincorporated communities. By making refinements to the Existing Community and Urban land use designations of the existing general plan, the 2040 General Plan would more clearly distinguish among land uses allowed within each designation and set forth maximum development density and intensity standards. Specifically, the 2040 General Plan would establish ~~43~~15 new land use designations that provide more detailed information on the types of land uses (e.g., commercial, industrial, residential) that would be allowable within areas currently designated as Existing Community and Urban (Table 4.11-1). The refined land use designations of the 2040 General Plan would result in future development that is compatible with the land uses, densities, and parcel sizes of existing communities.

**Table 4.11-1 Existing General Plan Land Use Designations and Proposed New General Plan Land Use Designations**

Acronym	Land Use Designation	Max. Density/ Intensity	Min. Lot Size
<b>Existing General Plan Land Use Designations to Remain</b>			
RUR	Rural	1 du/2 ac (1 dwelling unit per each 2 acres)	2 acres
AG	Agricultural	1 du/40 ac	40 acres
OS	Open Space	1 du per parcel	10 acres, or 20 acres if contiguous w/Agricultural
P	State or Federal Facility (updated to State, Federal, and Other Public Lands)	N/A	None
<b>Proposed New Land Use Designations (to be applied only to areas with current Existing Community or Urban land use designations)</b>			
ECU-R	ECU-Rural	1 du/2 ac	2 acres
ECU-A	ECU-Agricultural	1 du/40 ac	40 acres
ECU-OS	ECU-Open Space	1 du per parcel	10 acres, or 20 acres if contiguous w/Agricultural
VLDR	Very Low Density Residential	3 du/ac	10,000 SF
LDR	Low-Density Residential	5 du/ac	6,000 SF



Acronym	Land Use Designation	Max. Density/ Intensity	Min. Lot Size
MDR	Medium-Density Residential	13 du/ac	3,000 SF
RHD	Residential High-Density	20 du/ac	No Minimum
RPD	Residential Planned Development	20 du/ac	No Minimum
<u>CRPD</u>	<u>Coastal Residential Planned Development</u>	<u>36 du/ac</u>	<u>No Minimum</u>
<u>RB</u>	<u>Residential Beach</u>	<u>36 du/ac</u>	<u>No Minimum</u>
MU	Mixed Use	20 du/ac; 60% coverage	No Minimum
C	Commercial	60% coverage	No Minimum
CPD	Commercial Planned Development	60% coverage	No Minimum
I	Industrial	50% coverage	10,000 SF
PR	Parks & Recreation	N/A	N/A

For the purpose of clarity, the second and third sentences on page 4.11-21 are revised as follows:

For example, Policies LU-4.1 and LU-4.2 would reduce incompatible land uses by requiring that the County specifying densities and/or intensities of allowed uses within each land use designation and maintaining continuity with neighboring zoning, land uses, and parcel sizes. Policies LU-6.1, LU-7.1 through 7.3, and LU-8.1 through LU-8.4 reduce incompatible uses within agricultural areas by requiring specifying buffers for non-agricultural use, and specifying allowable coverage, and allowable uses within those areas.

### 3.16 REVISIONS TO SECTION 4.12: MINERAL AND PETROLEUM RESOURCES

The following discussion is added under the subheading “California Public Utilities Commission General Order No. 112-F, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems” in Section 4.12.1, “Background Report Setting Updates,” on page 4.12-3:

California Geologic Energy Management Division (CalGEM) has the responsibility for approving oil and gas well activities in California. In a comment letter to Ventura County’s draft EIR on the General Plan Update, CalGEM specified certain of its regulatory authorities for inclusion in the final EIR. As indicated in Public Resources Code section 3106, CalGEM has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas and geothermal deposits and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM’s authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties. CalGEM does not regulate grading, excavations, or other land use issues. Other items specified by CalGEM include the following.

