City of Ventura

Parklands Specific Plan

Final

Environmental Impact Report

SCH # 2008031082

Volume I: Text

June 2009

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June 2009

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City of Ventura
Parklands Specific Plan

Environmental Impact Report

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EXECUTIVE SUMMARY

The Draft EIR was available for public review from December 5, 2008 through January 20, 2009. During this time, written comments were forwarded to:

Lead Agency:	City of San Buenaventura
Contact Person:	Iain Holt, Senior Planner
Address:	501 Poli Street PO Box 99 Ventura, California 93002
Phone:	(805) 653-0763
E-mail:	IHolt@ci.ventura.ca.us

The Draft EIR and supporting documents were also available for review at the Planning Counter at 501 Poli Street, Ventura, CA 93002. During the public review period, ten written comment letters were received on the Draft EIR (DEIR). Those comment letters and responses to the comment letters are contained in Section 8.0 Addenda and Errata/ Responses to Comments. The Final EIR for the Parklands Specific Plan presents modifications to the DEIR text as a result of further informational clarifications. Changes to the EIR are documented in Section 8.0 Addenda and Errata/ Responses to Comments. Within Section 8.0, deletions are noted by ~~strikeout~~ and insertions by underline. Individual typographical corrections are not specifically called out. The main body of the remainder of this EIR shows the final language inclusive of changes without the strikeout and underline format.

This section summarizes the characteristics of the proposed Parklands Specific Plan, alternatives, environmental impacts associated with the specific plan, recommended mitigation measures, and the level of significance of impacts after mitigation.

PROJECT SYNOPSIS

Project Proponent

Westwood Communities Corporation
1263 Westwood Boulevard, Suite 210
Los Angeles, CA 90024

Project Description

Project Characteristics

The proposed project consists of the Parklands Specific Plan (Specific Plan No. 6) to guide future development within the plan area. Development under the Parklands Specific Plan would include predominantly residential uses, with supporting infrastructure, green-space, community recreational space, and a small amount of service commercial development. Development potential under the specific plan includes up to 499 residential units, 25,000 square feet of commercial space, a 6, 560 square foot community center, 11.62 acres of parks and open space, and potential for live-work uses to be developed in lieu of condominiums.

Specific plan improvements are designed to reduce existing flooding impacts at the intersection of Blackburn Road with Wells Road and to facilitate extension of the Carlos Street extension through the plan area from Wells Road to Saticoy Avenue. Additional improvements to the surrounding circulation system include pedestrian and bicycle amenities along Telegraph Road and Wells Road.

Project Objectives

The primary objective of the proposed Parklands Specific Plan is to create a financially viable traditional neighborhood that embodies the principles of New Urbanism through emphasizing the public realm, creating pedestrian friendly streets and blocks, and providing a diversity of uses and building types that will generate a distinct sense of neighborhood identity. Parklands is one of the first Traditional Neighborhood Development in the City of Ventura and is intended to bring together New Urbanist ideals, city planning, and livable spaces.

Required Approvals

Implementation of the proposed Parklands Specific Plan would require the following discretionary approvals from the City and other agencies:

Required Discretionary City Approvals

- *Certification of the EIR*
- *Annexation, Case No. A-327 for the following three parcels totaling 54.36 acres*
  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*
- *Specific Plan Approval, Case No. SP-6*
- *Zone Change for City designated parcels (R-1-7 to SP-6) and prezoning for County designated parcels (SP-6), Case No. Z-916*
- *General Plan Amendment ~~AO-227~~ MP-161 to amend Figures 3.5 and 4.3 of the General Plan to allow the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the short term, while retaining the future widening to arterials standards in the long term.*
- *Tentative Tract Map S-5632*
- *Design Review, Case No. ARB-2985*
- *Planned Development Permit, Case No. PD-861*

Discretionary Approvals Required from Other Agencies

- *Ventura County Local Agency Formation Commission - LAFCO approval of reorganization, including annexation to the City of Ventura for the following three parcels totaling 54.36 acres, with simultaneous detachment of the same area from the Ventura County Resource Conservation District and the Ventura County Fire Protection District*
  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*

- *Ventura County Watershed Protection District approval of modifications to Brown Barranca*
- *Department of Fish and Game Streambed Alteration Agreement*
- *U.S. Army Corps of Engineers 404 permit*
- *Caltrans Encroachment Permit for any work in the SR 126 and SR 118 right-of-way*

ALTERNATIVES

This EIR examines three alternatives, as described below.

- Alternative 1: No Project (no development - no change to existing land uses)
- Alternative 2: Existing General Plan/Zoning Alternative
- Alternative 3: Barranca Avoidance. This alternative would leave the barranca in its current state.

Each of the alternatives would be superior to the proposed project in at least one way. However, there are no project-generated impacts that cannot be mitigated to a level that is less than significant.

AREAS OF PUBLIC CONTROVERSY

Areas of public controversy include the size of the development (499 units), modifications to Brown Barranca, and the change in land use. Comments raised subsequent to the notice of preparation include loss of agricultural resources, climate change analysis, construction emissions, carbon monoxide screening, cultural resources, increased runoff, flood protection, pedestrian and traffic circulation, and water supply. These issues are discussed in the initial study and in the EIR as appropriate. Table 1-1 in Section 1.0 *Introduction* lists these comments and the location where they were addressed.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table ES-1 lists the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts. Impacts are categorized by classes. Class I impacts are defined as significant, unavoidable adverse impacts, which require a statement of overriding considerations pursuant to Section 15093 of the *CEQA Guidelines* if the project is approved. There are not Class I impacts associated with the proposed project. Class II impacts are significant adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the *CEQA Guidelines*. Class III impacts are adverse, but less than adopted significance thresholds. Class IV effects are those where there is no impact or the effect would be beneficial.

As noted in Table ES-1, all of the project generated impacts can be mitigated to a less than significant level through implementation of proposed policies and actions.

Class II, Significant but Mitigable, Impacts

- **Aesthetics –** The sound wall along the north side of SR 126 proposed as mitigation for noise impacts would partially obscure views to the north and would expose SR 126 travelers to the massing associated with an uninterrupted block wall. It would also contribute to a cumulative change to views along the SR 126 corridor. This impact can be mitigated to below a level of significance through incorporation of landscaping components into the sound wall design.
- **Air Quality -** Operational emissions of ROG and NOx from structures and vehicles would exceed Ventura County Air Pollution Control District thresholds. The impact can be mitigated through increasing energy efficiency 20% beyond Title 24 and through payment of fees to an air quality mitigation fund.
- **Wildlife Resources -** Temporary adverse effects on special status wildlife during and after construction if present due to vegetation removal, culverting of a portion of the barranca and the amount of time necessary for replacement vegetation to mature. This impact is mitigated through performance of pre-construction surveys for special status species including arroyo chub, southwestern pond turtle, two-striped garter snake, San Diego mountain kingsnake, and California red legged frog (none of which have been observed on any of the surveys) by a qualified biologist. Additional mitigation includes construction timing to avoid the breeding bird season and pre-construction surveys for nesting birds.
- **Wetlands –** Specific plan development would result in 1.63 acres of wetland impacts and replacement. This impact is mitigated by invasive plant removal and barranca restoration, wetland creation and maintenance.
- **Urban Impacts to Wildlife Habitat -** Development would introduce noise, lighting, and domestic animals adjacent to wildlife habitat and could increase the potential for erosion and sedimentation. This impact is mitigated through the installation of erosion control devices during and after construction, addition of split rail fencing along the top of bank, biological resource signage and installation of oil/grease traps and use of LID practices to cleanse water prior to discharging to the waterway.
- **Archaeological Resources –** though no archaeological resources were observed or are thought to be present based on the archaeological report that was prepared for the project, there is potential to find as yet undiscovered resources. This impact is mitigated through halting work in the vicinity and evaluation of any resources that would be inadvertently discovered. Adherence to health and safety code requirements would also be required if human remains are discovered.
- **Contaminated Soil Hazard –** pesticide contaminated soils pose a contact related health risk. This impact is mitigated through removal or sequestration beneath commercial structures or parking lots.

- **Asbestos Cement Hazard –** Asbestos cement pipe was discovered in one portion of the plan area and there is potential for dispersal of asbestos if the pipe and potentially other buried asbestos cement pipes are not properly disposed of. The impact is mitigated through proper disposal of the asbestos cement by certified abatement personnel.
- **Underground Storage Tank Hazard –** An underground storage tank was found in the plan area and poses a risk of upset. The impact is mitigable through removal pursuant to Ventura County Environmental Health Department regulations.
- **Floodplain Modification –** portions of the 100-year floodplain are within the plan area and modifications to Brown Barranca would change the 100-year floodplain boundary. The impact is mitigated through obtaining a letter of map revision (LOMR) from FEMA certifying the changed boundary to ensure that no residences are located within that redefined boundary.
- **Noise –** Proposed receptors along Blackburn Road, Wells Road and Telegraph Road will be exposed to noise that exceeds the allowable exterior level of 65 dBA. This impact is mitigated through building orientation, construction of a sound wall that shields exterior spaces and through construction techniques that will reduce interior noise levels to below the 45 dBA threshold. Onsite interior noise levels would be confirmed as below allowable levels prior to issuance of occupancy permits.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
AESTHETICS		
Impact AES-1 Plan area development would alter the visual character of the plan area, but would not block views of ridgelines to the north of the plan area from SR 126. However, a freeway sound wall proposed in Section 4.8, Noise, would partially block views from the freeway and would potentially create a monolithic structure as viewed from the freeway. Impacts associated with the sound wall would be Class II, significant but mitigable.	**AES-1 Soundwall Aesthetics.** Views of the proposed sound wall abutting SR 126 shall be softened through installation of landscaping such as trees, shrubs and climbing vines, resulting in a variety of textures and colors. Prior to Final Map approval, the Design Review Committee shall review and approve landscaping and irrigation plans. Prior to occupancy of any dwelling unit within the plan area, the sound wall, landscaping and irrigation shall be installed.	Less than significant
Impact AES-2 Development facilitated by the proposed specific plan would alter the visual character of the plan area by replacing existing agricultural land with residential and commercial uses. Although some individuals may view this change as adverse, the change for this area was envisioned in the Ventura General Plan and the proposed development would not create an aesthetically offensive condition. Thus, the impact to the plan area's visual character is considered Class III, less than significant.	None Necessary	Less than significant without mitigation

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
AIR QUALITY		
Impact AQ 1 Project construction would generate temporary air pollutant emissions of ozone precursors ROG and NOx, as well as fugitive dust (PM10). However, implementation of standard dust and emission control conditions would reduce impacts to a less than significant level per the VCAPCD guidelines. Therefore, construction-related air quality impacts would be Class III, less than significant.	None Necessary	Less than significant without mitigation
Impact AQ-2 Operational emissions of ROG and NOx would exceed VCAPCD thresholds. However, these impacts are mitigable with payment of Transportation Demand Management (TDM) fees. Therefore, the project would have a Class II, significant but mitigable, impact to regional air quality.	**AQ-2 (a) Energy Efficiency.** The residential and commercial structures proposed for development under the Parklands Specific Plan shall be designed to increase energy efficiency 20% beyond Title 24 requirements to partially offset the operational emissions associated with daily operation of the proposed project following buildout. Proposed energy conservation measures shall be specified in individual building plans and shall be subject to review and approval by the Inspection Services Division. **AQ-2(b) Air Quality Mitigation Fund.** The applicant shall contribute toward an air Quality Mitigation fund to be used to develop regional programs to offset air pollutant emissions associated with implementation of the Parklands Specific Plan. The total amount that would be contributed to this fund shall be calculated based upon the methodology described in Ordinance 93-37. Fees may be adjusted by the City over time if development totals or emission or cost factors change. The fund shall be used to finance City programs to reduce regional air pollutant emissions. Specific mitigation measures that could be undertaken using the fund include, but are not limited to, enhanced public transit service, vanpool programs/subsidies, rideshare assistance programs, clean fuel programs, improved pedestrian and bicycle facilities, and park-and-ride facilities.	
Impact AQ-3 Development under the specific plan would not result in LOS E or F at any study area intersections after mitigation. Therefore, impacts relating to CO hotspots would be Class III, less than significant.	None Necessary	Less than significant without mitigation
Impact AQ-4 The proposed project would not generate population growth beyond AQMP forecasts. Impacts relating to AQMP consistency would	None Necessary	Less than significant without mitigation

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
therefore be Class III, less than significant.		
BIOLOGICAL RESOURCES		
Impact BIO-1 Development under the Parklands Specific Plan could have temporary adverse effects on special status species, if present, during and after construction due to vegetation removal, culverting of a portion of the barranca and the amount of time necessary for replacement vegetation to mature. This is a Class II, significant but mitigable impact.	**BIO-1(a) Pre-Construction Surveys.** A qualified biologist shall conduct pre-construction field surveys for arroyo chub, southwestern pond turtle, two-striped garter snake, San Diego mountain kingsnake, and California red legged frog. If observed, these species shall be relocated to suitable habitat areas up- or downstream of the project area. **BIO-1(b) Construction Timing.** Work within 500 feet of Brown Barranca shall be planned to avoid the breeding bird season if feasible, which generally runs from March 1 to August 31, as early as February 1, for raptors. If avoidance of the breeding bird season is infeasible, BIO-1(c) shall be implemented. **BIO-1(c) Nesting Bird Surveys.** If avoidance of the breeding bird season is not feasible, beginning 30 days prior to the disturbance of suitable nesting habitat, the project proponent should arrange for weekly bird surveys to detect protected native birds occurring in the habitat that is to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted with emphasis on Cooper's hawk, yellow warbler, yellow-breasted chat, Allen's hummingbird, California horned lark and other riparian-dependent special-status bird species. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If a protected native bird is found, the project proponent shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	(within 500 feet of raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and the juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel should be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.	
Impact BIO-2 Development facilitated by the specific plan would require the disturbance of 1.63 acres of riparian/wetland habitat. However, revegetation of riparian/wetland habitat that would result in no "net loss" of habitat. Impacts are Class II, significant but mitigable.	**BIO-2(a) Invasive Plant Removal.** The applicant shall remove invasive or non-native plants from the Brown Barranca Preserve area, including (but not limited to) castor bean, German ivy, garden blackberry, free tobacco, garden nasturtium, and palm trees. **BIO-2(b) Wetland Creation.** The applicant shall mitigate the removal of riparian vegetation (CDFG defined wetlands) at a minimum ratio of 1:1. The mitigation may be done on-site by increasing the area of the Brown Barranca preserve where feasible to eliminate landscape specimens and incorporate native riparian species between the bikepath/footpath and the preserve such that the total area of the preserve is increased by 0.27 acres or the applicant may mitigate off-site through in-kind mitigation banks within the same watershed subject to review and approval by the Planning Division or their designee. **BIO-2(c) Barranca and Basin Maintenance Plan.** The applicant shall develop and implement a maintenance plan to assure that future maintenance of the detention basin, Brown Barranca and associated slopes for permanent erosion control measures, which will minimize adverse effects to vegetation and promote maturation of wetland vegetation such that a Corps defined wetland, is formed.	Less than significant
Impact BIO-3 Development of the plan area would place development in close proximity to sensitive biological resources. Development would introduce noise, lighting, domestic animals, and introduce potential erosion and sedimentation effects. This could potentially reduce the habitat quality for	**BIO-3(a) Proper Erosion Control Device Installation.** The applicant shall install erosion control devices in areas that have the potential to drain to Brown Barranca throughout the construction duration and prior to vegetation establishment. These devices should include silt fencing, sandbags, straw wattles, and/or straw bales.	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
sensitive vegetation and wildlife species and would be a Class II, significant but mitigable, impact.	**BIO-3(b) Split-Rail Fencing.** The applicant shall install aesthetic (split-rail) fencing between the proposed footpath and Brown Barranca to reduce disturbance of habitat. **BIO-3(c) Biological Resource Signage.** The applicant shall provide signage and written materials to all property owners describing biological resources and prohibiting entry into the Brown Barranca Preserve. **BIO-3(d) Oil/Grease Traps.** The applicant shall fit inlets of all storm drains with easily accessible trash excluders approved for use by the City and the Regional Water Quality Control Board. Low Impact Development (LID) principles established in the City's Municipal (MS4) Stormwater Permit shall be used to manage street runoff to meet stormwater quality objectives. Other than litter exclusion, stormwater quality objectives shall not be accomplished in the storm drain inlets. Rather, the objectives shall be accomplished through LID practices.	
CULTURAL RESOURCES		
Impact CR-1 The proposed project would not disturb any recorded cultural resources. However, site development has the potential to disturb as yet undetected cultural resources. This is a Class II, significant but mitigable, impact.	**CR-1(a) Temporary Work Suspension if Resources Unearthed.** In the event that archaeological or paleontological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist or paleontologist as appropriate has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation work associated with Native American cultural material. **CR-1(b) Human Remains Procedures.** If human remains are unearthed, State Health and Safety Code Section 7070.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC).	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
HAZARDS and HAZARDOUS MATERIALS		
Impact HAZ-1 Soils within the plan area have been utilized for agricultural operations, contaminants pose potential health hazards to humans and the risk of upset. Impacts associated with development of the plan area would be Class II, significant but mitigable.	**HAZ-1 Contaminated Soil.** Two areas of soil contamination necessitate either onsite sequestration, or offsite disposal or some combination of both as described below. These include soils in the following locations. 1) The upper ½ foot of soil in the northwest quadrant of the plan area (see Figure 4.5-1) due to contamination with TDE, including the upper ½ foot of soils in the western part of the NW storage location (see Figure 4.5-1). 2) The upper ½ foot of soils within a 10-foot radius of SS-220 (see Figure 4.5-2) due to contamination with TDE. Onsite Sequestration. The upper ½ foot of soil (or as recommended by the Ventura County Environmental Health Division) shall be removed from both locations, and shall be sequestered on-site in a manner approved by the Ventura County Environmental Health Division. Sequestration necessitates isolation from human and wildlife contact and would require that the soil be buried onsite at depths unlikely to be disrupted, or would require capping by pavement or asphalt. Areas suitable for capping might include beneath the parking garages, or beneath roadways. Onsite sequestration shall be conducted as directed by Ventura County Environmental Health. Offsite Disposal. The upper ½ foot of soil shall be removed from both areas and shall be transported off site and disposed of as hazardous waste at an approved facility in accordance with applicable rules and regulations.	Less than significant
Impact HAZ-2 Development facilitated by the proposed specific plan would require the removal of materials containing asbestos. Demolition or removal of these items could result in dispersal of this contaminant. This is a Class II, significant but mitigable, impact.	**HAZ-2. Asbestos Cement.** Prior to any demolition or renovation, the identified asbestos cement piping located in the southern field area in a pile of agricultural debris (see Figure 4.5-1) and any other AC piping discovered during construction shall have the asbestos containing material removed according to proper abatement procedures recommended by the asbestos consultant and as required by the VCAPCD. All abatement activities shall be in compliance with California and Federal OSHA, and with the VCAPCD requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	abatement. All asbestos containing material removed from onsite shall be transported by a licensed to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest.	
Impact HAZ-3 An underground storage tank (UST) was found on the plan area. These would require removal pursuant to Ventura County Environmental Health Department regulations. Impacts associated with this UST would be Class II, significant but mitigable.	**HAZ-3 Underground Storage Tank.** The underground storage tank (see OB-3 on Figure 4.5-2) shall be properly excavated and disposed of according to the guidelines of the Ventura County Fire Department and the Ventura County Environmental Health Division. These guidelines require the following: 1) Preparation of an application for permanent closure available for download at http://www.ventura.org/rma/envhealth/programs/cupa/hzustpgm.htm 2) Excavation oversight by a Ventura County Environmental Health Division Inspector 3) A permanent closure report submitted to the Ventura County Certified Unified Program Agency (CUPA) with copies of all receipts, manifests, transport documents, sample results, chain of custody, plot plans, and unauthorized release form (if necessary). 4) Soil samples must be collected in approved containers for analysis pursuant to Environmental Protection Agency Method 5035 for hydrocarbon samples. Los Angeles Regional Water Quality Control Board	Less than significant
DRAINAGE AND FLOOD HAZARDS		
Impact HYD 1 Development under the Parklands Specific Plan would increase storm water flow from the plan area due to increased impervious surfaces. However, the project includes Low Impact Development (LID) stormwater treatment designs and a detention basin sized to ensure that post development flow rates to Brown Barranca do not exceed pre-development flow rates. The project would result in increased downstream velocities within an existing concrete channel; however, the velocity increases are confined to a concrete channel. Therefore, the impact relating to increased stormwater flows and channel velocities within Brown Barranca would be Class III, less than significant.	None Necessary	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
Impact HYD-2 Portions of the plan area are located within the 100- year flood plain. The specific plan includes improvements that would alleviate existing flooding within the plan area and would change the boundaries of the existing flood plain. This is a Class II, significant but mitigable, impact.	**HYD-1 Letter of Map Revision.** Prior to issuance of building permits, a Letter of Map Revision (LOMR) from FEMA shall be obtained and the final development shall be sited to assure that no structures are placed within the redefined 100-year Flood Zone.	Less than significant
LAND USE and PLANNING		
Impact LU-1 The proposed Parklands Specific Plan implements policies and actions of the 2005 General Plan and provides development standards specific to the plan area that will supersede portions of the zoning ordinance. The Parklands Specific Plan would become the primary guidance document and would not conflict with other regulatory planning documents. This is a Class III, less than significant impact with respect to policy consistency.	None Necessary	Less than significant
Impact LU-2 The proposed Parklands Specific Plan would require a boundary reorganization with annexation of three parcels from the County to the City. Provided that the boundary reorganization/annexation is approved subsequent approvals could move forward. This is a Class III, less than significant impact with respect to land use policy conflicts.	None Necessary	Less than significant
Impact LU-3 The proposed Parklands Specific Plan was evaluated for consistency with applicable SCAG policies and could be considered consistent. Existing mitigation measures as summarized in Table ES-1 would reduce environmental impacts to a level that is less than significant. The proposed specific plan has a Class III, less than significant impact due to policy consistency.	None Necessary	Less than significant
NOISE		
Impact N-1 Construction activity associated with development of the specific plan would temporarily generate noise within and adjacent to the plan area. However, given that construction activity would be limited to between the hours of 7:00 AM and 8:00 PM, no violation of the City's Noise Ordinance is anticipated. Therefore, construction impacts are considered Class III, less	None Necessary	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
than significant.		
Impact N-2 Traffic generated by plan area development would increase noise levels along roadways in the vicinity of the project site. However, project-related traffic noise impacts along these roadways would be Class III, less than significant.	None Necessary	Less than significant
Impact N-3 Both existing onsite noise levels and projected noise levels opposite SR 126 within the plan area exceed the City's "normally acceptable" community noise exposure standards. Since development facilitated by the proposed specific plan would place residential uses in an area where noise levels exceed the City's "normally acceptable" community noise exposure standards, impacts would be Class II, significant but mitigable.	**N-3(a) Sound Wall.** Prior to grading permit issuance, the applicant shall incorporate a sound wall along the southeastern boundary of the plan area as indicated on Figure 4.8-2 (Figure 3 of the Barrier Analysis, Rincon Consultants, 2008), or some combination of walls as also indicated on Figures 1 and 2 of the Barrier Analysis (see Appendix G). Construction material, height, and location shall be sufficient, at a minimum, to intercept the freight truck line of sight on SR 126. Adequate wall height and placement shall be determined by the Planning Manager in consideration of the following parameters: (1) CMU wall height, material, and location consistent with Caltrans sound walls within the City; (2) proposed building pad elevations in relation to SR 126; and (3) vertical distance between CMU wall height and lowest roof eave and window. **N-3(b) Lot 132**. The residence and garage at this location shall be linked with a solid block wall and oriented, such that the exterior usable space is buffered from noise generated along Wells Road. **N-3(c) Interior Noise Attenuation.** Plans submitted to the Inspection Services Division for purposes of obtaining building permits shall illustrate that residences fronting Telegraph Road, Wells Road, and Blackburn Road/SR 126 shall ultimately be constructed to include the following: a) Windows facing the street shall be dual pane, laminated with a Sound Transmission Class (STC) rating of at least 40; b) Windows facing the street on multiple-family structures shall be minimized and non-opening. c) Exterior walls facing the street shall be constructed of staggered wood studs, or equipped with a resilient channel between the studs and wallboard, or any other wall system with an STC rating of at least 50;	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	d) Exterior doors facing the street shall be of a sound insulating design with a STC rating of at least 38; and e) All exterior doors and windows shall be installed with proper weather stripping. f) Roof construction of concrete tile with 15/32-inch plywood, R-30 batt insulation in the attic, and a layer of ½-inch thick gypsum board separating the attic from living areas; g) Northernmost homes shall not have courtyard access doors facing Telegraph Road.	
TRAFFIC and CIRCULATION		
Impact T-1 Development facilitated by the proposed specific plan would increase traffic levels on the local circulation system. However, all studied intersections would operate at LOS C or better. Therefore, impacts are Class III, less than significant.	None Necessary	Less than significant
Impact T-2 Under project plus future year (2025) conditions, impacts would not cause levels of service to decline below acceptable levels at any of the study area intersections. Impacts would be Class III, less than significant.	None Necessary	Less than significant
Impact T-3 The proposed specific plan will create new intersections and result in development of new roadways. No specific thresholds would be exceeded; however, recommendations to improve access are included. This is a Class III, less than significant impact.	None Necessary because significant hazards would not occur; however, the following recommendations were made to improve circulation. • It is recommended that the full access driveway proposed on Wells Road approximately 500 feet south of Telegraph Road be modified to accommodate turning and parking movements. These modifications should include provision of additional throat length and reconfiguration of the parking area directly west of the driveway connection to Wells Road. • It is recommended that frontage improvements at the Wells Road/Carlos Street intersection include modification of the existing raised median on Wells Road to accommodate a northbound left-turn bay, which should contain 100 feet of vehicle storage and a 60 foot taper. • It is recommended that the eastbound approach (project parkway) of the Wells Road/Citrus Drive intersection retain its current lane geometry (a shared left-turn/through and a right-turn lane), which	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	would provide better operations and reduce queue lengths compared to the proposed one-lane approach. This would require that the median on the parkway be modified to provide sufficient width for two lanes on the eastbound approach, or that the approach be widened. • It is recommended that the median on Wells Road south of the Wells Road/Citrus Drive intersection be reconstructed to provide a minimum of 160 feet of storage in the northbound left-turn bay to avoid vehicles blocking through traffic on Wells Road. • It is recommended that the two-lane divided parkway in the plan area be designed to accommodate a California Design Vehicle (WB 40 semi-truck). The secondary roadways should be designed to accommodate trash trucks and emergency vehicles.	
Impact T-4 Three of the study area intersections are contained in the County's Congestion Management Plan (CMP). Added project traffic would result in intersection levels of service to operate at LOS C or better. Therefore, impacts are Class III, less than significant.	None Necessary	Less than significant
Impact T-5 The proposed specific plan would result in additional traffic on SR 126 in the vicinity of the plan area. However, project generated and cumulative traffic increases would not result in a level of service below C, and mainline freeway operations would continue to operate smoothly. This is a Class III, less than significant impact.	None Necessary	Less than significant
Impact T-6 The project would introduce reduced parking requirements for the specific plan in certain cases. Provided that the specific plan is approved, parking supply would be developed according to the Development Code and adverse effects relating to parking supply would be Class III, less than significant.	None Necessary	Less than significant

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1.0 INTRODUCTION

This document is a Final Environmental Impact Report (EIR) that evaluates the proposed Parklands Specific Plan located in the City of Ventura, California. The proposed project was previously evaluated in a draft Mitigated Negative Declaration (MND) that was circulated for public review from March 18, 2008 through April 16, 2008. Based on comments received on the draft MND, the City determined that additional environmental analysis was warranted and decided to prepare a focused EIR for the project . The mitigated negative declaration and comments on the mitigated negative declaration are contained in Appendix A.

This section describes: (1) the purpose and legal authority of the EIR; (2) the scope and content of the EIR; (3) lead, responsible, and trustee agencies; and (4) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 PURPOSE AND LEGAL AUTHORITY

The proposed project requires the discretionary approval of the City of Ventura. Therefore, it is subject to the requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines,* the purpose of this EIR is to serve as an informational document that:

> *...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

This EIR has been prepared as a Project EIR pursuant to Section 15161 of the *CEQA Guidelines.* A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines:*

> *This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.*

The EIR is to serve as an informational document for the public and City of Ventura decision-makers. The process will culminate with Planning Commission and City Council hearings to consider certification of a Final EIR and approval of the project. In accordance with Section 15152 of the CEQA Guidelines, this EIR tiers off of the 2005 General Plan Final EIR that was originally certified by the City of Ventura in August 2005 and for which an EIR Supplement was approved in July 2007. The 2005 General Plan EIR is incorporated by reference.

1.2 EIR SCOPE AND CONTENT

In accordance with the CEQA *Guidelines*, an Initial Study was prepared for the project and a Notice of Preparation (NOP) was distributed to affected agencies and the public for the required 30-day period on July 1, 2008. Thirteen letters were received in response to the notice of preparation. Table 1-1 summarizes the issues relevant to the EIR that were identified in the NOP comments received and where the issues raised are addressed. The NOP, Initial Study, and NOP comment letters received are included in Appendix A.

Table 1-1
NOP Comment Issues

Issue	EIR Section
Loss of Agricultural Resources	Aesthetics
Climate Change Analysis	Air Quality
Construction Emissions including TACs	Air Quality, Hazards and Hazardous Materials
CO Screening	Air Quality
Impacts to unknown cultural resources and screening methods	Cultural Resources
Increased runoff	Hydrology/Water Quality
Flood protection	Hydrology/Water Quality
Annexation and Zone Change	Land Use
Local and regional traffic and transportation impacts; sidewalks; TIMF	Transportation and Circulation
Increase of traffic at railroad crossing	Transportation and Circulation
Water supply and groundwater	Initial Study
Agricultural resources	Initial Study

The City held a scoping meeting on October 28, 2008 in order to solicit comments from the public on the proposed project. Two individuals attended and provided comments. Comments were received in the form of written and verbal transmission. Table 1-2 summarizes these comments as recorded by staff present and provides notes on comments. It should be noted that some comments were combined due to topic similarity.

Table 1-2
Summary of Scoping Meeting Comments

Comment Topic	Notes
Architectural and Cultural Resources	Impacts are discussed in the Initial Study (Appendix A) and were found to be less than significant based on a Phase I Archaeological Study. Only those cultural resources on or within the project vicinity are analyzed.
Density	Land use densities for the project are based on the project as a whole rather than portions of the site. Potentially significant impacts related to land use are discussed in Section 4.7, *Land Use*.
Flooding	Drainage and flooding impacts are discussed in the Hydraulic Study (Appendix E) and in the DEIR in Section 4.6, Drainage and Flood Hazards.
Hazards	Phase I and II Site Assessments were completed for the project. Accordingly, the assessment did not recognize the identified hazards noted in the comment as a significant hazard to the project site or surrounding areas. Potentially significant impacts are discussed in

Table 1-2
Summary of Scoping Meeting Comments

	Section 4.5, *Hazards*, and are summarized in Appendix F.
Walkability	The "walkability" of a project is not an environmental issue under CEQA. This issue relates to the design of th project.
Public Safety – Emergency Services • Increased response times • Swales	Streets adjacent to the plan area would not be narrowed, but may not widened. Projects must undergo Fire Department plan reviews prior to final approval to ensure that site access is adequate. The Ventura Police Department has not indicated the potential for inadequate response times. The Initial Study determined emergency service impacts to be less than significant (Appendix A).
Schools and economic impact	The applicant is required to pay school impact fees. The addition of new students to the area schools is analyzed in the Initial Study (Appendix A) and impacts were found to be less than significant.
Aesthetics	Potentially significant visual impacts, both project-specific and cumulative, are discussed in Section 4.1, *Aesthetics*. The analysis includes impacts upon the adjacent view corridor and from sound walls.
Water Supply	The project includes a Water Supply Assessment (Appendix I). The WSA includes analysis based on the ability of the water provider to supply water to the proposed project under multiple scenarios including multi-year drought conditions. Based on the WSA, impacts were determined to be less than significant.
Economic Impacts	Economic impacts are not an environmental impact that can be classified as significant by CEQA (Section 15064). Infrastructure costs to implement the project are paid for by the applicant/developer.
Traffic • Railroad Intersection • SR-118 Intersection • SOAR expiration • Cumulative Growth • Eastbound SR-126 traffic	A Traffic Study was completed for the specific plan that included an analysis of both project generated and cumulative impacts in Appendix H. The traffic analysis studies those intersections that are likely to result in significant impacts as a result of project generated traffic. Other intersections not included in the analysis were determined not to have in significant impacts. Consideration of impacts that may occur once SOAR expires would be speculative. Potentially significant impacts are discussed in Section 4.9, *Traffic*.

This EIR addresses the issues determined to be potentially significant by the Initial Study previously prepared for the project as well as the responses to the NOP and scoping meeting comments. Issues that are addressed in the EIR include:

- *Aesthetics*
- *Air Quality*
- *Biological Resources*
- *Cultural Resources*
- *Land Use and Planning*
- *Traffic/Circulation*
- *Noise*
- *Hazards and Hazardous Materials*
- *Hydrology and Water Quality*

The EIR addresses the issues referenced above and identifies potentially significant environmental impacts, including both project-specific and cumulative impacts. In addition, the EIR recommends feasible mitigation measures that would reduce impacts to a level of insignificance or eliminate adverse environmental effects.

The impact analyses contained in Section 4.0 of the EIR includes a description of the physical and regulatory setting within each issue area, followed by an analysis of the project's impacts. Each specific impact is numbered, followed by an explanation of how the level of impact was determined. When appropriate, feasible mitigation measures that address significant impacts are included following the impact discussion. Measures are numbered to correspond to the impact that they mitigate. Finally, following the mitigation measures is a discussion of the residual impact that remains following implementation of recommended measures.

The *Alternatives* section of the EIR (Section 6.0) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the project's basic objectives. Alternatives evaluated include the CEQA-required "No Project" scenario and two alternative development scenarios for the site. The EIR also identifies the "environmentally superior" alternative among the options studied.

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

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

1.3 LEAD, RESPONSIBLE AND TRUSTEE AGENCIES

The *CEQA Guidelines* require the identification of "lead," "responsible," and "trustee" agencies. The City of Ventura is the "lead agency" for the project because it has the principal responsibility for approving the project.

A "responsible agency" is a public agency other than the "lead agency" that has discretionary approval authority over the project (the *CEQA Guidelines* define a public agency as a state or local agency and specifically exclude federal agencies from the definition). The Ventura County Watershed Protection District (VCWPD) is a responsible agency, as the VCWPD has permit authority for connections to the natural and concrete-lined barrancas such as Brown Barranca onsite. The VCWPD will need to approve modifications to Brown Barranca. The California Department of Transportation (Caltrans) is also a responsible agency, as permits may be required from Caltrans for work within the SR 118 and SR 126 rights-of-way. The Local Agency

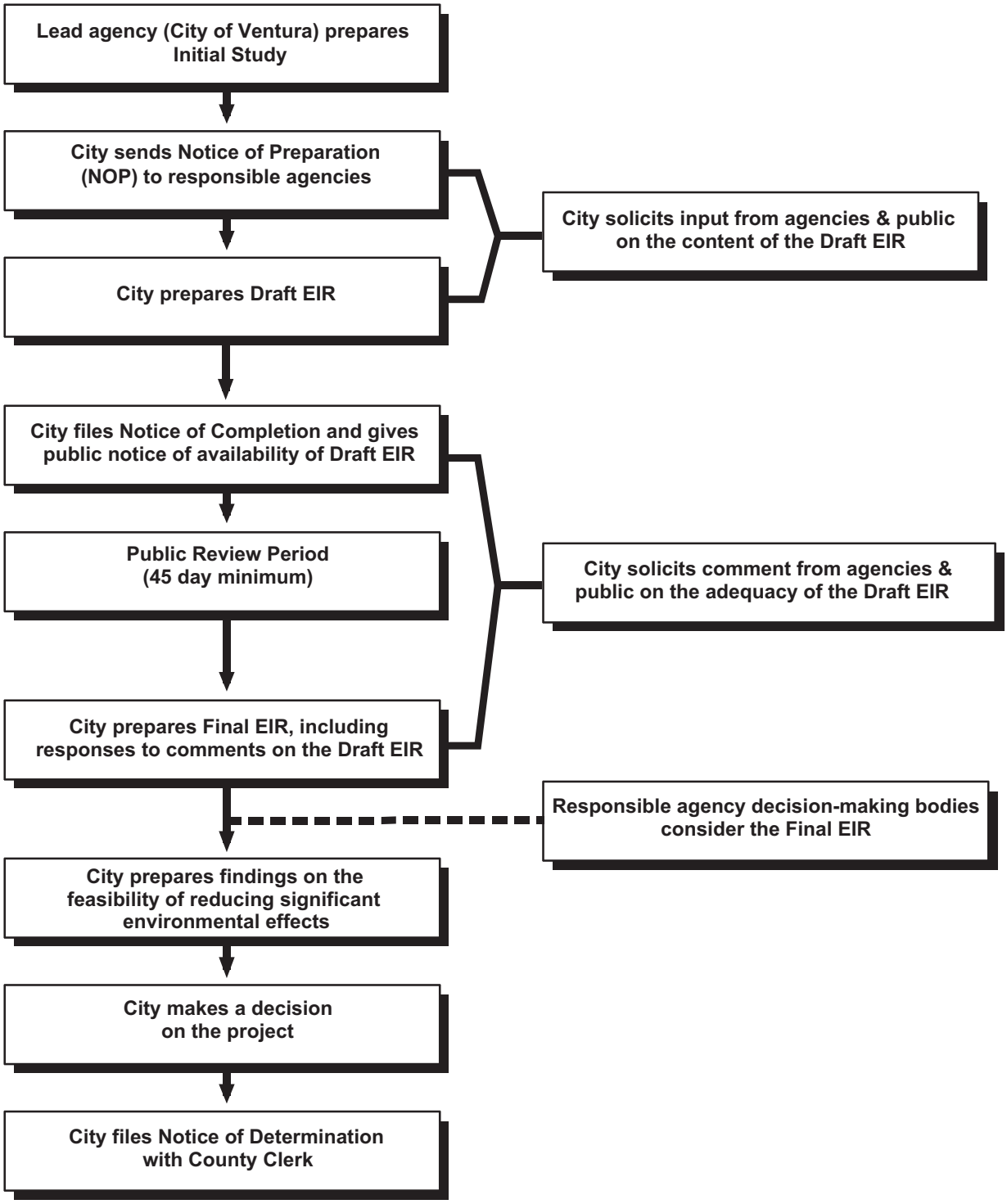
Formation Commission (LAFCo) is a responsible agency because the LAFCo has the authority to approve annexation of portions of the plan area to the City of Ventura.

A "trustee agency" refers to a state agency having jurisdiction by law over natural resources affected by a project. The California Department of Fish and Game (CDFG) is a trustee agency for the project and has authority over wetland and riparian resources within the plan area. The CDFG will be responsible for issuing a streambed alteration agreement for the project. The RWQCB could be considered a responsible agency with respect to water resources at the site including both groundwater resources and surface water resources in Brown Barranca. The RWQCB will be responsible for granting a 401 Water Quality Certification for the project.

1.4 ENVIRONMENTAL REVIEW PROCESS

The environmental review process, as required under CEQA, is presented below and illustrated generally on Figure 1-1.

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP is typically accompanied by an Initial Study that identifies the issue areas for which the proposed project could create significant environmental impacts. Typically, the lead agency holds a scoping meeting during the 30-day NOP review period.
2. **Draft Program EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (i.e., direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** A lead agency must file a Notice of Completion with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the Notice in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the Notice to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit comments from the public and respond in writing to all written comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless a shorter period is approved by the Clearinghouse (Public Resources Code Section 21091).



CEQA Environmental Review Process

Figure 1-1

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) a list of persons and entities commenting; and d) responses to comments.

5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).

6. **Lead Agency Project Decision.** A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).

7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible *(CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant adverse environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

8. **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

9. **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA legal challenges [Public Resources Code Section 21167(c)].

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2.0 PROJECT DESCRIPTION

The proposed project involves a specific plan (Parklands Specific Plan, Specific Plan No. 6) for the development of a 66.7-acre, eight-parcel area in the City of Ventura. This section describes the project location, characteristics of the site and the proposed development, project objectives, and the approvals needed to implement the project.

2.1 PROJECT APPLICANT

Westwood Communities Corporation
1263 Westwood Boulevard, Suite 210
Los Angeles, CA 90024

2.2 PROJECT LOCATION

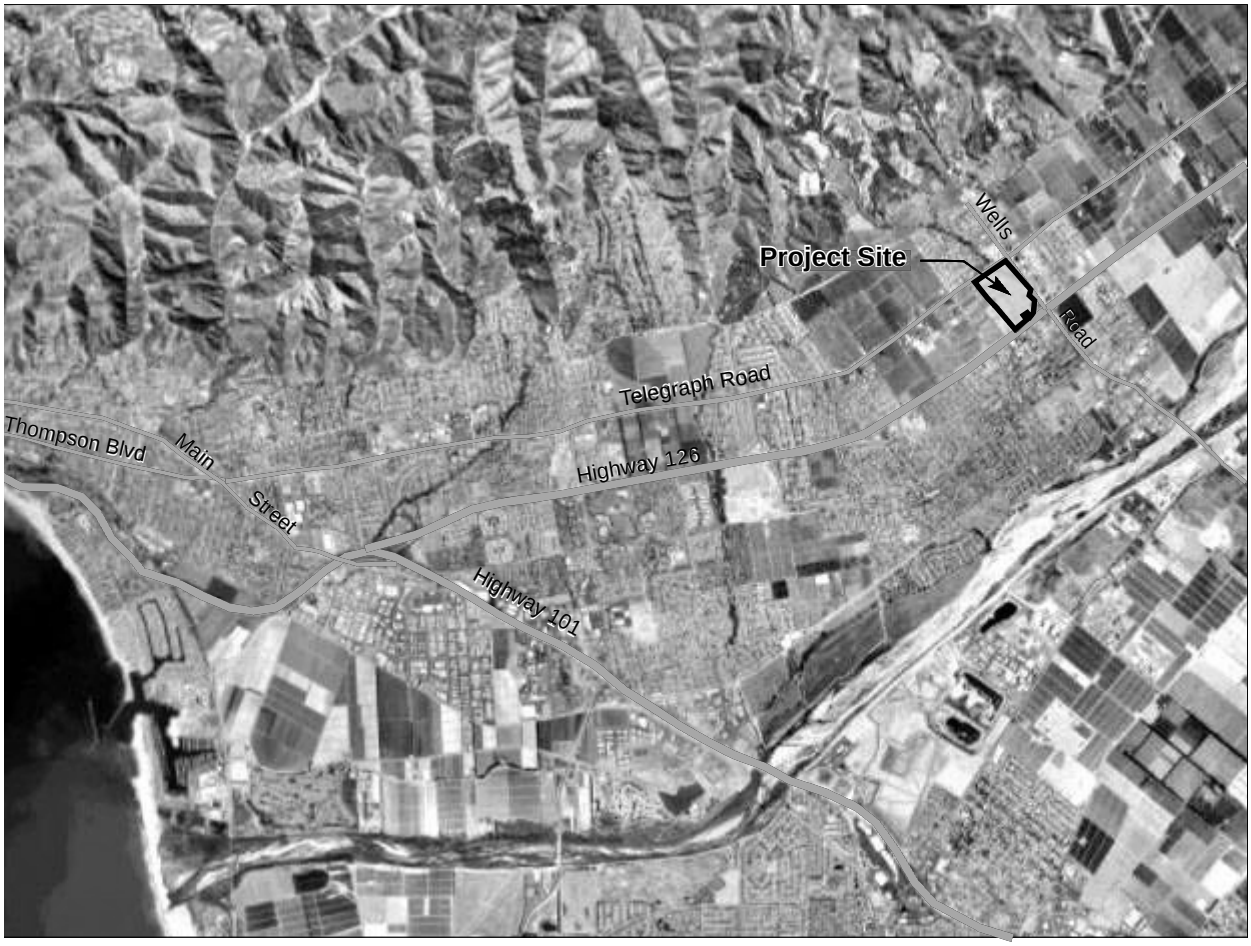
The 66.7-acre plan area is located in Ventura, California. The plan area is located southwest of the intersection of Telephone Road and Wells Road. It is bounded by Telephone Road on the north, Wells Road on the east, and by Blackburn Road and Highway 126 on the south. The western boundary is flanked by single-family homes and a mobile home park. Site Assessor Parcel Numbers and associated acreage are listed in Table 2-1.

Table 2-1
Plan Area Parcels

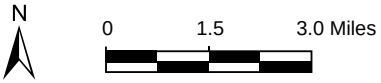
Parcel Number	Acres
089-0-012-004	0.41
089-0-012-008	0.13
089-0-012-014	21.11
089-0-012-016	6.83
089-0-012-018	26.42
089-0-012-019	2.45
089-0-012-020	5.20
089-0-012-021	3.10
Total	**65.65**

There is a minor discrepancy between the acreage indicated in the Assessor's Parcel maps and that indicated on the plans. The discrepancy results from differences in survey methodology, with the plan acreage assessed at 1.05 acres greater than that recorded on the Assessor's maps.

The plan area's location within the region and general site vicinity are illustrated in Figures 2-1 and 2-2, respectively. Regional access to the site is provided by the Santa Paula Freeway (SR 126).

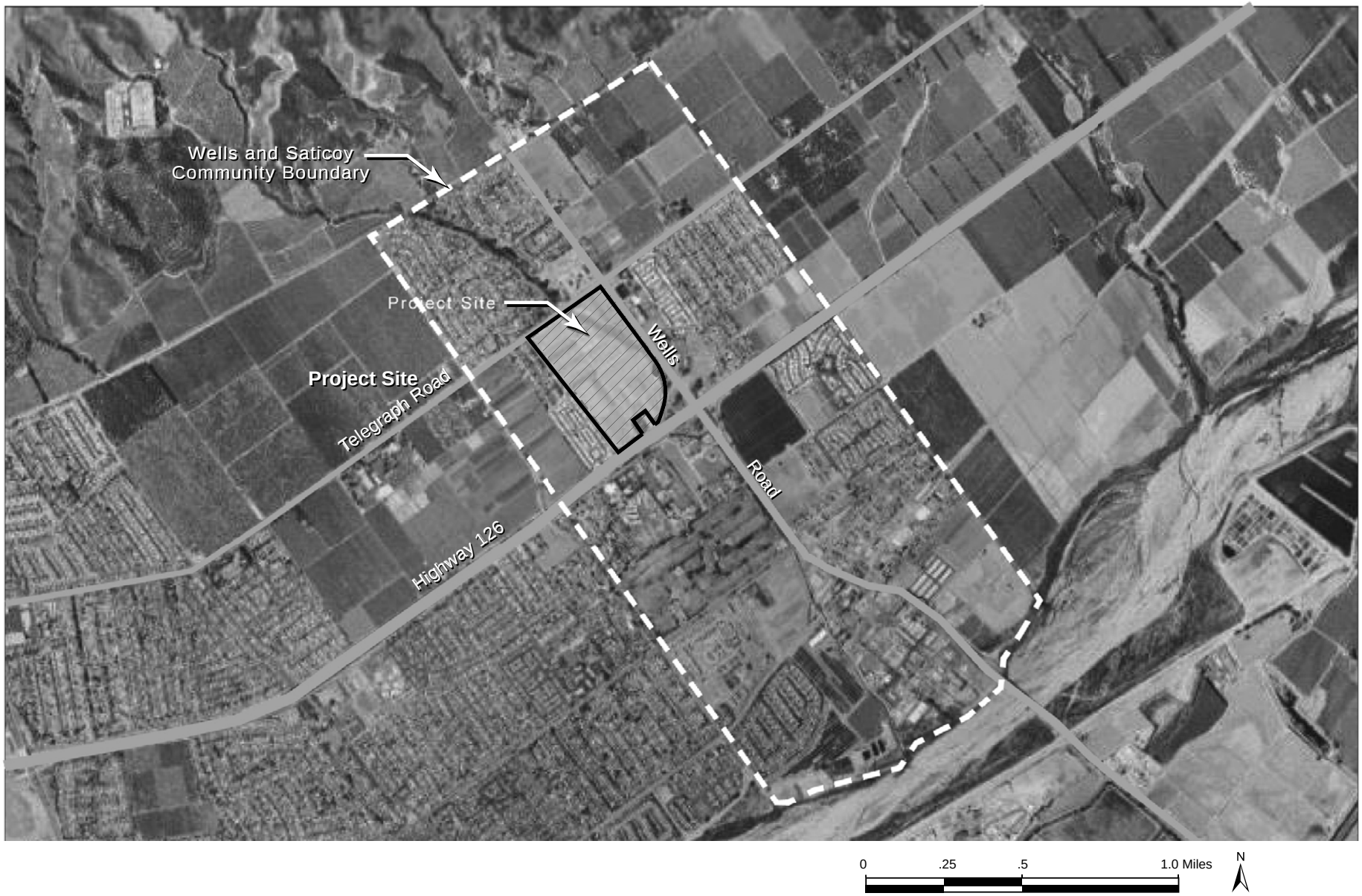


Source: Moule & Polyzoides, May 2006



Project Vicinity

Figure 2-1



Source: Moule & Polyzoides, May 2006

Project Location

Figure 2-2

2.3 CURRENT LAND USE AND REGULATORY SETTING

The plan area is currently utilized for agricultural row crop production. A supporting caretaker mobile home is located adjacent Telegraph Road near the center of the plan area.
Table 2-2 below summarizes the existing characteristics of the project site.