#### Well Stimulation and Underground Injection.

CalGEM oversees well stimulation treatments and underground injection control. Under the Safe Drinking Water Act, EPA has delegated authority over oil and gas injection

wells to the CalGEM UIC Program. CalGEM collaborates with the State and Regional Water Board to ensure that any useful water is protected.

#### Well and Lease Restoration Requirements

CalGEM enforces well site and lease restoration through CCR Title 14, Section 1776, including that well sites be returned to as near a natural state as practicable within 60 days of plugging and abandonment of any oil and gas well, and oil lease restoration to include the removal of all tanks, above-ground pipelines, debris, and other facilities and equipment. Lease restoration must begin within three months and completed within one year after the plugging and abandonment of the last wells on the lease.

#### Pipelines

With respect to pipelines, CalGEM's jurisdiction typically stops at the lease automatic custody transfer unit. CCR require "newly installed pipelines shall be designed, constructed, and all pipelines shall be tested, operated, and maintained in accordance with good oil field practice and applicable methods approved by the Supervisor." CCR also outlines the requirement for submission of pipeline management plans by operators to CalGEM.

#### Flaring

State PRC section 3300 states that "the unreasonable waste of natural gas by the act, omission, sufferance, or insistence of the lessor, lessee, or operator of any land containing oil or gas or both, whether before or after the removal of gasoline from the gas, is opposed to the public interest and is unlawful."

#### Identification of Abandoned Wells Prior to Development

Public Resources Code section 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development of construction activities. Local permitting agencies, property owners, and developers should be aware of, and fully understand that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells. In summary, CalGEM categorically advises against building over, or in any way impeding access to oil, gas, or geothermal wells. PRC section 3208.1 gives CalGEM the authority to order or permit the reabandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM.

For clarification, the second and third paragraphs on page 4.12-9 will be revised as follows:

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, greenhouses, as principal and accessory structures related to agriculture, and also oil and gas wells exploration and production, all of which would apply to approximately 0.9 percent of land in the unincorporated county.

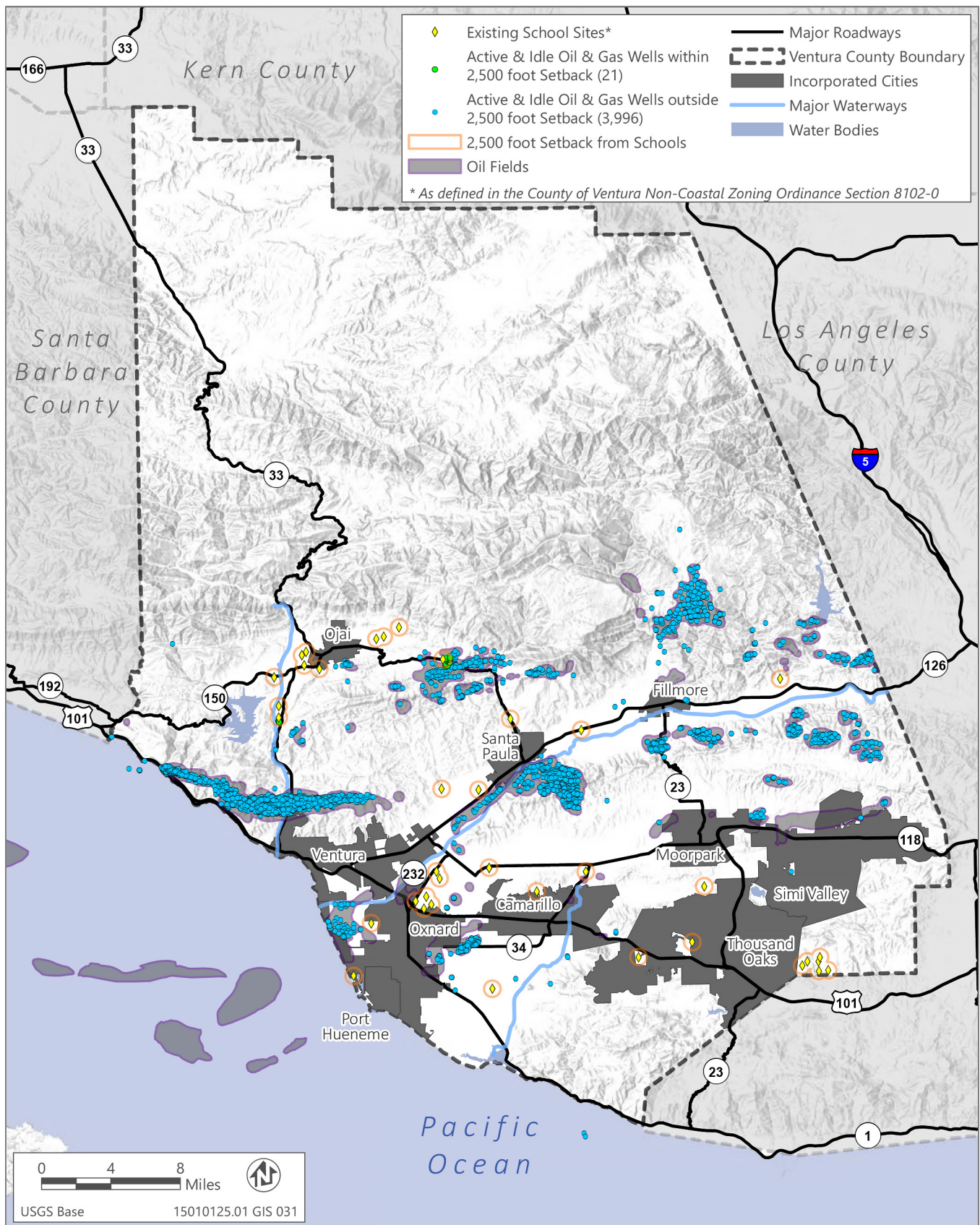
Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low

intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells exploration and production. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, as principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

The last sentence of the second paragraph on page 4.12-14 in Section 4.12, "Mineral and Petroleum Resources," is revised as follows:

As shown in Figures 4.12-1 and 4.12-2, there are currently 21 ~~23~~ active and idle oil wells within 2,500 feet of existing schools and 715 active and idle oil wells within 1,500 feet of existing dwelling units in the unincorporated county.

Figure 4.12-1 on page 4.12-15 has been revised to remove Thomas Aquinas College and update the footnote, as shown below.



Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Revised Figure 4.12-1 Oil and Gas Well 2,500-ft Setback from Schools Map

For consistency, the language of Policy COS 7.2 in Mitigation Measure PR-1 on page 4.12-18 has been revised to delete the reference to gas wells as follows:

**Mitigation Measure PR-1: Revised Policy COS-7.2: Oil Well Distance Criteria**

The County shall include the following revised policy in the 2040 General Plan.