Table 2-2
Existing Site Characteristics

Site Size	66.7 acres
General Plan Land Use Designation	Neighborhood Low (0-8 du/acre) – 13 acres within the City Agricultural Urban Reserve -40 Acre Minimum – 54 acres within the County
Zoning Designations	R-1-7 (Single-Family Residential) (APN's City Limits) AE-40 (Agricultural Exclusive- 40 Acre Minimum) (APN's County Limits)
Current Use and Development	Agricultural row crop production. Supporting caretaker mobile home located adjacent Telegraph Road near the center of the plan area.
Surrounding Land Use/ Zoning Designations	North: Residential assisted living retirement community and single-family residential. South: Blackburn Road and SR 126, with a single-family residence located adjacent the northern boundary of Blackburn Road. East: Commercial retail, educational, medical office, and a detention basin. West: Single-family residential and a mobile home park.
Regional Access Local Access	State Route 126 Telegraph Road, Wells Road, Blackburn Road, and Saticoy Avenue.
Public Services	Water: City of Ventura Sewer: City of Ventura Fire: Ventura Fire Department Police: Ventura Police Department

2.3.1 Current Plan Area Land Use

The 66.7-acre plan area is currently used for row crop agricultural production along with a caretaker's mobile home. Crop production on the site is primarily flowers. Brown Barranca crosses through the northeastern portion of the plan area.

2.3.2 Surrounding Land Uses

A single-family home community and a mobile home community are located adjacent the western boundary of the plan area. On the southern plan area boundary, an existing single-

family home is located on the north side of Blackburn Road. To the east, commercial retail, educational facilities, a medical office building, and a private water reservoir are located across Wells Road. To the north of the plan area across Telegraph Road is a neighborhood of single-family detached houses, a medical office building and an assisted-living retirement community.

2.3.3 Land Use Regulatory Overview

Assessor Parcel Numbers (APNs) 089-0-012-020, 089-0-012-019, 089-0-012-021, 089-0-012-004, and 089-0-012-008 (totaling about 11 acres) are located within the City of Ventura and are zoned Single-Family Residential (R-1-7). The remaining APNs, 089-0-012-014, 089-0-012-016 and 089-0-012-018, (totaling about 54 acres) are currently within unincorporated Ventura County and have a County zoning classification of AE -40 (Agriculture Exclusive -40 Acres).

2.4 PROJECT CHARACTERISTICS

The proposed project involves the adoption of the Parklands Specific Plan (Specific Plan No. 6) to guide future development within the plan area. Development under the Parklands Specific Plan would include predominantly residential uses, with supporting infrastructure, green-space, community recreational space, and a small amount of service commercial development. The Specific Plan directs all facets of future development within the 66.7-acre plan area, including:

- *Designation of land uses*
- *Designation of required access and circulation elements*
- *Location and sizing of infrastructure*
- *Phasing of development*
- *Financing methods for on and offsite public improvements*
- *Establishing aesthetic and functional or operational design guidelines and standards of development, including maintenance, repair and replacement of infrastructure*

2.4.1 Specific Plan Development Potential

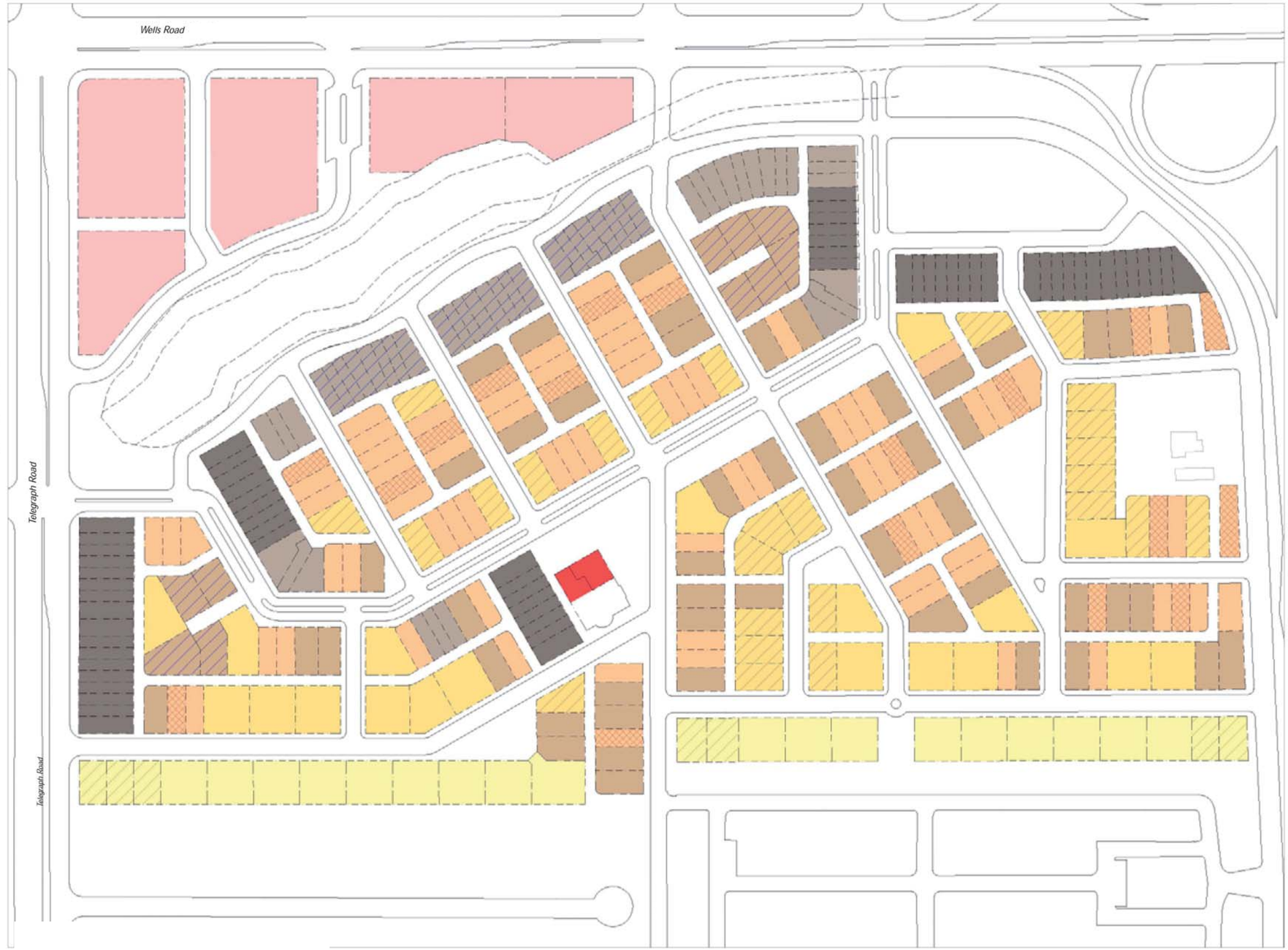
Figure 2-3 provides an overview of the proposed Regulating Plan and Figure 2-4 shows the conceptual configuration of the building lots. Proposed residential land uses include 173 condo or live-work units, 110 Duplex/Triplex/Quadplex units (also condominiums), and 216 Single-Family Homes, totaling 499 residential units on 33.49 developable acres. Live-work units are integrated housing and working space units with retail or commercial space on the first floor and residential above. The overall amount of condominium housing or live-work space would not exceed the equivalent of 150 multi-family residences if commercial space were to take the place of residences. Other proposed land uses include 6,560 square feet of civic space as a community center, 25,000 square feet of commercial/retail space, and approximately 5.84 acres of active recreational parks. The park spaces including a linear park/bikepath along Brown Barranca, 1.82 acres of passive recreational parks, and 3.96 acres of sensitive habitat reserves. Greenspace (parks and the Barranca Preserve) within the plan area totals 11.62 acres.

Regulating Plan

Source: Moule & Polyzoides, March 2008.

Figure 2-3

Unit Count by Building Type	Quantity	Unit Size
Courtyard Housing and Live/Work	173 units	850-1,300
22′ x 92′ Rowhouse	62 units	1,350-2,050
22′ x 92′ Triplex	24 units	1,350-2,050
22′ x 92′ Quadplex	24 units	1,350-2,050
35′ x 92′ SFH 2-story	68 units	1,600-2,450
35′ x 92′ SFH 1.5-story + Bonus Room	18 units	1,800-2,450
45′ x 92′ SFH 2-story	50 units	2,000-3,050
59′ x 75′ Bungalow Court	10 units	2,800-3,200
52′ x 84′ SFH 2-story	26 units	2,800-3,250
89′ x 84′ SFH 2-story	19 units	3,000-3,600
52′ x 84′ SFH 1.5-story	7 units	2,800-3,250
89′ x 84′ SFH 1.5-story	18 units	3,000-3,600
TOTAL	**499 units**	
Community Building		



Proposed Lot Distribution

Figure 2-4

Source: Katie O'Reilly Rogers, Inc., April, 2007.

Table 2-3 lists and quantifies the specific plan components in detail, referencing the color-coded planning areas shown on the Regulating Plan (Figure 2-3).

Table 2-3
Specific Plan Buildout Summary

Planning Area	Land Use	Gross Acreage	Amount
Corridor	Mixed-use Neighborhood Center	5.50	173 du and/or up to 25,000 s.f. of Commercial/Retail Space
Neighborhood General	Single-family houses, carriage houses, duplexes, triplexes, bungalow courts, and rowhouses	19.52	264 du
Neighborhood Edge	Single-family houses and carriage houses on larger lots	8.47	62 du
Subtotal		**33.49**	**499**
Parks and Open Space	Barranca, parks, bikepaths, detention basin, etc.	11.62	
Subtotal		**11.62**	
Streets		22.02	
Subtotal		**21.59**	
TOTALS		**66.7**	**499**

Source: Moule & Polyzoides Architects and Urbanists, Parklands City of San Buenaventura Specific Plan No. 6.
s.f. = square feet
du = dwelling units

The proposed land use plan includes three different zone designations: (1) Corridor; (2) Neighborhood General; and (3) Neighborhood Edge. These are described below.

a. Corridor (COR). The Corridor zone is applied to the mixed-use and pedestrian-oriented Neighborhood Center as indicated as "Courtyard Housing and Live/Work" on Figure 2-4. The Neighborhood Center will accommodate a mix of up to 15,000 square feet of convenience retail, and 150 attached courtyard multi-family dwelling units with the option to designate live-work spaces. It centers on a tree-lined parking plaza marked by residences with lofts above. Its plaza will link to the southern part of the plan area by a pedestrian bridge spanning Brown Barranca. The COR zone, applied to the mixed-use and pedestrian-oriented Neighborhood Center, is intended to be occupied primarily by live-work and mixed use buildings that may accommodate retail, office, or residential uses on ground floors, and offices and residences on second and third floors.

b. Neighborhood General (NG). The intensities within the NG zone are lower than in the COR zone, with single-family attached and detached houses fronting streets, parks and

other public places. The NG zone is applied to areas intended for a variety and mix of houses, duplexes, triplexes, and bungalow courts on a variety of lot sizes.

c. Neighborhood Edge (NE). The Neighborhood Edge intensities are lower than NG densities with single-family attached and detached houses fronting streets, parks and other public spaces. Large lot executive homes are at the edge of the plan area abutting existing detached housing to the west. The NE zone is applied to areas intended for a mix of house and lot sizes, characterized primarily by detached single-family homes on larger lots.

2.4.2 Project Access, Circulation and Parking

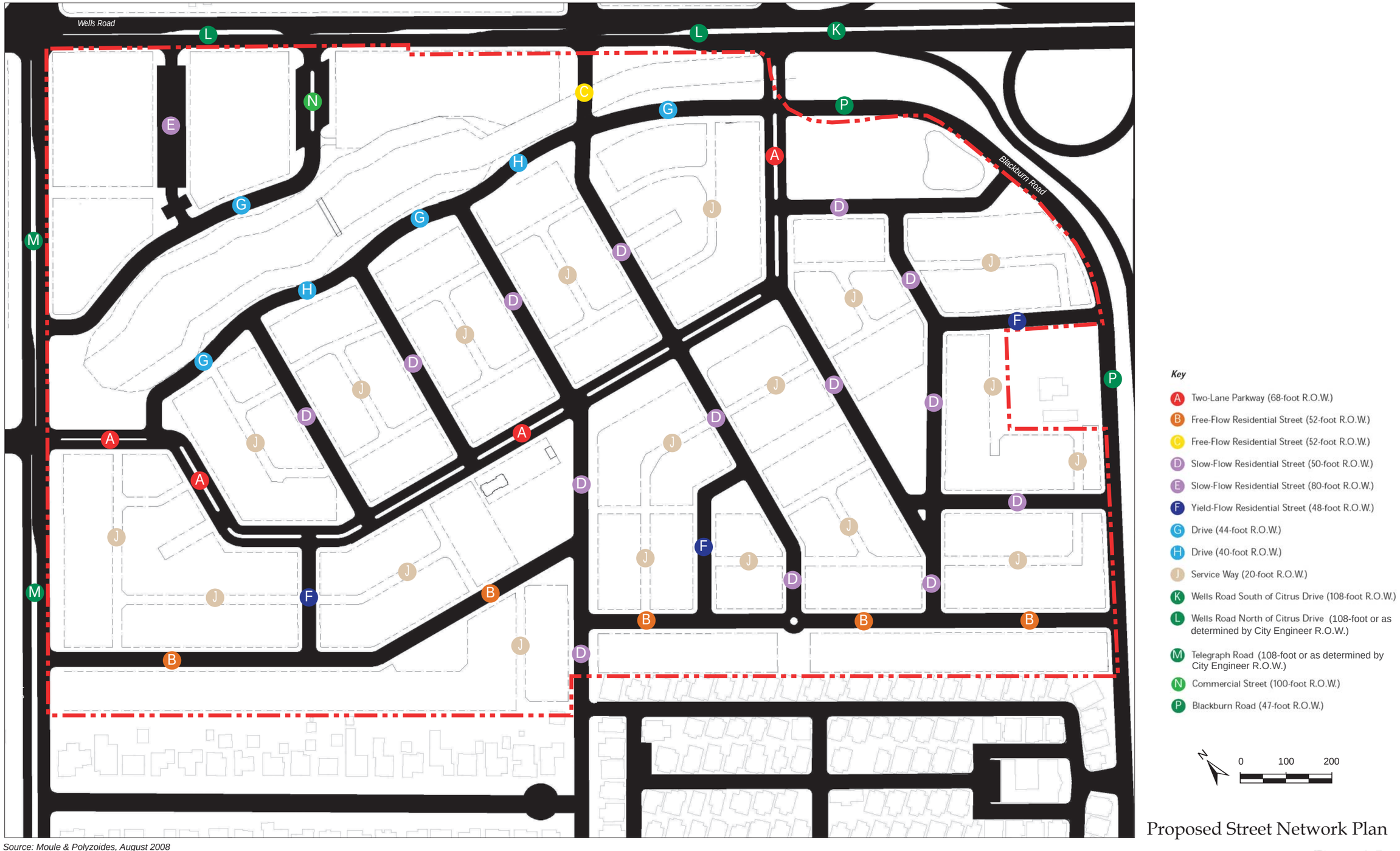
a. Project Access. Ingress and egress to the plan area is proposed via street connections to Telegraph Road, Wells Road, and Blackburn Road. Additional vehicle access is proposed with an extension of Carlos Street, which currently terminates at the eastern plan area boundary at Wells Road. The internal street network would ultimately extend west of the plan area past Linden Drive to Saticoy Avenue. In addition, the applicant proposes to extend Nevada Avenue, which currently terminates outside the plan area at the northern boundary of Telegraph Road. The Nevada Avenue extension would continue south of Telegraph Road through the plan area (see Figure 2-5).

Regional access to the plan area is provided by the Santa Paula Freeway (SR 126). Frontage improvements would include the widening of Wells Road and Telegraph Road and construction of a raised median on these roadways opposite the plan area boundary. Wells Road between Carlos Street and Telegraph Road would include two travel lanes, while Wells Road south of Carlos Street to Citrus Drive would include four travel lanes. The intersection of Wells Road with SR 126 would consist of six lanes on Wells Road. Wells Road would contain a Class II bike path on both sides of the roadway and would be designed to accommodate parallel parking.

Telegraph Road extending west from Wells Road to Saticoy Avenue would also include two travel lanes, a Class II bike lane on the south side of the road, a central median, and a 24-foot wide parkway on the north side of the street that accommodates a meandering bike path and pedestrian path.

The 2005 General Plan envisioned that these two roadway segments would be widened to secondary arterial standards with four travel lanes; however, the need for future capacity enhancements has been reevaluated and it has been determined that the roadways need not be expanded from collector standards. As a result, a General Plan amendment (AO-227) is to be included in conjunction with the Parklands Specific Plan to amend Figures 3.5 and 4.3 of the General Plan to allow the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the short term, while retaining the future widening to arterials standards in the long term. A similar General Plan amendment for Telegraph Road between Wells Road and Saticoy Avenue is proposed in conjunction with the Hansen Trust Property Specific Plan.

b. Pedestrians and Bicycles. The bicycle circulation plan would consist of Class III bike lanes within the plan area where bikes would share the road with vehicles. A Class I bike path



Source: Moule & Polyzoides, August 2008

Proposed Street Network Plan

Figure 2-5

would flank the Brown Barranca linear park and connect with the Class I bike route that continues north of Telegraph Road along the barranca. Class II bike lanes would be provided on Telegraph Road and Wells Road, while a bike/pedestrian shared path would also be constructed in a parkway on the northern side of Telegraph Road. Sidewalks would be provided throughout the plan area and a pedestrian bridge would be constructed across Brown Barranca to provide pedestrian connectivity between the residential neighborhoods west of the barranca and the mixed use neighborhood on the eastern edge of the barranca.

c. Parking. Specific Plan parking standards draw on the parking patterns of traditional American small towns and neighborhoods as precedents. Such patterns allow for a mix of uses and for the creation of a compact, tight-knit neighborhood feel. In general, single and multi-family residential units would be constructed with on-site private parking spaces, while visitor parking spaces, civic and park use parking spaces, commercial parking spaces and affordable housing parking spaces would be provided as on-street parking. Table 2-4 provides a summary of parking proposed by use.

Table 2-4
Parking Supply Summary

Use	Parking Spaces
On-Site Private Parking	
Multi-family residential	284
Single-family residential	690
Retail	55 to 66
Subtotal	**1,029 to 1,040**
On-Street Parking	
Multi-family residential	588
Single-family residential	504
Subtotal	**1,092**
Total Plan Area Parking	**2,132**

Source: Parklands Specific Plan, Section 5.2.

Networks of small blocks would allow parking on both sides of the street on most of the streets within the plan area and would accommodate for most of the neighborhood's parking demand. On-street spaces would be used to allow for more parking.

2.4.3 Community Amenities

The proposed specific plan includes 11.62 acres as open space, parks, and sensitive habitat reserve. In addition, it provides for a 6,560 square foot community building. The plan would dedicate 6.84 acres of parks to be maintained by the City through an assessment district. The

proposed linear park and bike path would become part of Ventura's linear park system. The 3.69-acre portion of Brown Barranca that crosses through the plan area would be dedicated to the City of Ventura and would be maintained by the City. The remaining parks will be privately owned and to be maintained by a Maintenance Assessment District or the Home Owners Association. Table 2-5 contains a list of the parks and greenspaces that are included in the plan area, while Figure 2-3 illustrates these areas in green.

Table 2-5
Proposed Parklands Greenspace

Greenspace	Park Type	Area (acres)	Owned by
Central Park	Active	0.83	City
Linear Park/Bike Path	Active	2.61	City
Tot lot	Active	0.09	MAD
Pocket Park	Active	0.14	MAD
Neighborhood Park 1	Active	0.5	City
Neighborhood Park 2	Active	0.23	City
Recreation Field	Active	1.44	City
Subtotal Active Recreation		**5.84**	
Pocket Park	Passive	0.06	HOA
Parkway/Allee	Passive	1.4	HOA
Rosewalk	Passive	0.20	HOA
Court	Passive	0.16	HOA
Subtotal Passive Recreation		**1.82**	
Brown Barranca Preservea	Preserve	3.69	MAD
Detention Basin/Wetlands	Preserve	--b	City
Native Restoration	Natural Preserve	--c	MAD
Subtotal Sensitive Habitat Reserve		**3.96**	
Total Greenspace		***11.35***	

Source: Moule & Polyzoides 8/30/2007
[a] includes upstream area of the Barranca between the two box culverts from Telegraph Road to the downstream culvert inlet (4.14 original acres – 1.60 acres = 2.54 acres of preserve).
[b] Detention Basin preserve park acreage is included in Recreation Field acreage.
[c] Native Restoration acreage is included in Brown Barranca acreage.

2.4.4 Design Standards

The proposed specific plan includes design guidelines regulating building frontage types, architectural styles, and landscape. These standards would regulate commercial, residential and mixed-use building designs. Various façades would be applied to each neighborhood transect and would provide major definition to the character of each street. Architectural styles

also vary with three different project specific types: Mediterranean, Craftsman, and Beach Cottage. The project's architecture is meant to convey the Ventura's demographics, culture, and climate. Furthermore, the project's landscaping guidelines promote the protection and enhancement of the open spaces and character of adjacent sites. Use of native and drought-tolerant species and preservation of native habitats is also proposed.

2.4.5 Drainage

The plan area currently drains to Brown Barranca, which traverses the plan area from Telegraph Road in a southeasterly direction to Wells Road at Blackburn Road. The drainage continues off-site as a concrete channel beneath Blackburn Road and parallel to Wells Road. Brown Barranca is currently deficient in capacity at Highway 126, south of the site for large storm flow events (100-year storm), but adequate for lesser storm flow events (10-year storm). The Parklands Specific Plan would provide storm drainage in a network of grassy swales, ultimately discharging 100-year or lesser storms to a detention basin proposed in the southeast corner of the plan area. The culvert improvements and detention basin proposed with the specific plan would address existing deficiencies and project generated stormwater increases along Brown Barranca within the plan area and downstream.

Approximately 1,660 linear feet of Brown Barranca traverses the plan area from the northern boundary at Telegraph Road to the southeastern boundary at Blackburn Road and Wells Road. The applicant proposes to preserve 860 linear feet of the barranca, while modifying the remaining portions (725 linear feet) both upstream and downstream of the preserved portion. The preserved area would be excluded from public access through fencing and barrier plantings and would encompass existing unaltered riparian habitat as well as restored riparian habitat where invasive species currently occur.