**COS-7.2: Oil Well Distance Criteria**

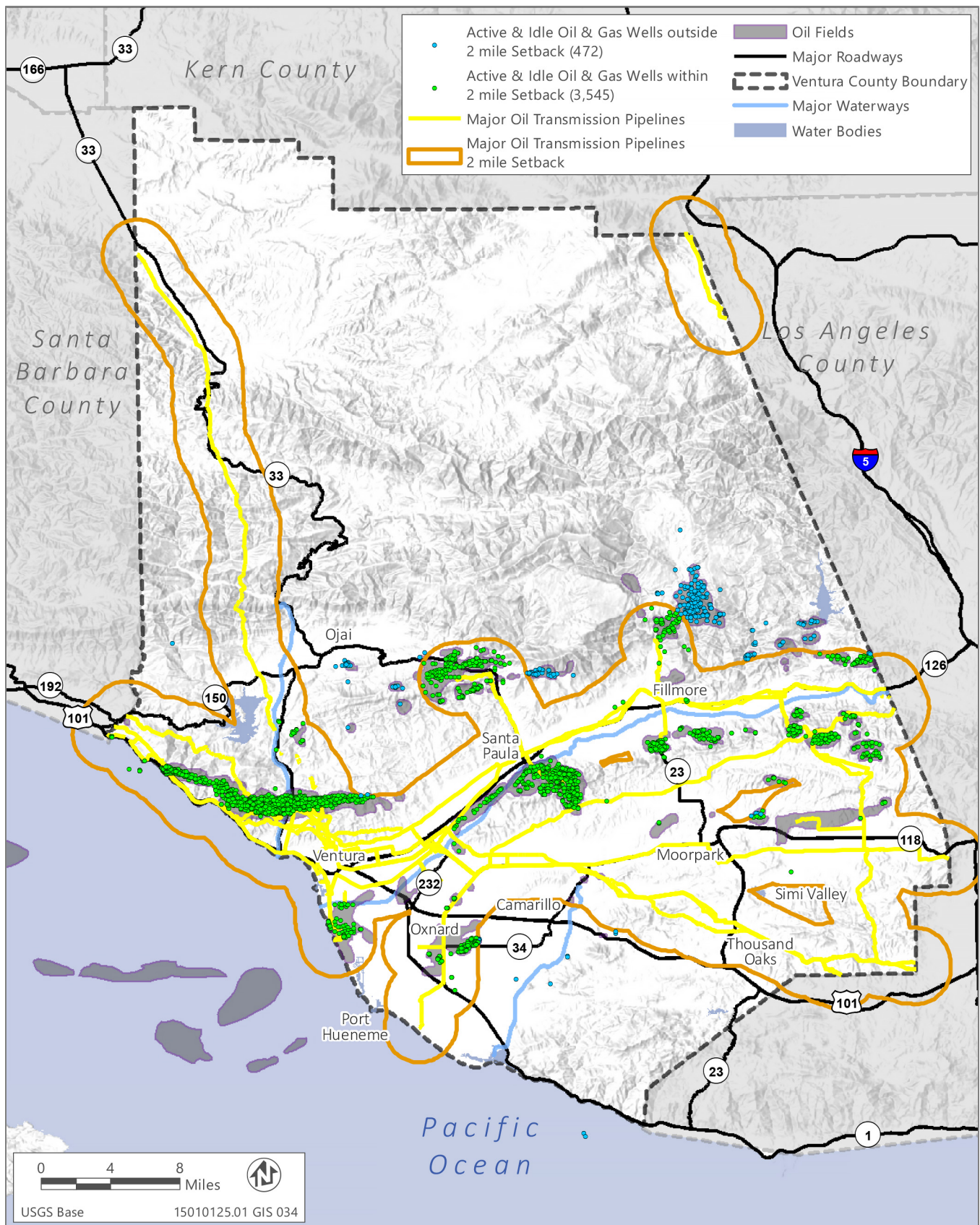
The County shall require that new discretionary oil ~~and gas wells to be located~~ be sited a minimum of 1,500 feet from the well head to residential dwellings, dwelling units, and 2,500 from any school sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines.

For clarity, the second paragraph on page 4.12-22 is revised to read:

As discussed above, Figure 4.12-3 depicts the oil fields within Ventura County, active and idle oil and gas wells, and the eleven zone classifications which allow for oil and gas exploration and production as a conditionally permitted land use that is potentially compatible with dwelling units and schools. Future oil and gas extraction within compatible zone classifications with minimum parcel sizes of 10,000 and 20,000 square feet may be hampered or access to petroleum reserves precluded as these zones have smaller minimum lot sizes which provide less flexibility in the siting of allowed uses and allow for greater maximum lot coverage which may inhibit compliance with the setback distances prescribed in Policy COS-7.2. Furthermore, as shown in Figures 4.12-1 and 4.12-2, there are currently 21 ~~23~~ active and idle oil wells within 2,500 feet of existing schools and 715 active and idle oil wells within 1,500 feet of existing dwellings in the unincorporated county. Future discretionary expansion of oil production within the setback distances depicted on Figures 4.12-1 and 4.12-2 would be prohibited pursuant to Policy COS-7.2. Policy COS-7.2 could theoretically affect local oil and gas exports and increase the reliance on imports from outside of the 2040 General Plan area. There are no actions or policies that the County could feasibly mandate to fully reduce the impact that Policy COS 7.2 would have on hampering or precluding access to petroleum resources. This impact would remain **significant and unavoidable**.

Figure 4.12-4 (Major Oil Transmission Pipeline Map) on page 4.12-25 has been revised, as shown below, to remove the incorporated cities layer that previously obscured the oil fields.





Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Revised Figure 4.12-4 Major Oil Transmission Pipelines Map

Mitigation Measure PR-2 and Mitigation Measure PR-3 on page 4.12-31 have been revised as shown below to provide a definition for the term “feasible:”

Mitigation Measure PR-2: Revised Policy COS-7.7: Limited Conveyance for Oil and Produced Water  
The County shall include the following revised policy in the 2040 General Plan.

**Policy COS-7.7: Limited Conveyance for Oil and Produced Water**

The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible.<sup>1</sup>; ~~oil and produced water shall not be trucked.~~ Trucking of crude oil and produced water may only be allowed if the proponent demonstrates, subject to approval by the County, that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

Mitigation Measure PR-3: Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal  
The County shall include the following revised policy in the 2040 General Plan.

**Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal**

The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, if feasible.<sup>1</sup> ~~Flaring or venting shall~~ may only be allowed if the proponent demonstrates, subject to approval by the County, that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency ~~or~~ and for testing purposes consistent with federal, State, and local regulations.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

### 3.17 REVISIONS TO SECTION 4.13: NOISE AND VIBRATION

For clarification, Mitigation Measure NOI-1 on page 4.13-23 is revised as follows to define the term “feasible:”

Mitigation Measure NOI-1: New Policy HAZ-X: Implement Noise Control Measures for Traffic Noise  
The County shall include the following new policy in the 2040 General Plan.

**Policy HAZ-X: Implement Noise Control Measures for Traffic Noise**

The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist:

The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ-9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or,

The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ-9.2.

Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development’s fair share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible<sup>1</sup> noise reduction measures shall be implemented to ensure the development’s fair share of traffic-generated noise is reduced, consistent with Policy HAZ-9.2.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.



For clarification, Mitigation Measure NOI-3 beginning on page 4.13-27 is revised as follows to define the term “feasible:”

Mitigation Measure NOI-3: New Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan**

The County shall revise the Construction Noise Threshold Criteria and Control Plan within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive groundborne noise. Items that shall be addressed in the plan include, but are not limited to, the following:

Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays.

If pile driving is used, pile holes shall be predrilled to the maximum feasible<sup>1</sup> depth to reduce the number of blows required to seat a pile.

All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.

Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible.<sup>1</sup> The total vibration level produced could be significantly less when each vibration source is operated at separate times.

Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (i.e., 100 feet) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.

Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet) can be breached only if a

project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB.

All vibration-inducing activity within the distance parameters described above shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels.

Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, nondisplacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible<sup>1</sup> to reduce vibration levels.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

### 3.18 REVISIONS TO SECTION 4.14: POPULATION AND HOUSING

No revisions have been made to this section of the draft EIR.

### 3.19 REVISIONS TO SECTION 4.15: PUBLIC SERVICES AND RECREATION

No revisions have been made to this section of the draft EIR.