The modifications to Brown Barranca include extending the existing arched concrete apron by 75 feet at the barranca's entrance to the plan area (along the southern edge of Telegraph Road) to prevent scouring downstream, culverting 725 linear feet of barranca in a triple box culvert downstream of the preserve(upstream of the Blackburn Road crossing), and converting the existing double box culvert tie in located at the downstream end of the plan area (at the Blackburn Road crossing) to a triple box culvert. Upon completion of the undergrounding activities, a manmade revegetated streambed would be reconstructed above the culvert and would empty into the existing concrete trapezoidal channel, which continues downstream of the project area south of Blackburn Road extending past SR 126. A pedestrian bridge would also be constructed across Brown Barranca to connect the commercial center in the northeastern corner of the plan area to the residential areas southwest of the barranca.

The improvements to Brown Barranca were based on the improvements recommended in a Ventura County Watershed Protection District Study entitled "Brown Barranca Pre-Design Report" that was prepared by HDR Engineering and finalized in August 2005. The proposed barranca treatment utilizes the design concepts in that report, adding additional culvert cells and replacing the intermediate open channels to facilitate extension of Carlos Street westward into the plan area between Blackburn Road and Telegraph Road along Wells Road.

2.4.6 Site Preparation and Construction

Plan area development would occur in phases, with the earthwork and infrastructure commencing as the first phase. The second phase would involve development of models for each of the six different product types. Subsequent phases would each involve construction of 30 to 40 homes, with a three-month overlap of these phases. However, the building construction phase is market driven, which may cause construction to proceed faster or slower depending on market conditions.

2.5 PROJECT OBJECTIVES

The primary objective of the proposed Parklands Specific Plan is to create a financially viable traditional neighborhood that embodies the principles of New Urbanism through emphasizing the public realm, creating pedestrian friendly streets and blocks, and providing a diversity of uses and building types that will generate a distinct sense of neighborhood identity. Parklands is one of the first Traditional Neighborhood Development in the City of Ventura and is intended to bring together New Urbanist ideals, city planning, and livable spaces.

2.6 REQUIRED APPROVALS

Implementation of the proposed Parklands Specific Plan would require the following discretionary approvals from the City and other agencies:

Required Discretionary City Approvals

- *Certification of the EIR*
- *Annexation, Case No. A-327 for the following three parcels totaling 54.36 acres*
  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*
- *Specific Plan Approval, Case No. SP-6*
- *Zone Change for City designated parcels (R-1-7 to SP-6) and prezoning for County designated parcels (SP-6), Case No. Z-916*
- *General Plan Amendment ~~AO-227~~ MP-161 to amend Figures 3.5 and 4.3 of the General Plan to allow the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the near term, while retaining the option for widening to arterial standards in the long term.*
- *Tentative Tract Map S-5632*
- *Design Review, Case No. ARB-2985*
- *Planned Development Permit, Case No. PD-861*

Discretionary Approvals Required from Other Agencies

- *Ventura County Local Agency Formation Commission - LAFCO approval of reorganization, including annexation to the City of Ventura for the following three parcels totaling 54.36 acres, with simultaneous detachment of the same area from the Ventura County Resource Conservation District and the Ventura County Fire Protection District*

  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*
- *Ventura County Watershed Protection District approval of modifications to Brown Barranca*
- *Department of Fish and Game Streambed Alteration Agreement*
- *U.S. Army Corps of Engineers 404 permit*
- *Caltrans Encroachment Permit for any work in the SR 126 and SR 118 right-of-way*

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3.0 ENVIRONMENTAL SETTING

This section describes the current environmental conditions throughout the plan area and in the general vicinity. More detailed descriptions of the setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 REGIONAL SETTING

The City of Ventura has an estimated 2008 population of 108,261 (California Department of Finance, January 2008). Ventura is situated 25 miles southeast of Santa Barbara and 60 miles northwest of Los Angeles. Ventura is situated between the Pacific Ocean, the Ventura foothills, and lies between the Ventura and Santa Clara rivers. The City is located at the western edge of the Oxnard Plain, an alluvial plain that covers over 200 square miles in the southern portion of Ventura County. Much of the City is on relatively flat coastal plain, but steeply sloped hills abut the northern portion of the community. The western portion of the City stretches north along the Ventura River and is characterized by a narrow valley with steeply sloped areas along both sides.

Ventura has a Mediterranean climate and the coastline helps to produce moderate temperatures year round, with rainfall concentrated in the winter months. Ocean breezes cool the region in the summer and warm it in the winter. Average daytime summer temperatures in the area are usually in the high 70s to 80s (Fahrenheit). Nighttime low temperatures during the summer are typically in the high 50s to low 60s, while the winter high temperature tends to be in the 60s. Characteristic of Ventura's semi-marine microclimate, the winter low temperatures are in the 40s. Annual average rainfall in Ventura is about 15 inches. The region is subject to various natural hazards, including earthquakes, landslides, flooding, and wildfires.

3.2 PLAN AREA SETTING

The Parklands plan area is located near the eastern edge of Ventura, about 10 miles from downtown Ventura. The plan area is bordered by Blackburn Road to the south, Wells Road to the east, and Telegraph Road to the north. Residential development of single family homes and mobile homes lies immediately west of the plan area. The Santa Paula Freeway (SR 126) runs parallel to Blackburn Road, south of the plan area and serves as the regional connector. A single family residence lies between the plan area and Blackburn Road.

The plan area is currently in row crop agricultural production. The crop is annual flowers and a caretaker's mobile home exists in the northern central portion of the property, adjacent Telegraph Road. Other agricultural uses in the vicinity include row crops and orchards northeast of the intersection of Wells Road at Telegraph Road, and further to the west and northwest beyond existing residential development (see Figure 2-2 in Section 2.0 *Project Description*). Across Wells Road to the east are commercial retail uses, educational facilities, a medical office, and a private water reservoir. To the north of the project site are a neighborhood of single-family detached houses, a medical office building, and an assisted-living retirement community.

Brown Barranca bisects the plan area with both natural bottom and concrete portions from Telegraph Road to Blackburn Road at Wells Road. The barranca is a natural bottom channel to the north across Telegraph Road, but is a concrete channel south of Blackburn Road. The barranca contains a mix of native and non-native plant species, some of which are invasive weedy species. Dominant species include arroyo willow, California walnut, eucalyptus, German ivy, and castor bean. A total of 38 species of birds were noted in the plan area during a spring breeding survey (Rincon Consultants, May 2008). Previous biological investigations documented that raccoon, black rat, gray fox, domestic cat, coyote, striped skunk, and dusky footed-wood rat were present within the plan area. No reptiles or fish were observed within the plan area during previous biological investigations (Padre and Associates, 2007, Rincon Consultants, Inc. 2007; however, African clawed frogs were observed in ponded areas of the barranca during night surveys (Rincon Consultants, July 2008).

Portions of the plan area are within a 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA). The floodplain boundaries mapped by FEMA differ from the boundaries that were mapped by the project hydrological consultant, which are based on current existing physical conditions (Omrun Engineering, 2008). In addition, portions of the plan area are subject to noise in excess of the normally allowable residential exterior standards of 65 decibels average, due to the proximity of traffic on SR 126, Telegraph Road and Wells Road (Padre Associates, 2007).

3.3 CUMULATIVE PROJECTS

CEQA defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

The cumulative impact analysis contained in this EIR relies primarily on the forecasts of future growth in Ventura, as envisioned in the 2005 General Plan EIR. Table 3-1 lists predicted citywide development intensity in 2025 from the 2005 General Plan EIR.

The proposed project is located geographically near the eastern boundary of the City of Ventura. Cumulative development in the City of Ventura is spread geographically throughout the City. Some impacts are not necessarily cumulatively considerable in relation to development that occurs further from the proposed specific plan. For example, aesthetic and noise impacts associated with the Parkland Specific Plan are not likely to contribute to such impacts in the western region of the City, whereas their relevance is more profound within an area closer to the plan area. Therefore, some individual cumulative impact discussions in their respective issue area sections of the EIR may rely on a portion of the overall total future development, depending on the issue area and the type of impact. These are noted in the

cumulative impact discussions as appropriate. Other issue areas consider the overall General Plan buildout cumulative development.

Table 3-1
Cumulative Development

Land Use	Development Potential
Residential	**8,318 units**
Non-Residential	
Retail	1,241,377 sf
Office	1,213,214 sf
Industrial	2,235,133 sf
Hotel	530,000 sf
Non-Residential Total	**5,219,724 sf**

Source: City of Ventura, Final 2005 General Plan, Environmental Impact Report Supplement, June 2007.

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4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the possible environmental effects of the proposed project for the issue areas that were identified as having the potential to experience significant impacts. "Significant effect" is defined by Section 15382 of the State CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant."

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

> ***Class I, Significant and Unavoidable:*** *An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the State CEQA Guidelines.*
>
> ***Class II, Significant but Mitigable:*** *An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings to be made under §15091 of the State CEQA Guidelines.*
>
> ***Class III, Not Significant:*** *An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.*
>
> ***Class IV, No Impact or Beneficial:*** *An effect that would reduce existing environmental problems or hazards or no change in environmental conditions would occur.*

As indicated above, significant positive effects are also noted (Class IV) in addition to the adverse effects (Class I through III). Following each environmental effect discussion is a listing of recommended mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measures. In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed as a residual effect. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other future development in the area.

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4.1 AESTHETICS

This section evaluates potential impacts to views, visual conditions, and light and glare resulting from facilitated development by implementation of the Parklands Specific Plan.

4.1.1 Setting

a. Visual Character of Ventura. Ventura is located on the edge of the Pacific Ocean adjacent to the north of the City of Oxnard. The City has a wide variety of landscapes and seascapes, including natural, agricultural, and urban components. The northern portion of the City consists of rolling hills and steep mountains of the coastal range and transitions into the coastline. The Ventura coastline is a combination of both sandy beaches and man-made rocky structures. The Santa Clara River forms the southeastern boundary of the City and serves as an important visual element of the City. Agricultural activity is prevalent in portions of both East and West Ventura. The large parcels of farmland in East Ventura interspersed with suburban residential developments provide a visual break from the suburban land use pattern.

U.S. 101 and the SR 126 function as the arteries of movement in the City. Community shopping centers and highway-oriented uses are concentrated along these corridors. The U.S. 101 affords views of hillsides, mountains, and the coast. SR 126 provides the City with regional access from the east. Views of green fields and ridgelines of mountains to both the north and south are available this highway. Views from these highways within the City consist primarily of commercial and residential development, although some agricultural lands remain and are visible as one travels through the City.

b. Visual Character of the Plan Area. The plan area is visible from SR 126, Wells Road, and Telegraph Road, all of which are identified in the City of Ventura's 2005 General Plan as view corridors having scenic value, offering background views of the hillsides behind the City.

The plan area encompasses approximately 66.7 acres. Topography within the plan area is mostly flat, but trends gently upwards from Brown Barranca to which the plan area drains. The plan area is currently developed with row crop agriculture and hoops or temporary greenhouses under which additional row crops are grown. Depending on the vantage and the season, one may view attractive cultivated fields, or weeds and other visually unattractive elements, including rusting farm equipment, storage areas with discarded containers, garbage, encampments and other similar items associated with a lack of maintenance.

Existing uses adjacent to the plan area include residential development to the west and north, commercial to the east, and Blackburn Road and the SR 126 to the south. Agricultural uses are present northeast of the plan area north and east of the Foothill Road/Wells Road intersection and about 450 feet west of the plan area at the intersection of Telegraph Road and Saticoy Avenue.

c. Existing Views of the Plan Area. Typical views of the plan area are shown in Figure 4.1-1. Principal travel corridors are important to an analysis of aesthetic features because they define the vantage point for the largest number of viewers. Included in these are the SR 126, Wells Road, and Telegraph Road. Existing views from each of these roadways are shown on Figures 4.1-2 and 4.1-3. A description of each view corridor follows.

Photo 1 - Plan Area interior looking south from Telegraph Road.

Photo 2 - Typical existing view of Plan Area looking north.

Existing Conditions

Figure 4.1-1

Photo 1 - Plan Area looking north from SR 126 eastbound.

Photo 2 - Plan Area looking north from SR 126 westbound.

Photo 3 - Wells Road Corridor looking north including Plan Area to left.

SR 126 and Wells Road View Corridors

Figure 4.1-2

Photo 1 - Telegraph Road corridor looking east.

Photo 2 - Telegraph Road corridor looking north.

Telegraph Road View Corridor

Figure 4.1-3

State Route 126 (SR 126). SR 126 is the primary regional highway serving the area. SR 126 offers panoramic views of agriculture, and mountains. The plan area is nearly level with SR 126 and viewers traveling westbound on SR 126 have a short uninterrupted view of the plan area with foothills and mountains in the background (see Photo 2, Figure 4.1-2). Obstructions for the westbound viewer include shrubs along SR 126 and the off- and on-ramp at the SR 126/Wells Road intersection (see Photo 1, Figure 4.1-2). Eastbound viewers have interrupted views of the plan area due to a vegetated median that separates eastbound and westbound travelers on the SR 126. The ridgelines to the north are located at elevations approximately 800 feet higher than the freeway elevation at a distance of approximately one mile from the freeway.

Wells Road. Traveling north along the eastern boundary of the plan area, Wells Road has a short decline after crossing the SR 126. This provides views of the plan area, views of the hills, and views of agricultural areas on the east side of the road at the base of the hills as one travels farther up the roadway away from SR 126. Views of the plan area along Wells Road are uninterrupted and include views of the row crops and Brown Barranca. Commercial and residential development are visible along the Wells Road and Telegraph Road frontages (see Photo 3, Figure 4.1-2).

Telegraph Road. Telegraph Road is generally level with the plan area and no obstructions are present between the road and plan area. Telegraph Road crosses through a mix of agricultural and residential suburban areas. Portions of this road offer views of the foothills and mountains to the north and east (see Photos 1 and 2 on Figure 4.1-3). However, development obstructs portions of these views (see Photo 2, Figure 4.1-3).

d. Light and Glare. Nighttime lighting in the plan area vicinity results from several sources of artificial light, including lights along Highway 126, other streetlights, automobile lights, and residential and commercial building lights. Sources of glare in the vicinity consist predominantly of vehicles in parking lots and on roadways as well as the windows of buildings, which reflect the sunlight. Nighttime lighting sources in the plan area are limited as the area includes agricultural production. Some relatively low-level night lighting is associated with commercial uses to the east and north of the plan area. Land uses in the vicinity of the plan area that are most sensitive to nighttime lighting and glare are the adjacent residences to the north and west, as well as motorists traveling along SR 126.

e. Regulatory Setting. Development in the City is subject to the following regulatory programs aimed in part at the preservation of the community's visual character.

<u>2005 General Plan</u>. The City of Ventura's General Plan has designated SR 126, Wells Road, and Telegraph Road (east of Victoria Avenue) as view corridors having scenic value. Policy 4D of the General Plan requires the protection of views along scenic routes, and Action 4.36 requires development along these roadways – including noise mitigation, landscaping, and advertising – to respect and preserve views of the community and its natural context. In addition, Action 4.37 requests that SR 126 be designated as a State Scenic Highway.

<u>Zoning Ordinance</u>. The Zoning Ordinance establishes setback, parking and sign standards, building height limits, hillside development restrictions, and building densities. However, if

approved and implemented, the Parklands Specific Plan itself would supersede the zoning ordinance with respect to design guidelines and development standards for the plan area.

4.1.2 Impact Analysis

a. Methodology and Significance Thresholds. Different viewers react to viewsheds and aesthetic conditions differently. Consequently, the assessment of aesthetic impacts is inherently subjective in nature. This evaluation measures existing plan area visual resources against development facilitated by the proposed Specific Plan, analyzing the nature of the anticipated change. The design guidelines of the Specific Plan were reviewed for policy instruction relative to visual resources and community design to determine compatibility with adjacent land uses.

Wells Road, Telegraph Road and SR 126 are designated in the 2005 General Plan as corridors having scenic value. As a result, the proposed development is evaluated from these public viewing corridors to determine whether it affects views of the community and its natural context pursuant to Action 4.36.

To determine the impacts of the proposed project related to light and glare, uses sensitive to light and glare in the vicinity of the proposed project were identified. These sensitive uses include residences to the north and west of the plan area. The existing sources and amounts of light and glare within the plan area were compared with the amount of light and glare that would occur permanently through development of the plan area.

The IS/MND previously prepared for the proposed specific plan concluded that impacts relating to light and glare would not be significant and the City received no comments on the draft IS/MND providing evidence that significant light or glare impacts would occur. Therefore, aesthetic impacts are considered significant if plan area development would:

- *Affect a scenic route or approach or vista open to public view*
- *Result in an aesthetically offensive site or condition open to public view*

b. Project Impacts and Mitigation Measures.

Impact AES-1 Plan area development would alter the visual character of the plan area, but would not block views of ridgelines to the north of the plan area from SR 126. However, a freeway sound wall proposed in Section 4.8, *Noise*, would partially block views from the freeway and would potentially create a monolithic structure as viewed from the freeway. Impacts associated with the sound wall would be Class II, *significant but mitigable*.

Travel corridors provide views of the plan area for the greatest quantity of viewers. As identified in the *Setting*, SR 126, Wells Road, and Telegraph Road (east of Victoria Ave) are documented in the 2005 General Plan as offering high quality views of the community and its natural context. Implementation of the proposed specific plan has the potential to affect views from these roadways.

The specific impacts to affected view corridors associated with this change in land use are described below.

SR 126. Following development, the most noticeable change to viewers traveling along SR 126, would be the presence of a 14-21 foot tall sound wall along the south side of Blackburn Road in addition to second story development that would be visible above the wall. Figure 4.8-2 in Section 4.8, *Noise,* shows the location of the wall, which would transition from 14 feet tall opposite the southern boundary of lot 263 (triangle shaped pocket park), to 18 feet tall at the western boundary of Road "I" (see Figure 4.8-2). The wall would continue from the western boundary of Lot "I" at 19 feet tall, transitioning to 21 feet tall and continue at this height to about 75 feet past the western boundary of the plan area (see Figure 4.8-2). It is noted that other wall scenarios, such as a garden wall or a combination garden wall and sound wall would result in a shorter wall adjacent SR 126 (see figures 1 and 2 in the Barrier Analysis contained in Appendix G). However, these other combination walls would also separate the residences from Blackburn Road, creating a walled-in community. Moreover, the only option offering full protection for the existing residence at the southern edge of the plan area is a sound wall that would be constructed along the southern edge of Blackburn Road.

Photos 1-2 on Figure 4.1-2 show views of the plan area and mountains in the background from SR 126. Photo 2 on Figure 4.1-2 shows a chain link fence in the foreground along the SR 126 frontage looking towards Blackburn Road and the project site. Given the distance across the road and the proposed 14-21 foot wall on the south side of Blackburn Road, views of the mountains in the background would be partially obstructed.

The freeway is approximately level with the eastern portion of the plan area; however, the western portion of the plan area is about seven feet higher than the freeway. Eastbound viewers are separated from the proposed wall by approximately 130 feet, including a median with two lanes of traffic a westbound freeway entrance lane, and right of way. Westbound viewers would be approximately 60 feet from the sound wall. The ridgelines to the north are located at elevations approximately 800 feet higher than the freeway elevation at a distance of approximately one mile from the freeway.

Based on the wall height, distance from the viewers to the wall, and distance to the hillsides behind the wall, views of the hillsides from the portion of SR 126 adjacent the plan area would be obstructed by a continuous and potentially monolithic wall. The creation of a monolithic structure along the freeway edge would potentially create an aesthetically offensive condition and is therefore a potentially significant impact.

Wells Road. Following development, viewers along Wells Road would see primarily multi-family residential structures if looking to the west. The visually sensitive designation for Wells Road is intended to preserve views of the hillsides, which are visible when traveling northbound toward the hillsides at the terminus of Wells Road. The proposed development would not interfere with views of the hillsides, as the Wells Corridor leads straight to the hillsides, while the proposed development would occur adjacent the western boundary of Wells Road. Thus, the project's effects with respect to the Wells Road visual corridor and obstruction of hillside views would be less than significant.

Telegraph Road. With respect to Telegraph Road, the proposed development would occur south of Telegraph Road, whereas the closest hillsides lie to the north. The distant hillsides to the south and east would be partially obscured by plan area development; however, the hillsides to the southeast are more than two miles away and, therefore, are not prominent visual features from Telegraph Road. Thus, although the proposed development would alter the character of views to the south by converting agricultural land to residential use, it would not obstruct views of the hillsides to the north. Consequently, the visual effect of plan area development along the Telegraph Road corridor would be less than significant.

Mitigation Measures. The following mitigation measure would offset the visual impact associated with construction of the proposed sound wall.

AES-1 **Soundwall Aesthetics.** Views of the proposed sound wall abutting SR 126 shall be softened through installation of landscaping such as trees, shrubs and climbing vines, resulting in a variety of textures and colors. Prior to Final Map approval, the Design Review Committee shall review and approve landscaping and irrigation plans. Prior to occupancy of any dwelling unit within the plan area, the sound wall, landscaping and irrigation shall be installed.

Significance After Mitigation. Measure AES-1 would soften the effect of the proposed freeway sound wall and eliminate the potential for an offensive aesthetic condition along the freeway corridor. Thus, impacts would be reduced to a less than significant level.

Impact AES-2 **Development facilitated by the proposed Specific Plan would alter the visual character of the plan area by replacing existing agricultural land with residential and commercial uses. Although some individuals may view this change as adverse, the change for this area was envisioned in the Ventura General Plan and the proposed development would not create an aesthetically offensive condition. Thus, the impact to the plan area's visual character is considered Class III, *less than significant*.**

The Parklands Specific Plan would facilitate the development of up to 499 residences, a community center, and a retail pocket that includes live/work opportunities. Implementation of the proposed specific plan would alter the aesthetic character of the plan area by transforming it from rural agricultural and to a more urbanized environment. The specific plan would accommodate infill development in an area that is surrounded by urban/suburban development on all four sides.

The 2005 General Plan FEIR identified aesthetic impacts associated with the alteration of views from major public view corridors, including SR 126, as significant. Under Scenario 1 (Intensification/Reuse Only) of the 2005 General Plan FEIR, the plan area was included as one of a number of properties already designated for non-agricultural use under the previous Comprehensive Plan. In conjunction with adoption of the 2005 General Plan, the City Council considered the impacts to public views due to the conversion of agricultural lands within the City's sphere of influence, including the plan area, and determined that the public benefits of

the General Plan outweigh certain unavoidable adverse environmental effects, including aesthetic impacts associated with the conversion of agricultural land. A Statement of Overriding Consideration was adopted. Therefore, the project would not have a significant aesthetic impact associated with the conversion of agricultural land to non-agricultural use beyond that already been identified in a prior impact assessment and documented in the certified 2005 General Plan FEIR.

The neighborhood is designed to be aesthetically interesting, offering small scale pedestrian friendly streets, bikeways, park spaces, and a variety of architectural styles and housing sizes (see Figure 2-4 in Section 2.0, *Project Description*). Development facilitated by the specific plan would alter the visual character of the existing environment, but proposed development would not create any visually offensive condition. Development under the specific plan would create a more continuous neighborhood environment, scaling back the vehicular travel lanes along Wells Road and Telegraph Road in the vicinity of the plan area to create a single travel lane in each direction, bike paths, landscaped medians and parkways.

All development accommodated under the specific plan would be reviewed by the City's Design Review Committee to further ensure that the development would be compatible with surrounding neighborhoods and consistent with the Parklands Specific Plan design guidelines. Therefore, although change in visual character would be substantial as residences and commercial development would replace the existing row crops, specific plan implementation would not create an offensive aesthetic condition. This impact would be less than significant.

Mitigation Measures. None required as the proposed specific plan would not create an offensive aesthetic condition.

Significance after Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add more than 8,300 dwelling units, as well as about 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development. The aesthetic impacts of individual projects can often be mitigated through careful site design, avoidance of significant visual features, and appropriate building and landscape standards.

Development facilitated by the proposed Specific Plan, in conjunction with other development in the area, most notably the UC Hansen Trust property located adjacent to the west of the mobile home park, could have potentially significant impacts. Both of these projects would develop existing agricultural uses to residential uses. This loss would contribute to the overall cumulative change in the aesthetic character of Ventura.