### 3.20 REVISIONS TO SECTION 4.16: TRANSPORTATION AND TRAFFIC

Mitigation Measure CTM-1 on page is revised to define the term “feasible:”

Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim Vehicle Miles Traveled CEQA Assessment Criteria

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program CTM-X: Interim Vehicle Miles Traveled CEQA Assessment Criteria**

Following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not otherwise exempt from CEQA analysis) shall be evaluated for

potential environmental impacts relative to VMT using the State’s minimum reduction standards, as follows:

<u>Project Type</u>	<u>Measurement Unit</u>	<u>Model Trip Types</u>	<u>Minimum Criteria</u>	<u>Baseline VMT</u>	<u>Threshold VMT</u>
<u>Residential</u>	<u>VMT/Capita</u>	<u>Average of all Home Based Trip Types</u>	<u>15% Reduction of Regional Average</u>	<u>9.66</u>	<u>8.21</u>
<u>Office</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Industrial</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Retail</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Agriculture</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Infrastructure</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>All Other Project Types</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>

If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible,<sup>1</sup> by modifying the project’s VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes). Following completion and adoption of VMT thresholds as part of the Ventura County ISAG, this implementation program shall no longer apply.

1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21066.1) and the CEQA Guidelines (§ 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

To clarify the performance standards, Mitigation Measures CTM-2 and CTM-3 on draft EIR pages 4.16-27 and 4.16-28 are revised as follows:

Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines

The County shall include the following revised implementation program in the 2040 General Plan.

#### **Implementation Program CTM-B: Initial Study Assessment Guidelines**

The County shall update and adopt its’ Initial Study Assessment Guidelines (ISAG) no later than 2025 to address Vehicle Miles Traveled (VMT) and safety metrics

pursuant to CEQA Guidelines Section 15064.3. This program shall consider inclusion of the following components:

- ▶ Establishment of screening criteria to define projects not required to submit detailed VMT analysis, such as infill projects, inclusion of locally serving commercial, transit supportive projects, or transportation enhancements that reduce VMT;
- ▶ Establishment of thresholds of significance for identifying VMT related transportation impacts (to meet or exceed State requirements; at minimum the thresholds will be equivalent to the threshold values for different project types identified in Mitigation Measure CTM-1);
- ▶ Standard mitigation measures for significant transportation impacts; and
- ▶ Specify the County's procedures for reviewing projects with significant and unavoidable impacts, under CEQA, related to VMT.

Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program

The County shall include the following revised implementation program in the 2040 General Plan.

### **Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program**

To support climate change related goals and CEQA related VMT policies pursuant to SB 743 (2013), the County shall develop a VMT Reduction Program no later than 2025. This program ~~should~~ will contain a range of project- and program-level mitigation measures and VMT reduction strategies, that could include:

- ▶ Preparation of a Transportation Demand Management (TDM) program to promote mode shifts from single occupant vehicle use to transit, ridesharing, active transportation, telecommuting, etc.; and,
- ▶ Transportation System Management applications such as park-and-ride lots, intelligent transportation system (ITS) field deployment, pavement management, etc.

This program shall identify measures to achieve an additional five percent overall reduction in VMT by 2030, and 10 percent by 2040 (relative to 2030 and 2040 business as usual scenarios, respectively). During implementation of the 2040 General Plan, the County ~~shall~~ will review and update the VMT Reduction Program as warranted to provide additional mitigation measures and programs that achieve these levels of VMT reduction.

### 3.21 REVISIONS TO SECTION 4.17: UTILITIES

To provide clarification, the following text is added to Section 4.17.1, “Background Report Setting Updates,” under the subheading “Environmental Setting,” on page 4.17-1:

Water Purveyors – Calleguas Municipal Water District

Most of Ventura County residents (approximately three quarters) rely on Calleguas Municipal Water District (MWD) for at least a portion of their potable water supply. Calleguas MWD distributes high quality drinking water to 19 cities, local water agencies, and investor-owned and mutual water companies (listed below) throughout southeast Ventura County. These retail purveyors receive water through 140 miles of large-diameter pipeline operated and maintained by Calleguas MWD. In turn, these purveyors deliver water to area residents, businesses, and agricultural customers. Only a small portion of the water (approximately 5 percent) is used for agricultural purposes. Agricultural demands are generally met by other agencies or private entities using untreated surface water, recycled wastewater, and groundwater from various basins underlying the area (Calleguas MWD 2016).

The following water purveyors obtain all or a portion of their water from Calleguas MWD:

Berylwood Heights Mutual Water Company  
Brandeis Mutual Water Company  
Butler Ranch Mutual Water Company  
California-American Water Company  
California Water Service Company  
Camrosa Water District  
City of Camarillo  
City of Oxnard  
City of Port Hueneme  
City of Thousand Oaks  
Crestview Mutual Water Company  
Golden State Water Company  
Oak Park Water District  
Pleasant Valley Mutual Water Company  
Solano Verde Mutual Water Company  
Ventura County Waterworks District No. 1 (VCWWD No. 1)  
Ventura County Waterworks District No. 8 (VCWWD No. 8)  
Ventura County Waterworks District No. 19 (VCWWD No. 19)  
Ventura County Waterworks District No. 38 (VCWWD No. 38) – formerly  
Lake Sherwood Community Services District (CSD)  
Zone Mutual Water Company

Additionally, the following text is added to Section 4.17.1, “Background Report Setting Updates,” under the subheading “Environmental Setting,” on page 4.17-1:

Water Supply and Demand

In 2020, the Casitas Municipal Water District reported 99,836 acre-feet (AF) of available surface water supplies from Lake Casitas. The City of Ventura draws approximately 20 percent of its water resources from the Ventura River. The estimated annual water

supply in the Ventura River Watershed is 157,436 AF and the estimated annual demand is 14,508 AF.

The Calleguas Municipal Water District supplies the City of Oxnard with imported water from the Santa Clara River Watershed. In 2018, this water comprised 45 percent of the City's total supply.

To provide clarification, the average dry weather flow and level of treatment in the City of Oxnard presented in Table 4.17-1 on page 4.17-2 has been revised as shown below.

**Table 4.17-1 Wastewater Treatment Capacity, Ventura County**

Agency	Total Number of Connections	Rated Capacity (MGD <sup>1</sup> )	ADWF <sup>2</sup> (MGD)	Treatment Level
County Service Area No. 29	307	N/A	0.085	Tertiary
County Service Area No. 30	274	N/A	0.2	Tertiary
County Service Area No. 32	N/A	N/A	N/A	N/A
County Service Area No. 34	1,364	N/A	N/A	Tertiary
Camarillo Utility Enterprise	57	N/A	0.0356	Tertiary
Todd Road Jail	N/A	0.08	0.044	Secondary
Ventura County Waterworks District No. 1	10,000 (37,000 population)	5	2	Tertiary
Ventura County Waterworks District No. 16	544 (2,000 population)	0.5	N/A	Secondary
Camarillo Sanitary District	70,000 (population, city and unincorporated)	7.25	4	Tertiary
Ojai Valley Sanitary District	20,000 (customers)	3	1.4	Tertiary
Saticoy Sanitary District	271	0.25	0.1	Secondary
Triunfo Sanitation District	12,300	16	9	Tertiary
Camrosa Water District	6,900	1.5	1.4	Tertiary
Channel Islands Beach Community Services District	1,800	N/A	N/A	N/A
City of Oxnard	40,000	32.7	<del>47.20</del>	<del>Tertiary</del> <u>Secondary</u>
City of Simi Valley	40,000 (527 unincorporated)	12.5	7.8	Tertiary
City of Thousand Oaks	130,000 (population)	14	8	Tertiary
City of Ventura	25,528	14	7.1	Tertiary

Notes: N/A= data is not available because the County does not provide sewer service or treatment; MGD=Million Gallons per Day; ADWF= Average Dry Weather Flow.