Development of walls, including the UC Hansen Trust sound wall in association with this sound wall, would alter views from SR 126, incrementally increasing the amount of time in which views of the hills to the north would be blocked for SR 126 motorists. The wall proposed for this project would extend for about 1,000 feet, while the wall for the UC Hansen Trust project would extend about 1,000 feet. These walls as preliminarily configured are separated by

a gap of about 130 feet, and could become connected to form one continuous barrier that would also provide complete coverage for the existing mobile home park. The aesthetic effect of cumulative wall construction would be mitigated on a case-by case basis through landscaping or artwork. The construction of walls along the SR 126 frontage was considered during the 2005 General Plan update and was recommended along SR 126 to protect existing residences such as the residence located at the southern boundary of the Parklands plan area and the existing Country Estates Mobile Home park. Therefore, the cumulative impact of this project in association with the UC Hansen Trust project relative to wall massing along the SR 126 would be less than significant.

Cumulative development along SR 126 would result in significant cumulative visual impacts to that freeway corridor. However, as discussed under Impact AES-2, this cumulative impact was already identified in the 2005 General Plan FEIR and the City Council adopted a Statement of Overriding Considerations for that impact. Currently planned and pending development would not create any cumulative impact beyond that identified in the 2005 General Plan FEIR.

4.2 AIR QUALITY

This section analyzes the impacts of the Parklands Specific Plan upon local and regional air quality. Both temporary impacts relating to construction activity and long-term impacts associated with population growth and associated growth in vehicle traffic and energy consumption are discussed. Impacts relating to global climate change are also discussed at the end of this section.

4.2.1 Setting

a. Local Climate and Meteorology. The semi-permanent high pressure system west of the Pacific coast strongly influences California's weather. It creates sunny skies throughout the summer and influences the pathway and occurrence of low pressure weather systems that bring rainfall to the area during October through April. As a result, wintertime temperatures in Ventura are generally mild, while summers are warm and dry. During the day, the predominant wind direction is from the west and southwest, and at night, wind direction is from the north and generally follows the Santa Clara River Valley.

Predominant wind patterns are occasionally broken during the winter by storms coming from the north and northwest and by episodic Santa Ana winds. Santa Ana winds are strong northerly to northeasterly winds that originate from high pressure areas centered over the desert of the Great Basin. These winds are usually warm, very dry, and often full of dust. They are particularly strong in the mountain passes and at the mouths of canyons.

Daytime summer temperatures in the area average in the high 70s to the low 90s. Nighttime low temperatures during the summer are typically in the high 50s to low 60s, while the winter high temperatures tend to be in the 60s. Winter low temperatures are in the 40s. Annual average rainfall in Ventura ranges from about 14 to 16 inches, the majority of which falls in winter months.

Two types of temperature inversions (warmer air on top of colder air) are created in the Ventura County area: subsidence and radiational (surface). The subsidence inversion is a regional effect created by the Pacific high in which air is heated as it is compressed when it flows from the high pressure area to the low pressure areas inland. This type of inversion generally forms at about 1,000 to 2,000 feet and can occur throughout the year, but is most evident during the summer months. Surface inversions are formed by the more rapid cooling of air near the ground at night, especially during winter. This type of inversion is typically lower and is generally accompanied by stable air. Both types of inversions limit the dispersal of air pollutants within the regional airshed. The primary air pollutant of concern during the subsidence inversions is ozone, while carbon monoxide and nitrogen oxides are of greatest concern during winter inversions.

b. Local Regulatory Framework. Both the federal and state governments have established ambient air quality standards for the protection of public health. The U.S. Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent in the California Environmental Protection Agency. Local control in air quality management is provided by the CARB through county-level Air Pollution Control Districts (APCDs). The

CARB has established air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The CARB has established 14 .air basins statewide. In addition, the City further regulates air quality through the City's Air Quality Ordinance (Ordinance 93-37). This ordinance requires developers of projects that generate emissions exceeding Ventura County APCD (VCAPCD) significance thresholds to pay air quality impact fees that are placed in a transportation demand management (TDM) fund that is used by the City to offset project emissions through implementation of regional air quality programs.

The USEPA has set primary national ambient air quality standards (NAAQS) for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), suspended particulates, known as PM_{10} (particulate matter with a diameter of 10 microns or less) and $PM_{2.5}$ (particulates of less than 2.5 microns in diameter), and lead (Pb). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, the State of California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards. Table 4.2-1 lists the current Federal and State standards for regulated pollutants.

Table 4.2-1
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.075 ppm	0.07 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.03 ppm
	1-Hour	---	0.18 ppm
Sulfur Dioxide	Annual	0.03 ppm	---
	24-Hour	0.14 ppm	0.04 ppm
	1-Hour	---	0.25 ppm
PM_{10}	Annual	---	20 µg/m^3
	24-Hour	150 µg/m^3	50 µg/m^3
$PM_{2.5}$	Annual	15 µg/m^3	12 µg/m^3
	24-Hour	35 µg/m^3	--
Lead	30-Day Average	---	1.5 µg/m^3
	3-Month Average	1.5 µg/m^3	---

ppm = parts per million
µg/m^3 = micrograms per cubic meter
Source: California Air Resources Board, www.arb.ca.gov/research/aaqs/aaqs2.pdf, April 1, 2008.

Ventura County has been listed as "moderate nonattainment" for the eight-hour ozone standard with an estimated attainment date of June 2010.

The USEPA has issued a staff paper regarding the policy implications of the latest scientific and technical information regarding particulate matter. In this report, USEPA staff recommends continuing the $PM_{2.5}$ annual standard while reducing the 24-hour standard to between 25-35 $\mu g/m^3$ or reducing the annual standard to 12 $\mu g/m^3$ (same as California standard) and the 24-hour standard to 35-40 $\mu g/m^3$. The PM_{10} standard is recommended to be revised to not include the 2.5 micron increment.

Ventura is located in the Ventura County portion of the South Central Coast Air Basin. The VCAPCD is the designated air quality control agency in the Ventura County portion of the Basin. The Ventura County portion of the South Central Coast Air Basin is a state and federal non-attainment area for ozone (1-hour and 8-hour, respectively) and a state non-attainment area for suspended particulates (PM_{10} & $PM_{2.5}$). In addition, though the Ventura County portion of the South Central Coast Air Basin is in attainment for the state and federal carbon monoxide standards, carbon monoxide can potentially be a problem at heavily congested intersections. Each of these pollutants is described below. The City of Ventura is within the "Ventura growth area."

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

Suspended Particulates. PM_{10} is small particulate matter measuring no more than 10 microns in diameter. It is mostly composed of dust particles, nitrates, and sulfates. PM_{10} is a by-product of fuel combustion and wind erosion of soil and unpaved roads, and is directly emitted into the atmosphere through these processes. PM_{10} is also created in the atmosphere through chemical reactions. Particles less than 10 micrometers in diameter (PM_{10}) pose a health concern because they can be inhaled into and accumulate in the respiratory system. Particles less than 2.5 micrometers (=microns) in diameter ($PM_{2.5}$) are referred to as "fine" particles and are believed to pose the greatest health risks. Because of their small size (approximately 1/30th the average width of a human hair), fine particles can lodge deeply into the lungs. Fine particulate matter is composed primarily as a by-product of combustion, while matter between 2.5 and 10 microns is mostly dust from roads and grinding or crushing operations. Fine particulate matter poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

An important fraction of the particulate matter emission inventory is that formed by diesel engine fuel combustion. Particulates in diesel emissions are very small and readily respirable. The particles have hundreds of chemicals adsorbed onto their surfaces, including many known or suspected mutagens and carcinogens. The California Office of Environmental Health Hazard Assessment (OEHHA) reviewed and evaluated the potential for diesel exhaust to affect human

health, and the associated scientific uncertainties (California EPA, ARB, April 1998). Based on the available scientific evidence, a level of diesel PM exposure below which no carcinogenic effects are anticipated has not been identified. The Scientific Review Panel that approved the OEHHA report determined that based on studies to date that 3×10^{-4} $(\mu g/m^3)^{-1}$ is a reasonable estimate of the unit risk for diesel PM. This means that a person exposed to a diesel PM concentration of 1 $\mu g/m^3$ continuously over the course of a lifetime has a 3 per 10,000 chance (or 300 in one million chance) of contracting cancer due to this exposure. Based on an estimated year 2000 statewide average concentration of 1.26 $\mu g/m^3$ for indoor and outdoor ambient air, about 380 excess cancer cases per one million population could be expected if diesel PM concentrations remained the same (ARB, October 2000).

Diesel PM emissions are estimated to be responsible for about 70% of the total ambient air toxics risk. In addition to these general risks, diesel PM can also be responsible for elevated localized or near-source exposures ("hot spots"). Depending on the activity and nearness to receptors, these potential risks can range from small to 1,500 per million or more (ARB, October 2000). Risk characterization scenarios have been conducted by the ARB staff to determine the potential excess cancer risks involved due to the location of individuals near to various sources of diesel engine emissions, ranging from school buses to high volume freeways.

Diesel PM emissions are expected to decline 30% from 2000 to 2020 due to currently adopted on-road standards and fleet turnover as new vehicles with controls replace older vehicles with little or far less effective controls, but such reductions will not be sufficient to fully reduce the existing risk. In addition, ARB staff have prepared a Diesel Risk Reduction Plan (ARB, October 2000) that includes a comprehensive plan to further reduce diesel PM emissions. The ARB is in the process of developing specific regulations to implement the plan. The basic concept is to require all new diesel-fueled vehicles and engines to use state-of-the-art catalyzed diesel particulate filters (DPFs) and very low-sulfur diesel fuel. Also, where technically and economically feasible, the ARB staff recommends that existing vehicles and engines should be retro-fitted to further reduce particulate emissions. For example, the ARB in 2001 adopted new PM and NO_x emission standards to clean up large diesel engines that power big-rig trucks, trash trucks, delivery vans and other large vehicles. The new standard for PM takes effect in 2007 and reduces emissions to 0.01 gram of PM per brake horsepower-hour (g/bhp-hr.), a 90% reduction from the existing standard.

The USEPA is also working to reduce the emissions from diesel engines. The USEPA finalized a new rule in December 2000 for on-road vehicles requiring petroleum refiners to remove all but 15 ppm of sulfur from diesel fuel by mid-2006, and requiring engine makers to reduce particulate matter emissions by almost 90% and NO_x levels by up to 95% for new engines by the model year 2007.

Carbon Monoxide. Carbon monoxide, a colorless, odorless, poisonous gas, is a local pollutant that is found in high concentrations only very near the source. The major source of carbon monoxide is automobile engines. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

c. Current Ambient Air Quality. The Air Quality Monitoring Station at El Rio is the nearest to the City and most representative of air quality in the plan area vicinity. The El Rio monitoring station measures ozone, NO_2, PM_{10}, and $PM_{2.5}$. The closest monitoring station reporting CO is the Goleta-Fairview station in Santa Barbara. There are no CO monitoring stations in Ventura County. Table 4.2-2 lists the ambient air quality data for the El Rio and Goleta-Fairview monitoring stations.

Table 4.2-2
Ambient Air Quality Data Concentrations

Pollutant	Air Pollution Data		
	2005	2006	2007
Ozone, ppm - maximum hourly concentration (ppm)	0.076	0.089	0.089
Number of days of state exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.12 ppm)	0	0	0
Ozone, ppm - maximum 8-hour concentration (ppm)	0.068	0.070	0.072
Number of days of State exceedances (>0.07 ppm)	0	0	1
Number of days of federal exceedances (>0.08 ppm)	0	0	0
Carbon Monoxide, ppm - Worst 8 Hours[a]	0.83	0.80	1.10
Number of days of state 1-hour exceedances (>20.0 ppm)[a]	0	0	0
Number of days of state 8-hour exceedances (>9.0 ppm)[a]	0	0	0
Nitrogen Dioxide, ppm - Worst Hour	0.070	0.050	0.053
Number of days of state exceedances (>0.25 ppm)	0	0	0
Particulate Matter <10 microns, maximum concentration in $\mu g/m^3$ (State/Fed)	54.4/54.0	119.1/119.4	248/245.5
Number of samples of state exceedances (>50 $\mu g/m^3$)	2	4	2
Number of samples of federal exceedances (>150 $\mu g/m^3$)	0	0	1
Particulate Matter <2.5 microns, maximum 24-hour average concentration in $\mu g/m^3$	35.2	29.8	39.9
Estimated number of days of federal 24-hour average exceedances (>65 $\mu g/m^3$)	0	0	0

Source: ARB, Air Quality Data Statistics; available at http://www.arb.ca.gov/adam/cgi-bin/db2www/adamtop4b.d2w/start
a Goleta-Fairview site results.

Ozone concentrations at the El Rio monitoring station exceeded the state standard only once during the 2005-2007 period and federal standards were not exceeded. Measured concentration samples of PM_{10} at El Rio exceeded state standards between 2 to 4 times per year from 2005-2007. Federal exceedances occurred once in the year 2007; 2005 and 2006 did not report any exceedances of the federal standard. Estimates were used due to a lack of samples. Ventura County is in attainment for the federal $PM_{2.5}$ standard. Neither carbon monoxide nor nitrogen dioxide at the El Rio station exceeded federal or state standards. Carbon monoxide concentrations at the Goleta-Fairview monitoring station did not exceed state or federal standards during the 2005-2007 period.

The major sources of ozone precursors in Ventura County are motor vehicles and other mobile equipment, solvent use, pesticide application, the petroleum industry, and electric utilities. The major sources of PM_{10} are road dust, construction, mobile sources, and farming operations. Locally, Santa Ana winds are responsible for entraining dust and occasionally causing elevated PM_{10} levels.

d. Air Quality Management Plan. The Federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of AQMPs and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to the ARB and the USEPA. The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

The USEPA designated Ventura County a moderate nonattainment area for the 8-hour ozone standard based on Ventura County's ozone levels over the previous three years in 2004. Moderate ozone nonattainment areas are required to obtain the federal 8-hour ozone standard by June 15, 2010. On February 14, 2008, ARB formally requested that the USEPA reclassify Ventura County to a serious 8-hour ozone nonattainment area. This means that Ventura County must meet the federal 8-hour ozone standard by June 15, 2013. VCAPCD has released a Final 2007 AQMP (May 2008), which presents new control measures intended to bring the County into compliance by that date.

The 2007 AQMP also presents the 2003 – 2005 Triennial Assessment and Plan Update required by the California Clean Air Act (CCAA). The goal of the CCAA is to achieve more stringent health-based state air quality standards at the earliest practicable date. Ventura County is designated a severe nonattainment area under the CCAA and must meet many of the most stringent requirements under this act.

While the Final 2007 AQMP contains some additional local control measures, most of the emissions reductions that Ventura County needs to attain the federal 8-hour ozone standard and continued progress to the state ozone standard will come from the ARB's 2007 SIP. This SIP contains comprehensive emission reduction programs that focus on reducing emissions from mobile sources, consumer products, and pesticides to significantly improve air quality. Based on photochemical modeling and the use of the local and state control measures, Ventura County is projected to attain the federal ozone standard by the required 2013 date.

e. Sensitive Receptors. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are therefore schools and hospitals. Sensitive receptors in the project vicinity include residents of the mobile home park to the west of the project site, seniors living at the assisted living community north of the site across Telegraph Road, and patients of the medical offices located across Wells Road to the east.

4.2.2 Impact Analysis

a. Methodology and Significance Thresholds. The analysis of the proposed Parklands Specific Plan's air quality impacts follows the guidance and methodologies recommended in the Ventura County air Quality Assessment Guidelines (October 2003). To calculate construction and operational emission estimates, URBEMIS 2007 (v.9.2.2) was used. Default assumptions were used to calculate construction, area, and operational emissions associated with the project, when project specific information was not available.

Projects and programs requiring an analysis of consistency with the AQMP include general plan updates and amendments, specific plans, area plans, large residential developments and large commercial/industrial developments. The consistency analysis evaluates the following questions:

- *Are the population projections used in the plan or project equal to or less than those used in the most recent AQMP for the same area?*
- *Is the rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area?*
- *Have all applicable land use and transportation control measures from the AQMP been included in the plan or project to the maximum extent feasible?*

If the answer to all of the above questions is yes, then the proposed project or plan is considered consistent with the AQMP. If the answer to any one of the questions is no, then Specific Plan buildout could potentially delay or preclude attainment of the state ozone standard. This would be considered inconsistent with the AQMP.

To analyze project generated emissions, the VCAPCD's *Air Quality Assessment Guidelines* recommends significance thresholds for projects proposed in Ventura County. Under these guidelines, projects that generate more than 25 lbs per day of ROG or NO_x are considered to individually and cumulatively jeopardize attainment of the federal ozone standard and thus have a significant adverse impact on air quality. The VCAPCD's 25 pounds per day thresholds for ROG and NOx does not apply to construction emissions since such emissions are temporary. For construction impacts, the VCAPCD recommends imposition of mitigation if emissions of either pollutant exceed 25 pounds per day. The VCAPCD also recommends minimizing fugitive dust through various dust control measures.

The VCAPCD has not established numeric thresholds for particulate matter. However, a project that may generate fugitive dust emissions in such quantities as to cause injury,

detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property is considered to have a significant air quality impact by the VCAPCD. This threshold is particularly applicable to the generation of fugitive dust during construction grading operations. As outlined in the VCAPCD's Guidelines for the Preparation of Air Quality Impact Analyses, the project's impact is considered significant if it would:

- *Generate daily emissions exceeding 25 lbs of reactive organic compounds (ROC/G) or nitrogen oxides (NOx);*
- *Cause an exceedance or making a substantial contribution to an exceedance of an ambient air quality standard;*
- *Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted AQMP;*
- *Be inconsistent with the Ventura County AQMP and emit greater than two lbs of ROC/G or NOx per day; or,*
- *Create a human health hazard by exposing sensitive receptors to toxic air emissions.*

Impacts relating to CO concentrations are considered significant if the additional CO from a project creates a "hot spot" where either the California one-hour standard of 20 parts per million (ppm) carbon monoxide or the federal and state eight hour standard of 9.0 ppm is exceeded.

b. Project Impacts and Mitigation Measures.

Impact AQ-1 Project construction would generate temporary air pollutant emissions of ozone precursors ROG and NOx, as well as fugitive dust (PM_{10}). However, implementation of standard dust and emission control conditions would reduce impacts to a less than significant level per the VCAPCD guidelines. Therefore, construction-related air quality impacts would be Class III, *less than significant*.

As discussed in Section 2.0, *Project Description*, buildout of the Parklands Specific Plan would include the development of a 66.7-acres site with predominantly residential uses. Construction activity and associated emissions of ozone precursors (ROG and NOx) and dust (PM_{10}) would occur periodically over the approximate three year construction time frame.

Construction under the specific plan would generate temporary air pollutant emissions due to the use of heavy construction equipment and potential generation of fugitive dust. An analysis was conducted assuming that project grading would be conducted during a period of six months, with cut and fill balanced and 17 active acres at one time would generate an estimated 182 lbs of fugitive dust per day. The modeling analysis assumed default construction equipment. Construction-related emissions are shown in Table 4.2-3.

The CARB has identified diesel exhaust particulate matter as a Toxic Air Contaminant (TAC). Diesel exhaust includes hundreds of different gaseous and particulate components, many of which are toxic. The grading equipment has the potential to expose sensitive populations in the

vicinity to elevated levels of diesel exhaust. As indicated by the URBEMIS modeling in Appendix B, PM_{10} and $PM_{2.5}$ emissions in diesel exhaust would be 2.88 and 2.65 pounds per day, respectively. Additionally, the VCAPCD determines construction impacts as temporary and insignificant and would therefore not contribute to operational emissions. Therefore, potential TACs emissions would be less than significant.

Table 4.2-3
Construction Emissions Estimates (lbs/day)

Phase	ROG	NO_x	PM_{10}
Grading	6.34	49.28	333.81
Building Construction	71.93	39.40	0.47

Source: URBEMIS 2007 v 9.2
Modeling results included in Appendix B.

Fugitive dust generated during grading can be reduced by approximately 46% by watering twice per day (SCAQMD). The VCAPCD does not classify construction impacts as significant because of their temporary nature. Although construction-related impacts are considered less than significant because of their temporary nature, if standard controls are implemented, impacts are less than significant. The following controls are found within Mitigation Measure AQ-3 of the 2005 City of Ventura General Plan FEIR.

In order to reduce impacts associated with ROC emissions (a precursor to ozone) the following measures shall be implemented:

- *Equipment engines should be maintained in good condition and in proper tune, as per manufacturer's specifications.*
- *During the smog season (May through October), the construction period should be lengthened so as to minimize the number of vehicles and equipment operating at the same time. The construction work day will be between the hours of 7 a.m. to 5 p.m.*
- *Construction activities should utilize new technologies to control ozone precursor emissions as they become available and feasible.*

During clearing, grading, earth moving, or excavation operation, excessive fugitive dust emissions shall be controlled by regular watering with reclaimed water, paving construction roads, or other dust preventive measures using the following procedures:

- *All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day and during grading and/or excavation activities.*

- *All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 20 mph averaged over one hour) so as to prevent excessive amounts of dust.*
- *All material transported offsite shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.*
- *Facemasks shall be used by all employees involved in grading or excavation operations during dry periods to reduce inhalation of dust, which may contain the fungus that causes San Joaquin Valley Fever.*
- *The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized so as to prevent excessive amounts of dust.*

After clearing, grading, earth moving, or excavation operations, and during construction activities, fugitive dust emissions shall be controlled using the following procedures:

- *All inactive portions of construction sites shall be seeded and watered until grass cover is grown.*
- *All active portions of construction sites shall be sufficiently watered to prevent excessive amounts of dust.*

At all times, fugitive dust emissions shall be controlled using the following procedures:

- *Construction site vehicle speeds shall be limited to 15-mph.*
- *All areas with vehicle traffic shall be watered periodically.*
- *Use of dust palliatives shall meet the road oil requirements of Ventura County APCD Rule 74.4, Cutback Asphalt.*
- *Streets adjacent to construction sites shall be swept as needed to remove silt, which may have accumulated from construction activities so as to prevent excessive amounts of dust.*

The standard conditions required by the City of Ventura mentioned above reduce construction related air quality impacts to less than significant.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact AQ-2 Operational emissions of ROG and NO_x would exceed VCAPCD thresholds. However, these impacts are mitigable with payment of Transportation Demand Management (TDM) fees. Therefore, the project would have a Class II, *significant but mitigable,* impact to regional air quality.

Worst-case daily emissions of ozone precursors ROG and NO_x were estimated based on the proposed uses of the project, as well as the estimated number of project-generated vehicle trips. Vehicle trips are discussed in detail in Section 4.13, *Transportation & Circulation.*

Vehicular and non-vehicular operational related impacts for 499 residential units, 11.5 acres of parks, 25,000 square feet of commercial and a 6,560 square foot community center were analyzed using URBEMIS 2007 v. 9.2.2 software. Emissions would be generated by both vehicular and non-vehicular sources. Non-vehicular sources, also termed area source emissions, include fuel combustion emissions from solvent use, reactive organic compounds from propellants, such as those contained within aerosol and non-aerosol consumer products, as well as emissions from mobile utility equipment such as lawn and garden equipment. Results of the URBEMIS 2007 v.9.2.2 modeling analysis are shown in Table 4.2-4 (modeling results are contained in Appendix B).

Table 4.2-4
Projected Daily Operational and Area Emissions

Project Component	Emissions (lbs/day)	
	ROG	NO_X
Stationary	33.30	5.64
Mobile	48.36	47.20
Total	81.66	52.84
Adjusted Total *	**66.42**	**49.72**
Threshold	*25*	*25*

Source: URBEMIS 2007 v.9.2.2 (see Appendix B).
** Adjusted total reflects daily emissions based on incorporation of URBEMIS "mitigation" (residential mix of uses, local-serving retail, residential transit service, residential bicycle/pedestrian friendliness, non-residential mix of uses, non-residential local-serving retail, non-residential transit service, and non-residential pedestrian/bicycle friendliness). These are project characteristics, and are already included in the existing environment, as well as enhanced with development under the Specific Plan as proposed.*

Project-related emissions (adjusted total) would exceed the 25 lbs/day VCAPCD significant threshold for ROC by about 41 lbs and exceed the 25 lbs/day NOx threshold by about 25 lbs. Thus, although growth accommodated under the specific plan is within the parameters considered in the 2005 General Plan EIR, impacts would be significant unless mitigation is incorporated.

The City's Air Quality Ordinance (Ordinance 93-37) requires developers of projects that generate emissions exceeding VCAPCD significance thresholds to pay air quality impact fees that are placed in an air quality mitigation fund that is used to offset project emissions through implementation of regional air quality programs. The fee is based on a formula developed by the VCAPCD and included in the District's Air Quality Assessment Guidelines (October 2003). Funds are used to implement such programs as enhanced public transit service, vanpool programs/subsidies, rideshare assistance programs, clean fuel programs, improved pedestrian and bicycle facilities, and park-and-ride facilities.

Mitigation Measures. The following mitigation measures would reduce air emissions associated with operation of the project.

AQ-2 (a) **Energy Efficiency.** The residential and commercial structures proposed for development under the Parklands Specific Plan shall be designed to increase energy efficiency 20% beyond Title 24 requirements to partially offset the operational emissions associated with daily operation of the proposed project following buildout. Proposed energy conservation measures shall be specified in individual building plans and shall be subject to review and approval by the Inspection Services Division.

AQ-2(b) **Air Quality Mitigation Fund.** The applicant shall contribute toward an air Quality Mitigation fund to be used to develop regional programs to offset air pollutant emissions associated with implementation of the Parklands Specific Plan. The total amount that would be contributed to this fund shall be calculated based upon the methodology described in Ordinance 93-37. Fees may be adjusted by the City over time if development totals or emission or cost factors change. The fund shall be used to finance City programs to reduce regional air pollutant emissions. Specific mitigation measures that could be undertaken using the fund include, but are not limited to, enhanced public transit service, vanpool programs/subsidies, rideshare assistance programs, clean fuel programs, improved pedestrian and bicycle facilities, and park-and-ride facilities.

Significance After Mitigation. Implementation of the recommended mitigation measures would reduce ROG and NO_x emissions associated with the operation of the Parklands Specific Plan development. Payment of TDM fees would mitigate the impacts to a less than significant level. Using the current inflation rate and methodologies described in Ordinance 93-37, the TDM fee estimate would be $102,220 for a 2010 completion year (see Appendix B).

Impact AQ-3 **Development under the specific plan would not result in LOS E or F at any study area intersections after mitigation. Therefore, impacts relating to CO hotspots would be Class III, *less than significant*.**

Areas with high vehicle density, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as CO hotspots. A CO hotspot analysis is required by the Ventura County Air Quality Assessment Guidelines (VCAPCD, 2003) if:

- *Indirect emissions are greater than the applicable ozone project significance thresholds (25 lbs per day NOx and ROG); and*
- *Roadway intersections currently operate at, or are expected to operate at, Levels of Service E, or F.*

As indicated in Table 4.2-4, operational NOx and ROG would exceed the VCAPCD ozone thresholds. However, project-level impacts to intersections in the vicinity would be minimal, as all intersections would operate at LOS C or better. With the addition of cumulative traffic (cumulative plus project scenario), the intersection of Darling Road/Wells Road would operate at LOS F. However, implementation of mitigation measure T-2(a-b) would require payment of

traffic impact fees and intersection improvements to add an eastbound left-turn lane, a second southbound left-turn lane, and a second westbound left-turn lane. With payment of fees and implementation of intersection improvements, the intersection of Darling Road and Wells Road would operate at LOS D, indicating that traffic volumes are not substantial enough to trigger a CO hotspot. Moreover, it should be noted that CO hotspots are most likely to occur where air circulation is hindered by topography or structures, such as at underpasses. The intersection of Darling Road/Wells Road includes two open fields to the east, a golf course, and a residential structure set back from the intersection. The openness of the intersection would allow for continual air flow and work against air stagnation. Therefore, the potential for adverse effects related to CO hotspots is less than significant.

Mitigation Measures. The impact related to CO hotspots is less than significant without mitigation. No mitigation is required.

Significance after Mitigation. The impact would remain less than significant without mitigation.

Impact AQ-4 The proposed project would not generate population growth beyond AQMP forecasts. Impacts relating to AQMP consistency would therefore be Class III, *less than significant*.

A significant impact to air quality would occur if the proposed project would conflict with or obstruct implementation of the Ventura County AQMP. Per the VCAQMD Assessment Guidelines, project consistency with the AQMP can be determined by comparing the actual population growth in the county with the projected growth rates used in the AQMP. Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. The population forecasts upon which the Ventura County AQMP is based are used to estimate future emissions and devise appropriate strategies to attain state and federal air quality standards. When population growth exceeds the forecasts upon which the AQMP is based, emission inventories could be surpassed, which could affect attainment of standards.

The Ventura County AQMP relies on the most recent population estimates developed by the Metropolitan Planning Organization (MPO). SCAG acts as the MPO for Ventura County. According to SCAG's 2008 Regional Transportation Plan (RTP) population forecasts, the projected 2010 population for the City of Ventura is 112,044. For the purposes of this analysis, it is presumed that the construction of 499 residential units would be completed in 2010. Based on the current average household size in the City (2.6 persons/ household), this number of units would generate 1,297 new residents. When added to the current population of 108,261 (California Department of Finance, 2008, this would bring the overall population to 109,558. This is well within the projected citywide population of 112,044 for 2010. Therefore, development of the 499 residences would not in itself generate population exceeding regional forecasts and would be consistent with the AQMP.

Mitigation Measures. None required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The Ventura County Air Basin is currently a non-attainment area for both the federal and state standards for ozone and the state standard for PM_{10}. Exceedance of air quality standards is the result of past and ongoing urban and rural development that has caused emissions to exceed the air basin's capacity for dispersal and removal of the air pollutants. However, the Ventura County AQMP predicts attainment of state and federal standards through imposition of various control mechanisms and, as discussed under Impact AQ-3, the proposed project is consistent with the AQMP. Consequently, although emissions associated with the vehicle trips generated by the Parklands Specific Plan (during worst-case events) exceed VCAPCD thresholds, this increase in emissions is not expected to delay attainment of air quality standards. Cumulative impacts would therefore be less than significant and the project's contribution to cumulative air quality impacts would not be cumulatively considerable.

d. Global Climate Change. Global climate change (GCC) is a change in the average weather of the earth that is measured by temperature, wind patterns, precipitation, and storms over a long period of time. The baseline by which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed an unprecedented acceleration in the rate of warming during the past 150 years.

GCC is a documented effect, with the degree to which the change is caused by anthropogenic (man-made) sources still under study. The increase in warming has coincided with the global Industrial Revolution, which has seen the widespread reduction of forests to accommodate urban centers and agriculture and the use of fossil fuels, primarily burning of coal, oil, and natural gas for energy. Per the United Nations Intergovernmental Panel on Climate Change (2007), the understanding of anthropogenic warming and cooling influences on climate has led to a very high confidence (90% or greater chance) that the global average net effect of human activities since 1750 has been one of warming. Most of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic GHG concentrations per the IPCC (November 2007). While there is some disagreement by individual scientists[1] with some of the findings of the IPCC, the overwhelming majority of scientists working on climate change agree with the main conclusions, as do the vast majority of major scientific societies and national academies of science. Disagreement within the scientific community is always present for all issues, however, the current state of knowledge is substantially in favor of GCC warming, with eleven of the last twelve years (1995-2006) ranking among the twelve warmest years in the instrumental record of global surface temperature since 1850 (IPCC, 2007). In addition, the majority of scientists agree that anthropogenic sources are a main, if not primary, contributor to the GCC warming.

<u>Greenhouse Gases (GHGs)</u>. Gases that trap heat in the atmosphere are often called greenhouse gases (GHG), analogous to the way in which a greenhouse retains heat. Common

[1] *A list of such scientists can be found at http://en.wikipedia.org/wiki/List_of_scientists_opposing_the_mainstream_scientific_assessment_of_global_warming*

GHG include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O_x), fluorinated gases, and ozone. GHG are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6), which are byproducts of certain industrial processes (Cal EPA, 2006b).

The accumulation of GHG in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHG, the earth's surface would be about 34° C cooler (CAT, 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. The following discusses the primary GHGs of concern.

Carbon Dioxide. The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO_2 are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes among these various reservoirs are roughly balanced (USEPA, April 2008). CO_2 was the first GHG demonstrated to be increasing in atmospheric concentration, with the first conclusive measurements being made in the last half of the 20th Century. Concentrations of CO_2 in the atmosphere have risen approximately 35% since the Industrial Revolution. Per the IPCC (2007), the global atmospheric concentration of carbon dioxide has increased from a pre-industrial value of about 280 parts per million (ppm) to 379 ppm in 2005. The atmospheric concentration of CO_2 in 2005 exceeds by far the natural range over the last 650,000 years (180 to 300 ppm) as determined from ice cores. The annual carbon dioxide concentration growth rate was larger during the last 10 years (1995–2005 average: 1.9 ppm per year), than it has been since the beginning of continuous direct atmospheric measurements (1960–2005 average: 1.4 ppm per year) although there is year-to-year variability in growth rates.

Methane. Methane (CH_4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to some other GHGs. It is approximately 20 times more effective at trapping heat in the atmosphere than CO_2 (global warming potential [GWP] 20x that of CO_2). Over the last two hundred and fifty years, the concentration of CH_4 in the atmosphere increased by 148% (IPCC 2007). Anthropogenic sources of CH_4 include landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (USEPA, April 2008).

Nitrous Oxide. Concentrations of nitrous oxide (N_2O) also began to rise at the beginning of the industrial revolution. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizers that contain nitrogen. Use of these fertilizers has increased over the last century. Its GWP is 300x that of CO_2.

Flourinated Gases (HFCS, PFCS and SF_6). Flourinated gases, such as hydroflourocarbons (HFCs), perflourocarbons (PFCs) and sulfurhexafluoride (SF_6), are powerful greenhouse gases that are emitted from a variety of industrial processes. Flourinated gases are used as substitutes for

ozone-depleting substances such as chloroflourocarbons (CFCs), hydrochloroflourocarbons (HCFCs), and halons, which have been regulated since the mid-1980s because of their ozone destroying potential and are phased out under the *Montreal Protocol* and Clean Air Act Amendments of 1990. Flourinated gases are typically emitted in smaller quantities than CO_2, CH_4, and N_2O, but each molecule can have a much greater global warming effect. SF_6 is the most potent greenhouse gas the IPCC has evaluated.

Greenhouse Gas Inventory. Worldwide anthropogenic emissions of GHG were approximately 40,000 million metric tons of carbon dioxide equivalent (CDE[2]), including ongoing emissions from industrial and agricultural sources, but excluding emissions from land use changes (ie: deforestation, biomass decay) (IPCC, 2007). CO_2 emissions from fossil fuel use accounts for 56.6% of the total emissions of 49,000 million metric tons CDE (includes land use changes) and all CO_2 emissions are 76.7% of the total. Methane emissions account for 14.3% and N_2O emissions for 7.9% (IPCC, 2007).

Total U.S. greenhouse gas emissions in 2006 were 7,054 million metric tons CDE (USEPA, April 2008), or about 14% of total GHG emissions. Overall, total U.S. emissions have risen by 14.7 percent from 1990 to 2006, while emissions fell from 2005 to 2006, decreasing by 1.1% (75.7 MMT CDE). The following factors were primary contributors to this decrease: (1) compared to 2005, 2006 had warmer winter conditions, which decreased consumption of heating fuels, as well as cooler summer conditions, which reduced demand for electricity, (2) restraint on fuel consumption caused by rising fuel prices, primarily in the transportation sector and (3) increased use of natural gas and renewables in the electric power sector.

The primary GHG emitted by human activities in the United States was CO_2, representing approximately 84.8% of total GHG emissions (USEPA, April 2008). The largest source of CO_2, and of overall greenhouse gas emissions, was fossil fuel combustion. CH_4 emissions, which have declined from 1990 levels, resulted primarily from enteric fermentation associated with domestic livestock, decomposition of wastes in landfills, and natural gas systems. Agricultural soil management and mobile source fossil fuel combustion were the major sources of N_2O emissions. The emissions of substitutes for ozone depleting substances and emissions of HFC-23 during the production of HCFC-22 were the primary contributors to aggregate HFC emissions. Electrical transmission and distribution systems accounted for most SF_6 emissions, while PFC emissions resulted from semiconductor manufacturing and as a by-product of primary aluminum production.

The residential and commercial end-use sectors accounted for 20 and 18 percent, respectively, of CO_2 emissions from fossil fuel combustion in 2006 (USEPA, April 2008). Both sectors relied heavily on electricity for meeting energy demands, with 72 and 79 percent, respectively, of their emissions attributable to electricity consumption for lighting, heating, cooling, and operating appliances. The remaining emissions were due to the consumption of natural gas and petroleum for heating and cooking.

California is a substantial contributor of global GHGs as it is the second largest contributor in the United States and the sixteenth largest in the world (AEP, 2007). Based upon the 2004 GHG

[2] *Carbon dioxide equivalent (CDE or CO_2E) is a quantity that describes, for a given mixture and amount of GHGs, the amount of CO_2 (usually in metric tons; million metric tons [megatonne] = $MMTCO_2E$ = terragram [Tg] CO_2 Eq; 1,000 MMT = gigatonne) that would have the same global warming potential (GWP) when measured over a specified timescale (generally, 100 years).*

inventory data (the latest year available) compiled by the California Energy Commission (CEC, December 2006), California produced 492 MMT CDE (7% of US total). The major source of GHG in California is transportation, contributing 41% of the state's total GHG emissions. Electricity generation is the second largest source, contributing 22% of the state's GHG emissions (CEC, December 2006). Most, 81%, of California's 2004 GHG emissions (in terms of CDE) were carbon dioxide produced from fossil fuel combustion, with 2.8% from other sources of CO_2, 5.7% from methane, and 6.8% from nitrous oxide (CEC, December 2006). California emissions are due in part to its large size and large population. By contrast, California in 2001 had the fourth lowest CO_2 emissions per capita from fossil fuel combustion in the country, due to the success of its energy-efficiency and renewable energy programs and commitments that have lowered the state's GHG emissions rate of growth by more than half of what it would have been otherwise (CEC, December 2006). Another factor that has reduced California's fuel use and GHG emissions is its mild climate compared to that of many other states.

Effects of Global Climate Change. GCC has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that global warming could be taking place, including substantial ice loss in the Arctic (IPCC, 2007).

According to ARB, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (ARB 2006c, 2007c). Below is a summary of some of the potential effects reported by an array of studies that could be experienced in California as a result of global warming and climate change:

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (CEC, February 2006).

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." (Climate Change and California Water Resources). For example, some studies identify little change in total annual precipitation in projections for California (California Climate Change Center, 2006). Other studies show significantly more precipitation (Climate Change and California Water Resources [(DWR 2006)]). Even assuming that climate change leads to long-term increases in precipitation,

analysis of the impact of climate change is further complicated by the fact that no studies have identified or quantified the runoff impacts such an increase in precipitation would have in particular watersheds (California Climate Change Center, 2006)). Also, little is known about how groundwater recharge and water quality will be affected (Id.). Higher rainfall could lead to greater groundwater recharge, although reductions in spring runoff and higher evapotranspiration could reduce the amount of water available for recharge (Ibid.).

The California Department of Water Resources (DWR 2006) report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta concludes that "[c]climate change will likely have a significant effect on California's future water resources . . . [and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain" (DWR, 2006).

This uncertainty serves to complicate the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood (DWR, 2006). DWR adds that "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows (Kiparsky 2003; DWR 2005; Cayan 2006, Cayan, D., et al, 2006).

Hydrology. As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of sea water as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality (CCCC, 2006).

Ecosystems and Wildlife. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise as discussed previously: 1.0-4.5°F (0.6-2.5°C) in the next fifty years, and 2.2-10°F (1.4-5.8°C) in the next century, with significant regional variation (EPA 2000). Soil moisture is likely to decline in many regions, and intense rainstorms

are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage (Parmesan, C. and H. Galbraith 2004.)

Regulatory Setting.

International and Federal. The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change (UNFCCC) since is was signed on March 21, 1994. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. It has been estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008–2012. It should be noted that although the United States is a signatory to the Kyoto Protocol, Congress has not ratified the Protocol and the United States has not bound itself to the Protocol's commitments (UNFCCC, 2007)

The United States is currently using a voluntary and incentive-based approach toward emissions reductions in lieu of the Kyoto Protocol's mandatory framework. The Climate Change Technology Program (CCTP) is a multi-agency research and development coordination effort (which is led by the Secretaries of Energy and Commerce) that is charged with carrying out the President's National Climate Change Technology Initiative (CCTP, December 2007; http://www.epa.gov/climatechange/policy/cctp.html).

To date, the USEPA has not regulated GHGs under the Clean Air Act, however, the U.S. Supreme Court in *Massachusetts v. EPA* (April 2, 2007) held that the USEPA can, and should, consider regulating motor-vehicle GHG emissions. The USEPA has not yet promulgated federal regulations limiting GHG emissions. The USEPA in December 2007 also denied California's request for a waiver to directly limit GHG tailpipe emissions, which prompted a suit by California in January 2008 to overturn that decision.

California Regulations. Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State was signed into law in September 2002 by Governor Gray Davis. Governor Schwarzenegger issued Executive Order S-3-05 in 2005 that established statewide GHG emissions reduction targets. S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels (CalEPA 2006a).

Governor Schwarzenegger signed AB 32, the "California Global Warming Solutions Act of 2006," into law in the fall of 2006. AB 32 requires the California Air Resources Board (ARB) to adopt regulations by January 1, 2008 to require reporting and verification of statewide GHG emissions. ARB is to produce a plan by January 1, 2009, to indicate how emission reductions will be achieved from significant GHG sources via regulations, market mechanisms, and other actions. In addition, this law requires ARB to adopt regulations by January 1, 2010, to implement the early action GHG emission reduction measures that can be implemented before the adoption of those recommended

by the 2009 plan. The bill requires achievement by 2020 of a statewide GHG emissions limit equivalent to 1990 emissions (essentially a 25% reduction below 2005 emission levels; same requirement as under S-3-05), and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an important environmental issue that requires analysis under CEQA. This bill directs the California Office of Planning and Research to prepare, develop, and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, by July 1, 2009. The Resources Agency is required to certify or adopt those guidelines by January 1, 2010.

Executive Order S-01-07 was enacted by Governor Schwarzenegger on January 18, 2007. The order mandates that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In addition, a Low Carbon Fuel Standard ("LCFS") for transportation fuels is to be established for California.

In response EO S-3-05, the CalEPA created the Climate Action Team (CAT), which, in March 2006, published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, landfill methane capture, etc.

The ARB in response to the requirements of AB-32 produced a list of 37 early actions for reducing GHG emissions in June 2007. ARB expanded this list in October 2007 to 44 measures that have the potential to reduce GHG emissions by at least 42 million metric tons of CO_2 emissions by 2020, representing about 25% of the estimated reductions needed by 2020 (ARB, October 2007). ARB staff is working on 1990 and 2020 GHG emission inventories in order to refine the projected reductions needed by 2020. After completing a comprehensive review and update process, the ARB has approved a 1990 statewide GHG level and 2020 limit of 427 MMT CDE.

For more information on the Assembly Bills and Executive Orders identified above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and http://www.arb.ca.gov/cc/cc.htm.

Local Regulations and CEQA Requirements. GHG emissions contributing to global climate change have only recently been addressed in CEQA documents, such that CEQA and case law do not provide guidance relative to their assessment. Quantitative significance thresholds for this topic have not been adopted by the State of California, or any particular air pollution control district, including the VCAPCD. The Office of Planning and Research (OPR) is directed under Senate Bill 97, to prepare, develop, and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions through CEQA by July 1, 2009. Those guidelines may recommend thresholds, but no adopted thresholds are available at this time. In the interim, the OPR has recently completed a Technical Advisory

(June 2008) for addressing climate change in CEQA documents to guide the structure of climate change analysis.

Climate Change Impact Analysis. The information provided in this section is based on recently established California goals for reducing greenhouse gas (GHG) emissions as well as a project-specific emissions inventory developed for the proposed project. Determining how a proposed project might contribute to climate change, and what the overall effect of an individual project would be based on that contribution is still undergoing debate at this time. As previously discussed, no approved thresholds or methodologies are currently available for determining the significance of a project's potential cumulative contribution to global climate change in CEQA documents. An individual project (unless it is a massive construction project, such as a dam or a new freeway project, or a large fossil-fueled fired power plant) does not generate sufficient GHG emissions to directly influence global climate change; therefore, the issue of global climate change typically involves an analysis of whether a project's contribution towards a cumulative impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The following is a good faith effort at disclosing the nature of the project's potential effect with regard to GHG emissions, and suggest measures as appropriate to reduce potential GHG emissions.

Methodology. This analysis is based on the methodologies recommended by the California Air Pollution Control Officers Association [CAPCOA] (January 2008) CEQA and Climate Change white paper and the Technological Advisory produced by the OPR, entitled CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review. The OPR Technological Advisory provides the overarching structure of climate change discussions, while the CAPCOA document provides the technological methodologies to assess GHG emissions.

The OPR Technical Advisory is a guidance document developed in cooperation with the Resources Agency, the California Environmental Protection Agency (Cal/EPA), and the California Air Resources Board (ARB). The document recommends an approach for agencies to analyze GHG emissions for projects. It recommends three basic steps: (1) identify and quantify the GHG emissions; (2) assess the significance of the impact on climate change; and (3) if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.

CAPCOA conducted an analysis of various approaches and significance thresholds, ranging from a zero threshold (all projects are cumulatively considerable) to a high of 40,000 – 50,000 metric tons CDE per year. For example, assuming a zero threshold and the AB 32 2020 targets, this approach would require all discretionary projects to achieve a 33% reduction from projected "business-as-usual" emissions to be considered less than significant. Another method based on a market capture approach that requires mitigation for greater than 90% of likely future discretionary development would use a quantitative threshold of greater than 900 metric tons CDE/year for most projects, which would generally correspond to residential projects of 50 units, office projects of approximately 35,000 square feet, retail projects of approximately 11,000 square feet, or supermarket space of approximately 6,300 square feet. Another potential threshold of 10,000 metric tons was considered by the Market Advisory Committee for inclusion in a Greenhouse Gas Cap

and Trade System in California. A 10,000 metric ton significance threshold would correspond to the GHG emissions of approximately 550 residential units, 400,000 square feet of office space, 120,000 square feet of retail, and 70,000 square feet of supermarket space (CAPCOA, January 2008). This threshold would capture roughly half of new residential or commercial development (CAPCOA, January 2008). The basic concepts for the various approaches suggested by CAPCOA are used herein to determine whether or not the proposed project's GHG emissions are "cumulatively considerable."

Calculations of carbon dioxide, methane, and nitrous oxide are provided for full disclosure of the magnitude of potential project effects. The analysis focuses on carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) as these are those GHG emissions that the project would emit in the largest quantities as compared to other GHGs (such as chlorofluorocarbons [CFCs]). Calculations were based on the methodologies discussed in the CAPCOA white paper (January 2008) and included the use of the California Climate Action Registry General Reporting Protocol (March 2007).

Indirect Emissions. Operational emissions of CO_2 associated with space heating and landscape maintenance were quantified using the California Air Resource Board's URBEMIS 2007 (version 9.2.2) computer model. N_2O and CH_4 emissions were quantified using the California Climate Action Registry General Reporting Protocol (March 2007) indirect emissions factors for electricity use (see Appendix for calculations). The calculations and emission factors contained in the General Reporting Protocol were selected based on technical advice provided to the Registry by the California Energy Commission. This methodology is considered to be reasonable and reliable for use as it has been subjected to peer review by numerous public and private stakeholders and in particular by the California Energy Commission, and is recommended by CAPCOA (January 2008).

Direct Emissions from Mobile Combustion. Emissions of CO_2 from transportation sources were quantified using the California Air Resource Board's URBEMIS 2007 (version 9.2.2) computer model. N_2O and CH_4 emissions were quantified using the California Climate Action Registry General Reporting Protocol (March 2007) direct emissions factors for mobile combustion (see Appendix for calculations). Total daily mileage was calculated in URBEMIS 2007 and extrapolated to derive total annual mileage. Emission rates were based on the vehicle mix output generated by URBEMIS and the emission factors found in the California Climate Action Registry General Reporting Protocol.