Source: Appendix B (Table 7-2) with updated service connection numbers from Public Works Agency Water and Sanitation customer database and updated treatment plant levels provided by Joseph Pope, Director, Water and Sanitation Department.

In addition, Ventura County Water Works District No. 38 has been added to Table 4.17-2 on page 4.17-15, as indicated below.

**Table 4.17-2 Existing Water Supplies and Demands**

<b>Watershed</b>	<b>Municipal Water Suppliers</b>	<b>Other Water Suppliers</b>	<b>Water Supplies</b>	<b>Annual Water Demand</b>
Ventura River	Casitas Municipal Water District Ventura Water Golden State Water Company Ventura River Water District Meiners Oaks Water District	11 mutual water companies	23,051 AF Surface Water 14,600 to 21,300 AF Groundwater (37,700 – 44,400 AF total)	32,700 AF
Cuyama	None	None	22,000 AF	10,000 AF agriculture/8 AF domestic
Santa Clara River	Castaic Lake Water Agency City of Fillmore City of Oxnard City of Santa Paula United Water Conservation District Ventura Water	74 smaller water systems and irrigation companies	12,000 AF Imported Water 10,200 to 19,700 AF Recycled Water 136,400 to 171,000 AF Groundwater (158,400 – 202,700 AF Total)	182,600 AF
Calleguas Creek	Calleguas Municipal Water District City of Simi Valley/Ventura Co. Waterworks City of Oxnard City of Thousand Oaks City of Camarillo Port Hueneme Water Agency Camrosa Water District Ventura County Waterworks District No. 1 Ventura County Waterworks District No. 19 <u>Ventura County Water Works District No. 38</u> Triunfo Water and Sanitation District California American Water Company – Ventura District California Water Service Company – Westlake District Golden State Water Company – Simi Valley Pleasant Valley Mutual Water Company Crestview Mutual Water Company Zone Mutual Water Company	52 small water systems and irrigation companies	11,324 AF Surface Water 119,417 AF Imported Water 13,931 Recycled Water 51,300 to 82,300 AF Groundwater (196,000 – 227,000 AF total)	224,660 AF <sup>1</sup>

Note: AF=acre-feet.

1: Calleguas Municipal Water District imports water into the watershed through the State Water Project to meet basin demand in most years.

Source: Appendix B

Mitigation Measure UTL-1 on page 4.17-18 is revised as follows:

**Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years**

Water-demand projects (as defined in Section 15155 of the State CEQA Guidelines) that require service from a public water system shall prepare a water supply assessment prior to project approval. If the projected water demand associated with the project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment must address the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years for a 20-year projection. The assessment shall describe if the new water service will be sufficiently met under this 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected public water system and the County. ~~If, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the County its plans for acquiring additional water supplies.~~ A water-demand project that includes a new water service from a public water system shall not be approved unless adequate water supplies are demonstrated.

### 3.22 REVISIONS TO CHAPTER 5: CUMULATIVE IMPACTS

No revisions have been made to this chapter of the draft EIR.

### 3.23 REVISIONS TO CHAPTER 6: ALTERNATIVES

To provide clarification, the description of Alternative 2 in the third paragraph under in Section 6.5.2, "Alternative 2: Existing Community and Urban Area Designations Alternative," on page 6-15 is revised to read:

However, the land use diagram of this alternative would be different from the 2040 General Plan in the following ways. ~~Very Low Density or Low Density Residential lands outside of the Existing Community area designation (boundary) and Urban area designation (boundary) would remain the same as under the 2040 General Plan.~~ Very Low Density or Low Density Residential lands located within the Existing Community area designation (boundary) and Urban area designation (boundary) would be designated as Medium-Density Residential or Residential High-Density.

### 3.24 REVISIONS TO CHAPTER 7: OTHER CEQA CONSIDERATIONS

No revisions have been made to this chapter of the draft EIR.