It should be noted that one of the limitations to a quantitative analysis is that emission models such as URBEMIS evaluate aggregate emissions and do not demonstrate, with respect to a global impact, how much of these emissions are "new" emissions specifically attributable to the proposed project in question. For most projects, the main contribution of GHG emissions is from motor vehicles and the total vehicle miles traveled (VMT), but the quantity of these emissions appropriately characterized as "new" is uncertain. With respect to a specific plan project, existing traffic is generated by the present uses, traffic to the retail component of the specific plan can be comprised of diverted trips from other retail stores (and depending on location, either result in an increase or decrease in VMT), pass-by trips (where the store is en route to another primary location), or an additional, fully new trip associated with consumer choice to travel to the store in addition to other retail stores. In addition, the traffic associated with the residential portion of the project may be relocated trips from other locales, and consequentially, may result in either higher or lower net VMT. In this instance, it is likely that some of the proposed project-related GHG emissions associated with traffic and energy demand would be truly "new" emissions; but, it is also likely

that some of the emissions represent diversion of emissions from other locations. Thus, although GHG emissions are associated with the project, it is not possible to discern how much diversion is occurring or what fraction of those emissions represent global increases. In the absence of information regarding the different types of trips, the VMT generated by URBEMIS is used as a reasonable and probably conservative estimate.

Estimate of GHG Emissions.

Operational Indirect and Stationary Direct Emissions. Buildout of the Parklands Specific Plan could generate demand for up to 782,417 kilowatt-hours [kWh] of electricity per year (see Table 4.2-5). The generation of electricity through combustion of fossil fuels typically yields carbon dioxide, and to a smaller extent nitrous oxide and methane. As discussed above, annual electricity emission can be calculated using the California Climate Action Registry General Reporting Protocol, which has developed emission factors based on the mix of fossil-fueled generation plants, hydroelectric power generation, nuclear power generation, and alternative energy sources associated with the regional grid. Carbon dioxide emission estimates using the URBEMIS model also take into account emissions from other operational sources such as natural gas use for space heating. Table 4.2-6 shows the estimated operational emissions of GHGs from the proposed Specific Plan.

Table 4.2-5
Estimated Electricity Demand

Type of Use	Units	Electricity Demand Factor	Annual Electricity Demand (kWH/Year)
Commercial/Retail[1]	31,560 sf	15.7 kWH/unit/year [2]	495,492
Residences	499	575 kWH/unit/year [3]	286,925
Total			***782,417***

sf = square feet kWH = kilowatt hour
[1] Commercial/Retail Land Use includes the Community Center due to its similar electricity needs and hours.
[2] Demand factor from Michael Brandman Associates, 2007, Panama Lane Shopping Center EIR, page 7-22
[3] CEC, 2007. California's Residential Electricity Consumption, Prices, And Bills, 1980-2005

Table 4.2-6
Estimated Annual Operational Emissions of GHG

Emission Source	Annual Emissions	
	Emissions	**CDE (metric tons)**
Carbon Dioxide (CO_2)[1]	1359.46 short tons	1,233.2
Methane (CH_4)	0.0024 metric tons	0.0 [2]
Nitrous Oxide (N_20)	0.0013 metric tons	0.4
Project Total		**1,233.6**

Source: California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.0, April 2008, page 30-35.
[1] Includes indirect energy from electrical and area source emissions from natural gas and heating. See Appendix for GHG emission factor assumptions.
[2] Total is minimal amounts, less than 0.1 metric tons.

Transportation Emissions. Mobile source GHG emissions were estimated using the average daily trips estimate generated by the project traffic report and the total vehicle miles traveled estimated in URBEMIS 2007 (v. 9.2.2). The URBEMIS 2007 model estimates that approximately 41,451 daily VMT are associated with the project. Table 4.2-7 shows the estimated mobile emissions of GHGs based on this VMT estimate.

Table 4.2-7
Estimated Annual Mobile Emissions of Greenhouse Gases

	Annual Emissions	
Emission Source	**Emissions**	**CDE (metric tons)**
Carbon Dioxide (CO_2)[1]	6,932.5 tons (short, US)	6,289
Methane (CH_4) [2]	6.3 metric tons	132
Nitrous Oxide (N_2O) [2]	7.0 metric tons	2,161
	Project Total	**8,582**

Source:
[1] Mobile Emissions from URBEMIS 2007 (version 9.2.2).
[2] California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.0, April 2008, page 30-35.
See Appendix B for GHG emission factor assumptions.

Combined Stationary and Mobile Source Emissions. Table 4.2-8 combines the operational and mobile GHG emissions associated with the proposed project, which total approximately 9,805.6 metric tons per year in carbon dioxide equivalency units. This total represents roughly 0.0020% of California's total 2004 emissions of 492 million metric tons. These emission projections indicate the majority of the project GHG emissions are associated with vehicular travel (90%). Please note that as discussed above, that the mobile emissions are in part a redirection of existing travel to other locations, and so already a part of the total California GHG emissions.

Table 4.2-8
Combined Annual Emissions of Greenhouse Gases

Emission Source	CDE (metric tons/year)
Operational	1,224
Mobile	8,582
Project Total	**9,806**

Sources: Operational Emissions from URBEMIS 2007 (version 9.2.2).; California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.0, April 2008.

GHG Cumulative Significance. CAPCOA (January 2008) provided several approaches to consider potential cumulative significance of projects with respect to GHGs. A zero threshold approach can be considered based on the concept that climate change is a global phenomenon in that all GHG emissions generated throughout the earth contribute to it, and not controlling small

source emissions would potentially neglect a major portion of the GHG inventory. However, the *CEQA Guidelines* also recognize that there may be a point where a project's contribution, although above zero, would not be a considerable contribution to the cumulative impact. Therefore, a threshold of greater than zero is considered more appropriate in this air quality analysis. Based on the information provided in the CAPCOA white paper for the various emissions scenario thresholds considered, the proposed project's contribution of about 9,806 metric tons CDE/year would be considered a considerable contribution for 2 out of 5 of the scenario thresholds under the non-zero threshold approach. The thresholds it exceeds would be Threshold 2.2, which indicates a 900 tons/year level and the other (Threshold 2.5) does not include a numerical threshold but applies to residential development above 50 units and 50,000 square feet. The project does not exceed the other three non-zero thresholds (ranging from 10,000 – 40,000 megatons CDE or greater). Based on this analysis, the development facilitated by the proposed Specific Plan would not exceed three out of the five potential thresholds, therefore, the project would not be considered cumulatively considerable.

The Climate Action Team, established by Executive Order S-3-05 has recommended strategies to reduce GHG emissions at a statewide level to meet the goals of the Executive Order (Table 5-5; http://www.climatechange.ca.gov/ climate_action_team/index.html). Several of these actions are already required by California regulations. Project consistency with the Climate Action Team Strategies are discussed in Table 4.2-9.

Table 4.2-9
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Air Resources Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB in September 2004.	**Consistent** The vehicles that travel to and from the project site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase.
Diesel Anti-Idling The ARB adopted a measure to limit diesel-fueled commercial motor vehicle idling in July 2004.	**Consistent** Current State law restricts diesel truck idling to five minutes or less. Diesel trucks operating from, and making deliveries to, the project site are subject to this state-wide law. Construction vehicles are also subject to this regulation.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	**Consistent** This strategy applies to consumer products. All applicable products would comply with the regulations that are in effect at the time of manufacture.
Alternative Fuels: Biodiesel Blends	**Consistent**

Table 4.2-9
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	The diesel vehicles that travel to and from the project site on public roadways could utilize this fuel once it is commercially available.
Alternative Fuels: Ethanol Increased use of E-85 fuel.	**Consistent** Employees and residents of the project site could choose to purchase flex-fuel vehicles and utilize this fuel once it is commercially available in the region and local vicinity.
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy duty vehicles and an education program for the heavy duty vehicle sector.	**Consistent** The heavy-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Achieve 50% Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	**Consistent** The City of Ventura is required to achieve the 50% Statewide Recycling Goal. It is anticipated that the project would similarly divert at least 50 percent of its solid waste after the recyclable content is diverted. The project will be conditioned to provide recycling bins to promote recycling of paper, metal, glass, and other recyclable material.
Zero Waste – High Recycling Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	**Consistent** It is anticipated that the project would similarly divert at least 50 percent of its solid waste after the recyclable content is diverted. The project will be conditioned to provide recycling bins to promote recycling for both residential and commercial/retail components. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Department of Forestry	
Urban Forestry A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Consistent** The landscaping proposed for the project would include a natural preserve of Brown Barranca in addition to a street tree plan. The Specific Plan proposes tree types for each street included in the Specific Plan.
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	**Consistent** The project proposes to provide drought-tolerant, low water consumption plant varieties throughout the property.

Table 4.2-9
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	**Consistent** The project will need to comply with the standards of Title 24 that are in effect at the time of development. In addition if adopted, Mitigation Measure AQ-1 requires an increase in efficiency to 20% more than Title 24.
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	**Consistent** Under State law, appliances that are purchased for the project - both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation established a statewide program to encourage the production and use of more efficient tires.	**Consistent** Residents of the Project site could purchase tires for their vehicles that comply with state programs for increased fuel efficiency.
Municipal Utility Energy Efficiency Programs/Demand Response Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.	*Not applicable*, but the project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Renewable Portfolio Standard California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.	*Not applicable*, but the project would not preclude the implementation of this strategy by Southern California Edison.
Municipal Utility Combined Heat and Power Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of on-site power production to meet both heat and electricity loads.	*Not applicable* since this strategy addresses incentives that could be provided by utility providers such as Southern California Edison and The Gas Company. In addition, the commercial facility at the site are too small for efficient combined heat and power production.
Alternative Fuels: Non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	**Consistent** Residents of the project site could purchase alternative fuel vehicles and utilize these fuels once they are commercially available in the region and local vicinity.
Business, Transportation and Housing	
Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information	**Consistent** The proposed project is an urban infill development; the proposed land uses would have readily available access to SR 126, which

Table 4.2-9
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
that advance cleaner transportation and reduce climate change emissions.	could reduce the lengths of regional vehicle trips. Additionally, the project promotes walkability and bicycling as a mode of transportation and participates in the CIDS improvements of the Wells Saticoy Community.
Smart Land Use and Intelligent Transportation Systems (ITS) Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. The Governor is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	**Consistent** The Specific Plan locates new residences in a relatively close proximity to commercial areas within the Wells Saticoy Community. The project also proposes a mix of residential and retail uses including some live-work opportunities that would cut down on vehicular trips. The project site would have readily available access to SR 126, thereby improving the efficiency of goods movement.
State and Consumer Services Agency	
Green Buildings Initiative Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and -leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	**Consistent** As discussed previously, the project is required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. The 2005 Title 24 standards are approximately 8.5 percent more efficient than those of the 2001 standards. In addition if adopted, Mitigation Measure AQ-1 requires an increase in efficiency to 20% more than Title 24.
Public Utilities Commission (PUC)	
Accelerated Renewable Portfolio Standard The Governor has set a goal of achieving 33 percent renewable in the State's resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	*Not applicable*, but the project would not preclude the implementation of this strategy by energy providers.

Table 4.2-9
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Solar Initiative The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasing demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	**Consistent** Although solar roofs are not proposed as part of the project, it is recommended that the Developer consider the installation and use of solar equipment.

The proposed Specific Plan would be consistent with the measures indicated in the 2006 CAT Report. Consistency with this report illustrates that the project would coincide with the State's greenhouse legislations and would not contribute to its inability to meet said goals.

It is noted that the proposed specific plan would be required to increase energy efficiency by 20% beyond Title 24 requirements pursuant to Mitigation Measure AQ-2(a). In addition, the proposed project includes potential for live/work development and mixed use development in the Urban General Corridor, which would contribute to reductions in VMT, thereby further reducing GHG emissions. Moreover, improvements to Telegraph Road and Wells Road to reduce future vehicle lanes from four to two and increase pedestrian and bike connectivity through development of a 24-foot wide parkway along the north side of Telegraph Road, landscaped medians on both Telegraph Road and Wells Road, Class I bike path extension through the plan area and Class II bike lanes along Wells Road and Telegraph Road will contribute towards reducing VMT by creating an environment that facilitates walking and bicycling. These improvements are not quantifiable, but could have beneficial effects on surrounding existing residential and commercial development if people are more likely to walk or bike to nearby commercial uses along Wells Road rather than driving. Lastly, the applicant's payment of fees to a transportation demand management fund per mitigation measure AQ-2(b) would fund areawide improvements to reduce VMT such as enhanced public transit service, vanpool programs/subsidies, rideshare assistance programs, clean fuel programs, improved pedestrian and bicycle facilities, and park-and-ride facilities and/or rideshare programs. With implementation of these features and mitigation measures, the project's effects on global climate change are further reduced. Therefore the proposed specific plan does not have cumulatively considerable effects in regards to GHG emissions.

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4.3 BIOLOGICAL RESOURCES

This section evaluates potential impacts to biological resources within the Parklands specific plan area (plan area). Both direct and indirect impacts to biological resources are discussed.

4.3.1 Setting

The plan area is relatively level and is located in the western portion of the Santa Clara River Valley located at the southwest corner of Telegraph Road and Wells Road. The plan area is currently and has historically been used for the agricultural production of row crops. Brown Barranca is an intermittent drainage located in the northeast portion of the plan area. About 1,660 linear feet of the Brown Barranca are situated within the plan area. Within the plan area, the barranca supports native riparian vegetation, though about 290 linear feet of this reach has been fortified on the north bank with concreted rock rip-rap where the Barranca then drains into a concrete box culvert beneath Blackburn Road. Downstream of the plan area, Brown Barranca is channelized into a concrete trapezoidal channel. Brown Barranca originates from Long Canyon, a 1,000-acre (approximate) sub-watershed that drains the south facing slopes of Sulphur Mountain above Ventura. Approximately one mile downstream of the plan area, Brown Barranca drains into the Santa Clara River, which then drains to the Pacific Ocean.

A field survey of the plan area was conducted on November 8, 2005 to document the biological resources by Padre Associates, Inc. Padre Associates worked with the applicant, EIR consultants, and staff producing several revisions to the report, which were finalized in April 2007. The full text of this report is contained in Appendix C (Padre Associates, Inc. April 2007). Due to the majority of the plan area being agricultural use, biological field surveys focused specifically on Brown Barranca. Field work for the wetland delineation was conducted on November 16, 2005 (Padre Associates, Inc. 2007). Other site visits relative to biological investigations were performed by Rincon Consultants, Inc. as part of the EIR. These included visits by biologists on the following dates:

1) *May 26, 2006, site visit to field verify information provided in the Padre Biological Investigation.*
2) *May 23, 2008, Breeding Bird Survey (Report included in Appendix C)*
3) *June 16, 2008, general site reconnaissance to verify that onsite conditions have not substantially changed since the preparation of the Padre Associates, Inc. Biology Impact Study (memo included in Appendix C).*
4) *July 28, 2008, day and night habitat assessment and California red legged frog (CRLF) surveys (see report Appendix C).*
5) *July 29, 2008, CRLF report aerial photo ground truthing via driving surrounding public streets (see report Appendix C).*
6) *August 4, 2008, day and night habitat assessment and California red legged frog surveys (see report Appendix C).*

a. Vegetation. The majority of the specific plan area supports agricultural crops and does not support native vegetation. However, portions adjacent to and within Brown Barranca support native riparian vegetation, which is mainly composed of a dense overstory dominated by arroyo willow (*Salix lasiolepis*) and an understory populated with poison oak (*Toxicodendron diversilobum*), broad-leaved cattail (*Typha latifolia*), mulefat (*Baccharis salicifolia*), willow weed

(*Polygonum lapathifolium*), and big saltbrush (*Atriplex lentiformis*). Riparian vegetation with the plan area is an isolated fragments as Brown Barranca has been converted to a linear park with eucalyptus plantings north of Telegraph Road, and is a concrete-lined culvert downstream of Blackburn Road.

Special Status Plant Species. Special-status plant species are either listed as endangered or threatened under the Federal or California Endangered Species Acts, or rare under the California Native Plant Protection Act, or considered to be rare by resource agencies, professional organizations, and the scientific community. A literature search and field surveys conducted as part of the Padre Associates, Inc (2007) study indicated that 5 special status plant species have the potential to occur within the plan area. Each of them have been designated as List 4 by CNPS, meaning they have a limited distribution, but are not rare or declining. These special status plant species are listed in Table 4.3-1.

Table 4.3-1
Special Status Plant Species with Potential to Occur in the Plan Area

Common Name (Scientific Name)	Status	Occurrence within the Plan Area
Plummer's baccharis (*Baccharis plummerae ssp. Plummerae*)	List 4	Not found during field surveys
round leaved boykinia (*Boykinia rotundifolia*)	List 4	Not found during field surveys
ocellated Humboldt lily (*Lillium humboldtii ssp. ocellatum*)	List 4	Not found during field surveys
Fish's milkwort (*polygala cornuta var. fishiae*)	List 4	Not found during field surveys
southern California black walnut (*Juglans californica var. californica*)	List 4	Present within Brown Barranca

Source: Table 2, Padre Associates Inc. April 2007 – see Appendix C.

The only one of these plants identified within the plan area during biological site visits is the southern California black walnut (*Juglans californica var. californica*).

b. Wildlife. Wildlife and wildlife habitat was examined as part of the Biological Study completed by Padre Associates, Inc (2007), and verified by Rincon Consultants, Inc. Wildlife habitat was concentrated around Brown Barranca due to the rest of the site including agricultural land uses. The riparian corridor of Brown Barranca may be considered suitable foraging habitat for riparian-dependent wildlife species. However, many riparian-dependent species require upland foraging areas adjacent to riparian nesting areas, which is absent from the plan area. The dense willow overstory throughout the Barranca may provide nesting locations, refuge, and suitable foraging habitats for birds, mammals, reptiles, and amphibians. Fish species are unlikely due to the intermittent nature of the Barranca and were not observed during field visits (Padre Associates Inc. 2007; Rincon Consultants Inc. 2008). However, mosquito fish may occur as a result of planting for mosquito control. Wildlife species that were identified as occurring within the plan area during field visits included raccoon, black rat, gray

fox, domestic cat, coyote, striped skunk, and dusky footed-wood rat. A total of 38 species of birds were noted in the plan area during a spring breeding survey (Rincon Consultants, May 2008). No reptiles or fish were observed within the plan area during previous biological investigations (Padre and Associates, 2007, Rincon Consultants, Inc. 2007; however, African clawed frogs were observed in ponded areas of the barranca during night surveys (Rincon Consultants, July 2008).

Special Status Wildlife. A total of 25 special status wildlife species are documented as having the potential to occur within the plan area (Padre Associates Inc., 2007; Rincon Consultants Inc., May 2008), three of which were documented onsite during a subsequent nesting bird survey. Table 4.3-2 identifies these species and the likelihood of occurrence.

Table 4.3-2
Special Status Wildlife Species with Potential to Occur in the Plan Area

Common Name (Scientific Name)	Status	Occurrence within the Plan Area
Fish		
southern steelhead (*Oncorhynchus mykiss irideus*)	FE, CSC	None, reported from the Santa Clara River (NDDB 2005) but barriers exist downstream of the Master Plan area that would preclude access to Brown Barranca.
Santa Ana sucker (*Catostomus santaanae*)	FT, CSC	None, reported from the Santa Clara River (NDDB 2005) but barriers exist downstream of the Master Plan area that would preclude access to Brown Barranca.
arroyo chub (*Gila orcuttii*)	CSC	None-Low, reported from the Santa Clara River (NDDB 2005) but surface water is rare within the Master Plan area.
Reptiles		
southwestern pond turtle (*Actinemys marmorata pallida*)	CSC, P	None-Low, surface water is rare, no suitable pool habitat.
two-striped garter snake (*Thamnophis hammondi*)	CSC, P	None-Low, prey base (small fish and amphibian larvae) is rare or absent.
San Diego mountain kingsnake (*Lampropeltis zonata pulchra*)	CSC	None-Low, prey base (lizards, snakes, bird eggs) is rare or absent due to surrounding development.
Birds		
western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FC, SE	None, rarely reported from the Santa Clara River (NDDB 2005), habitat within Master Plan area is not suitable.
least Bell's vireo (*Vireo belli pusillus*)	FE, SE	None-Low, reported nesting in the Santa Clara River (NDDB 2005) in riparian habitats. Habitat within Master Plan area is too small, fragmented, and lacks upland foraging areas.
southwestern willow flycatcher (Empidonax trailii extimus)	SE, FE	None, rarely reported from the Santa Clara River (NDDB 2005), habitat within Master Plan area is not suitable.
Cooper's hawk (*Accipiter cooperi*)	CSC	Low-Moderate, common in the region (Ventura Audubon Society, 2003). May forage within

Table 4.3-2
Special Status Wildlife Species with Potential to Occur in the Plan Area

Common Name (Scientific Name)	Status	Occurrence within the Plan Area
		the Brown Barranca, no suitable nesting habitat.
ferruginous hawk (*Buteo regalis*)	CSC	Low, an uncommon migrant (Ventura Audubon Society, 2003). Unlikely to forage within the Brown Barranca.
sharp-shinned hawk (*Accipiter striatus*)	CSC	Low, an uncommon migrant (Ventura Audubon Society, 2003). Unlikely to forage within Brown Barranca.
northern harrier (*Circus cyaneus*)	CSC	Low, an uncommon migrant (Ventura Audubon Society, 2003). Unlikely to forage within Brown Barranca.
golden eagle (*Aquila chrysaetos*)	CSC	Low, an uncommon migrant (Ventura Audubon Society, 2003). Unlikely to forage within Brown Barranca.
white-tailed kite (Elanus caeruleus)	SA, P	Low, uncommon in the region (Ventura Audubon Society, 2003). No suitable nesting habitat within the Master Plan area.
prairie falcon (*Falco mexicanus*)	CSC	None-Low, rare in the region (Ventura Audubon Society, 2003). No suitable nesting habitat within the Master Plan area.
long-eared owl (*Asio otus*)	CSC	None-Low, very rare in the region (Ventura Audubon Society, 2003). No suitable nesting habitat within the Master Plan area.
yellow warbler (*Dendroica petechia brewsteri*)	CSC (nesting)	**Observed** onsite (Rincon 2008) in appropriate breeding habitat during the breeding season. It was not observed nesting, but has the potential to nest onsite. Reported from the Santa Clara River, riparian vegetation within Master Plan area is considered marginal habitat as it is small, isolated, and lacks upland foraging areas
yellow-breasted chat (*Icteria virens*)	CSC	Moderate-Low, uncommon in the region (Ventura Audubon Society, 2003). Riparian vegetation within Master Plan area is considered marginal habitat as it is small, isolated, and lacks upland foraging areas.
Allen's Hummingbird *(Selasphorus sasin)*	SA (nesting)	**Observed** onsite (Rincon 2008) in appropriate breeding habitat during the breeding season. It was not observed nesting, but has the potential to nest onsite.
California horned lark *(Eremophila alpestris actia)*	Watch List	**Observed** onsite (Rincon 2008) in appropriate breeding habitat during the breeding season. It was not observed nesting, but has the potential to nest onsite.
Mammals		
pallid bat (Antrozous pallidus)	CSC	None-Low, no roosting habitat (caves, crevices, buildings) present within Master Plan area. Prey base (large insects) limited by cultivation, unlikely to forage within Master

Table 4.3-2
Special Status Wildlife Species with Potential to Occur in the Plan Area

Common Name (Scientific Name)	Status	Occurrence within the Plan Area
		Plan area.
California mastiff bat (Eumops perotis californicus)	CSC	None-Low, no roosting habitat (crevices) present within Master Plan area. Prey base (night-flying bees and wasps) limited by cultivation, unlikely to forage within Master Plan area.
pale big-eared bat (Plecotus townsendii pallescens)	CSC	None-Low, no roosting habitat (caves, mines, buildings) present within Master Plan area. Prey base (small moths and beetles) limited by cultivation, unlikely to forage within Master Plan area.
Ringtail (Bassariscus astutus octavus)	P	Low, no documented sightings in the project area, but may forage in Brown Barranca.

Source: Table 4, Padre Associates Inc., April 2007; and Rincon Consultants, Inc May 2008.

Status Codes: *FE Federal Endangered (USFWS)* *SE State Endangered (CDFG)*
FT Federal Threatened (USFWS) *CSC California Species of Special Concern (CDFG)*
FC Federal Candidate (USFWS) *P Protected under California Fish and Game Code*
SA Special animal (CDFG)

Of the birds observed during the nesting survey (Rincon Consultants, Inc 2008), Allen's hummingbird is considered a Special Animal by California Department of Fish and Game (CDFG) while nesting, the California horned lark is on the CDFG Watch List, and the yellow warbler is a CDFG Species of Special Concern while nesting. While none of these species were observed nesting onsite during the breeding season surveys, these specie shave a high potential of nesting onsite since they were observed during the breeding season in appropriate breeding habitat. These birds are not listed as threatened or endangered under the federal or state Endangered Species Acts, but are under consideration for conservation.

Specifically, a Species of Special Concern (SSC) is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- *Is extirpated from the State or, in the case of birds, in its primary seasonal or breeding role;*
- *Is listed as Federally-, but not State-, threatened or endangered;*
- *Meets the State definition of threatened or endangered but has not formally been listed;*
- *Is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or*
- *Has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status (Comrack et al. 2008).*

Allen's hummingbird (*Selasphorus sasin*) has a small geographic area of breeding and wintering ranges compared to other hummingbirds (Mitchell 2000). This, in addition to being at a potential competitive disadvantage for food sources with Anna's hummingbird (*Calypte anna*), has contributed to the decline in this species range. A female of this species was seen onsite, but its breeding status was unknown and more detailed surveys would be required to determine whether this species is nesting onsite. This species generally breeds from early February to mid-June (Mitchell 2000). Nest-building typically takes 8–11 days, incubation takes 17–22 days, and nestling period 18–23 days to fledging.

The **California horned lark** (*Eremophila alpestris actia*) is on the CDFG watch list, but it frequently intergrades with other subspecies, so is not always easy to differentiate in the field (Beason 1995). Moreover, the species is in need of review and revision to determine whether prairie and western subspecies represent discrete forms or a highly variable series (Beason 1995). This species is experiencing population declines partially as a result of land clearing in North America. As this species prefers to nest in agricultural fields that are sometimes marshy, it could be nesting onsite, but more detailed surveys would be necessary to determine breeding status. This species generally breeds from March through July (Zeiner et al. 2988).

The range of the **yellow warbler** (*Dendroica petechia*) is considered greatly (>40-80%) reduced, its range is slightly (>10-20%) reduced or suspected of having been reduced but the trend is unknown, and its population size is ≥ 100,000 but <1,000,000 individuals (Shuford and Gardali 2008). Although Shuford and Gardali (2008) do not note any records of breeding in Ventura County, this species generally breeds in riparian vegetation. Therefore, it is possible that this species is breeding on the site, but more detailed surveys would be necessary to determine breeding status. This species generally breeds from mid-April to early August (Zeiner et al. 1988).

c. Wildlife Corridors. Wildlife migration corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Migration corridors may be local such as between foraging and nesting or denning area, or they bay be regional in nature. Migration corridors are not unidirectional access routes; however, reference is usually made to source the receiver areas in discussion of wildlife movement networks. "Habitat linkages" are migration corridors that contain contiguous strips of native vegetation between source and receiver areas. Habitat linkages provide cover and forage sufficient for temporary habitation by a variety of ground-dwelling animal species. Wildlife migration corridors are essential to the regional ecology of an area as they provide avenues of genetic exchange and allow animals to access alternative territories as fluctuating dispersal pressures dictate.

Brown Barranca may provide a suitable wildlife migration corridor between the Santa Clara River Valley and the largely undeveloped areas to the north within Long Canyon and adjacent sub-watersheds. Concrete arched and box culverts beneath road crossing at the downstream ends of the subject reach of Brown Barranca would provide access for wildlife traversing the plan area. However, the concrete-lined trapezoidal channel downstream of the Specific Plan extends for about 1,000 feet through the SR 126/Wells Road interchange. The Study indicated that the steep concrete banks may discourage use of Brown Barranca by wildlife moving between the Santa Clara River and Long Canyon. In addition, dense growth of willows within the Master Plan area limits passage by larger mammals. Brown Barranca is therefore, not

considered an important wildlife movement corridor as reported by the biological study (Padre Associates, 2007).

d. Wetlands. As part of the Biological Study (Padre Associates, 2007; Appendix C), a wetland delineation was conducted to determine the likely area of jurisdiction of the Corps under Section 404 of the Clean Water Act and to determine the area of riparian vegetation that is likely within the jurisdiction of the California Department of Fish and Game. Figure 4.3-1 shows an aerial view of Brown Barranca within the plan area and the location of the transects that were utilized to determine the extent of wetland habitat. The plan area currently supports 4.14 acres of riparian habitat classified as California Department of Fish and Game wetlands (CDFG defines wetlands as synonymous with the limits of riparian vegetation) and approximately 0.11 acres of U.S. Army Corps of Engineers (Corps) defined wetlands.

e. Regulatory Setting. The following describes the regulatory context under which biological resources are managed at the federal, state, and local level. Agencies with responsibility for protection of biological resources within the plan area include:

- *Regional Water Quality Control Board (RWQCB)*
- *U.S. Army Corps of Engineers (wetlands and other waters of the United States)*
- *U.S. Fish and Wildlife Service (endangered species and migratory birds)*
- *California Department Fish and Game (waters of the State, endangered species, and other protected plants and wildlife)*
- *City of Ventura (General Plan Goals, Policies, and Actions)*

A number of federal and State statutes provide a regulatory structure that guides the protection of biological resources. The following discussion provides a summary of those laws that are most relevant to biological resources in the vicinity of the specific plan area.

Regional Water Quality Control Board. The protection of water quality in the watercourses of Ventura County is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The Board establishes requirements prescribing discharge limits and establishes water quality objectives through the Ventura County Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit. The Storm Water Quality Urban Impact Mitigation Plan (SQUIMP), which is part of the NPDES Permit, addresses specific storm water pollution requirements for new developments such as the proposed project. As co-permittee, the City of Ventura is responsible for assuring that new developments are in compliance with the SQUIMP.

The SQUIMP requires that all development projects implement various control techniques (termed best management practices, or BMPs) to minimize the amount of pollutants entering surface waters. The following requirements apply to all new development:

- *Control post-development peak stormwater runoff discharge rates to maintain or reduce pre-development downstream erosion and to protect stream habitat*
- *Conserve natural areas*
- *Minimize stormwater pollutants of concern*
- *Protect slopes and channels*
- *Provide storm drain system stenciling and signage*

- *Properly design outdoor material storage areas*
- *Properly design trash storage areas*
- *Provide proof of on-going best management practice (BMP) maintenance*
- *Implement structural or treatment BMPs that meet design standards*

U.S. Army Corps of Engineers (Corps). Under Section 404 of the Clean Water Act, the Corps regulates activities that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the United States. The proposed project includes culverting a 725 linear foot section of Brown Barranca within the plan area. The Applicant will be required to obtain the necessary Section 404 permits from the U.S. ACOE.

U.S. Fish and Wildlife Service. The U.S. Fish and Wildlife Service (USFWS) implements the Migratory Bird Treaty Act (16 United States Code (USC) Section 703-711), the Bald and Golden Eagle Protection Act (16 USC Section 668), and the Federal Endangered Species Act (FESA) (16 USC § 153 *et seq)*. Projects that would result in a "take" of any federally listed threatened or endangered species are required to obtain permits from the USFWS through either Section 7 (interagency consultation) or Section 10(a) (incidental take permit) of FESA, depending on the involvement by the federal government in permitting or funding the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what mitigation measures would be required to avoid jeopardizing the species.

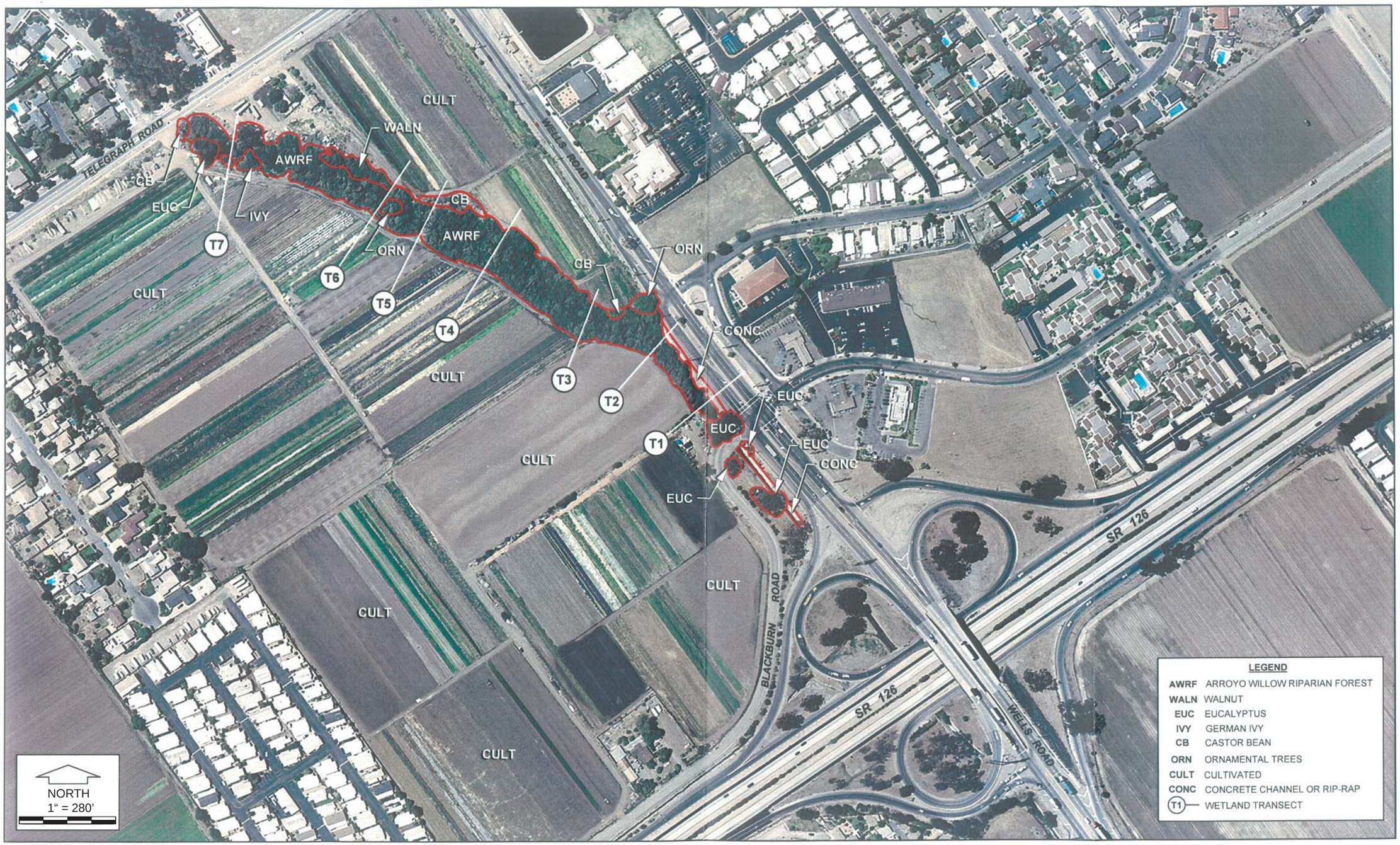
"Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect an individual, or to attempt to engage in any such conduct. Candidate species do not have the full protection of FESA; however, the USFWS advises project applicants that they could be elevated to listed status at any time.

California Department of Fish and Game. The California Department of Fish and Game (CDFG) derives its authority from the Fish and Game Code of California. The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 *et, seq,)* prohibits take of listed threatened or endangered species. Take under CESA is restricted to direct killing of a listed species and does not prohibit indirect harm by way of habitat modification.

California Fish and Game Code Sections 3503, 3503.5, and 3511 describe unlawful take, possession, or needless destruction of birds, nests, and eggs. Fully protected birds (Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

Species of Special Concern (CSC) is a category conferred by CDFG for those species which are considered to be indicators of regional habitat changes or are considered to be potential future protected species. Species of Special Concern do not have any special legal status except that afforded by the Fish and Game Code. The CSC category is intended by the CDFG for use as a management tool to take these species into special consideration when decisions are made concerning the development of natural lands.

The CDFG also has authority to administer the Native Plant Protection Act (Fish and Game Code Section 1900 *et seq*). The Act requires CDFG to establish criteria for determining if a



Vegetation and Wetland Transects

Source: Padre & Associates, Inc. November 2005

Figure 4.3-1

species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the Act, the owner of land where a rare or endangered native plant is growing is required to notify the Department at least 10 days in advance of changing the land use to allow for salvage of the plant.

Perennial and intermittent streams also fall under the jurisdiction of the CDFG. Section 1602 of the Fish and Game Code (Streambed Alteration Agreements) gives the CDFG regulatory authority over work within the stream zone (which could extend to the 100-year flood plain) consisting of, but not limited to, the diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream or lake.

The Department identified the following stressors affecting wildlife habitat: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; and 4) altered fire regimes.

City of Ventura. The City's 2005 General Plan Update provides the framework for evaluating potential biological impacts. The Conservation Element and other elements of the General Plan include policies to protect biological resources. Action 1.11 of the 2005 General Plan directs to "*Require that sensitive wetland and coastal areas be preserved as undeveloped open space wherever feasible and that future developments result in no net loss of wetlands or "natural" areas.*"

4.3.2 Impact Analysis

a. Methodology and Significance Thresholds. Impacts were assessed using available literature regarding the existing biological resources within the plan area, aerial photography, and field surveys of the plan area conducted at various times over the past three years (see page 4.3-1 for survey dates).

CEQA Statute 21001(c) states that it is the policy of the state of California to "prevent the elimination of fish and wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities." Environmental impacts relative to biological resources may be assessed using impact significance based on the CEQA guidelines and federal, state and local plans, regulations, and ordinances. Project impacts to flora and fauna may be determined to be significant even if they do not directly affect rare, threatened, or endangered species.

Pursuant to the Initial Study Analysis (see Appendix A), significant impacts to biological resources could occur if plan area development would result in:

- *A loss or disturbance to, or reduction in the numbers of, or a restriction in the range of, or an other impact to any unique, rare, threatened, or endangered species of animals, or plants, or their critical habitat.*
- *A reduction in the extent, diversity, or quality of native or non-native vegetation(including brush removal for flood control improvements)*
- *Impacts to historically designated species (e.g. heritage trees) or locally designated natural communities (e.g. sensitive habitat).*
- *Impacts to wetland or riparian habitat.*

b. Project Impacts and Mitigation Measures. Project impacts and mitigation measures are grouped by topic based on the potential to exceed a threshold of significance. The potentially adverse effect is identified and classified (impact classes are defined in Section 4.0) followed by an explanation.

Impact BIO-1 Development under the Parklands Specific Plan could have temporary adverse effects on special status species, if present, during and after construction due to vegetation removal, culverting of a portion of the barranca and the amount of time necessary for replacement vegetation to mature. This is a Class II, *significant but mitigable* impact.

The plan area contains approximately 1,660 linear feet of natural riparian habitat (Brown Barranca) surrounded by agricultural fields. The portion of the Brown Barranca within the project site contains two existing storm drain system discharge points: one located at the south side of the Telegraph Road culvert and the other located at the west side of Wells Road opposite of Carlos Road. The discharge of these storm drains comes from the urban and irrigation runoff from the residential and agricultural properties to the north and west of the project site. The findings of the Biology Impact Study indicate that although Brown Barranca constitutes riparian habitat, there is low potential for special-status aquatic species due to the intermittent flow regime and presence of instream barriers (concrete lined channel for portions of the barranca downstream of the plan area, and at least two low-flow channel waterfalls with heights of at least three feet within the plan area). Moreover, day-night surveys revealed a substantial population of African clawed frogs (*Xenopus laevis*), which prey on other aquatic and amphibious species (Rincon Consultants, Inc. 2008 – see Appendix C).

Thus, although climate and Brown Barranca's connectivity to the Santa Clara River indicate there is potential for southern steelhead, Santa Ana sucker, arroyo chub, southwestern pond turtle, and two-striped garter snake, repeated field visits and analysis of the plan area habitat and conditions immediately downstream indicate that the likelihood of occurrence for these water dependent species is none to low.

The findings of the Biology Impact Study indicate that temporary riparian habitat loss during construction could have a temporary adverse effect on special status species, including Cooper's Hawk, yellow warbler, and yellow-breasted chat if these individuals were to utilize the riparian habitat for foraging during construction and before revegetation has reached maturity. Moreover three birds with potential special status were observed onsite during the nesting bird survey (Rincon Consultants, Inc May 2008). These include Allen's hummingbird, which is considered a Special Animal by California Department of Fish and Game (CDFG) while nesting, the California horned lark, which is on the CDFG Watch List, and the yellow warbler, which is a CDFG Species of Special Concern while nesting. However, it is noted that other suitable nesting habitat exists offsite to the north of Telegraph Road within portions of Brown Barranca that would remain unaffected by project construction (see Figure 4.3-1). Only a portion of the habitat is shown on Figure 4.3-1; however, the habitat extends more than a mile upstream into Long Canyon.

There is also potential for the San Diego mountain kingsnake to occur within the plan area; however, the likelihood of occurrence was classified as none to low due to an inadequate prey

base (Padre Associates Inc., 2007). These snakes are dependant on lizards, other snakes, and bird eggs for prey, but the active agricultural row cropping associated with upland areas of the plan area reduces the habitat suitability for kingsnake prey and thus for San Diego mountain kingsnake.

With respect to plants, the only special status species present is southern California black walnut, but the grouping (indicated on Figure 4.3-1) of these trees would not be adversely affected by project construction because it is within the area proposed for preservation. Once developed, the plan area would maintain a riparian habitat corridor that would still provide habitat for wildlife species.

Mitigation Measures. The following mitigation measures would reduce the potential for adverse effects to special status species and habitats to a less than significant level.

BIO-1(a) **Pre-Construction Surveys.** A qualified biologist shall conduct pre-construction field surveys for arroyo chub, southwestern pond turtle, two-striped garter snake, San Diego mountain kingsnake, California red legged frog. If observed, these species shall be relocated to suitable habitat areas up- or downstream of the plan area.

BIO-1(b) **Construction Timing.** Work within 500 feet of Brown Barranca shall be planned to avoid the breeding bird season if feasible, which generally runs from March 1 to August 31, as early as February 1, for raptors. If avoidance of the breeding bird season is infeasible, BIO-1(c) shall be implemented.

BIO-1(c) **Nesting Bird Surveys.** If avoidance of the breeding bird season is not feasible, beginning 30 days prior to the disturbance of suitable nesting habitat, the project proponent should arrange for weekly bird surveys to detect protected native birds occurring in the habitat that is to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted with emphasis on Cooper's hawk, yellow warbler, yellow-breasted chat, Allen's hummingbird, California horned lark and other riparian-dependent special-status bird species.

The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If a protected native bird is found, the project proponent shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31.

Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet of raptor

nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and the juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel shall be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

Significance After Mitigation. The only special status species observed onsite are southern California black walnut trees, which would be avoided and saved, in addition to three species of birds, which are mobile. Any special status species within the creek would be removed prior to construction if found to be present during a pre-construction survey per mitigation measure BIO-1(a). Any nesting bird would be avoided during construction per mitigation measure BIO-1(b). In addition, other suitable nesting habitat exists offsite to the north of Telegraph Road within portions of Brown Barranca that would remain unaffected by project construction. Residual impacts to special status species and potential onsite habitat would be less than significant with mitigation.

Impact BIO-2 Development facilitated by the specific plan would require the disturbance of 1.63 acres of riparian/wetland habitat. However, revegetation of riparian/wetland habitat that would result in no "net loss" of habitat. Impacts are Class II, *significant but mitigable.*

Development under the proposed specific plan would involve the removal of riparian and wetland vegetation, which fits the definition of a natural community and a sensitive habitat. The plan area currently supports 4.14 acres of riparian habitat classified as California Department of Fish and Game wetlands (CDFG defines wetlands as synonymous with the limits of riparian vegetation) and approximately 0.11 acres of U.S. Army Corps of Engineers (Corps) defined wetlands. Figure 4.3-2 shows the proposed barranca modifications. Temporary and permanent adverse effects to riparian and wetland habitat are characterized in Table 4.3-3.

Approximately 1.63 acres of riparian vegetation/CDFG wetlands would be disturbed, including 0.86 acres that would be disturbed by temporary construction activity and 0.77 acres that would be permanently removed (see Figure 4.3-2). Approximately 0.03 acres of Corps defined wetlands would be disturbed. Project development includes a riparian habitat preserve that would function to maintain existing habitat as well as support enhancement activities to mitigate for adverse effects (see Figure 4.3-3). The preserve includes maintenance of a natural bottom open channel with riparian vegetation extending from Telegraph Road southeast to the downstream triple box culvert inlet. The preserve would exclude public access through split rail fencing and barrier plantings.

Table 4.3-3
Effects to Riparian and Wetland Habitat

Type of Habitat	Acres Present	Areas Affected by Specific Plan	Total Acres Affected	Percent of Total
Riparian Vegetation (CDFG-Defined Wetlands)	4.11	Temporary – 0.86 acres removed by: • Culvert installation and other proposed improvements • Proposed footbridge over Brown Barranca Permanent – 0.77 acres removed by: • Extension of existing upstream arched culvert by 75 feet including aprons, headwall and rip rap • Culverting 725 linear feet downstream including aprons, headwall and rip rap • Roadways, bike path, and associated components	1.63	40%
Corps-Defined Wetlands*	0.11	0.02 acres affected by box culvert aprons, headwall, and riprap plus 0.01 temporary construction	0.03	27%

Source: Padre and Associates, Biology Impact Study, April 2007.
Notes: Corps defined wetlands occur within the limits of CDFG defined wetlands; therefore, the total area affected is 1.63 acres.

The preserve area contains approximately 0.21 acres of non-native invasive species such as castor bean and eucalyptus, which are proposed for replacement with native species for enhancement and offset (see Figure 4.3-3). Additionally, the project includes two other proposed native vegetation enhancement areas to offset adverse effects. A natural man-made channel is proposed overlying the downstream culvert installation and a detention basin/wetlands creation area is proposed in the southeastern portion of the plan area adjacent Blackburn Road. The project restoration areas are detailed in Table 4.3-4.

Table 4.3-4
Proposed Riparian and Wetland Habitat Enhancements

Type of Habitat	Acres Proposed	Total Acres Proposed
Riparian Vegetation CDFG Defined Wetlands	• 0.83 acres of riparian habitat creation above downstream culvert * • 0.21 replacement of invasive species with native riparian species within the preserve	1.01
Detention Basin/Wetlands Creation	0.35	0.35
Total Habitat Creation		**1.36**

Source: Padre and Associates, Biology Impact Study, April 2007.
The Office of Katie O'Reilly Rogers, Exhibit 2, April 2007 (Figure 8 in Appendix A)

** The riparian habitat creation area includes approximately 300 feet of walkways that are 5 feet wide, which will be finished in decomposed granite or asphalt and would not contribute to mitigation area (Moule & Polyzoides, April16, 2007). This amounts to 0.03 acre, which has been deducted from the total riparian habitat creation area of 0.83 acres as indicated on Figure 8 in App. A*

Action 1.11 of the 2005 General Plan requires that sensitive wetland and coastal areas be preserved as undeveloped open space wherever feasible and that future developments result in

no net loss of wetlands or "natural" coastal areas. CDFG defined wetlands include the limits of riparian vegetation, whereas the Corps designates wetlands based on the presence of hydrology, hydric soils indicators and wetland vegetation. Based on these two definitions, the project would have no net loss of wetlands pursuant to Corps designation criteria because 0.35 acres of wetland creation in the detention basin would offset the permanent impact of 0.02 acres for installation of the box culverts. However, evaluating pursuant to CDFG criteria, the project would result in a net loss of an estimated 0.27 acres of CDFG-defined wetlands. This impact would be significant, but mitigable.

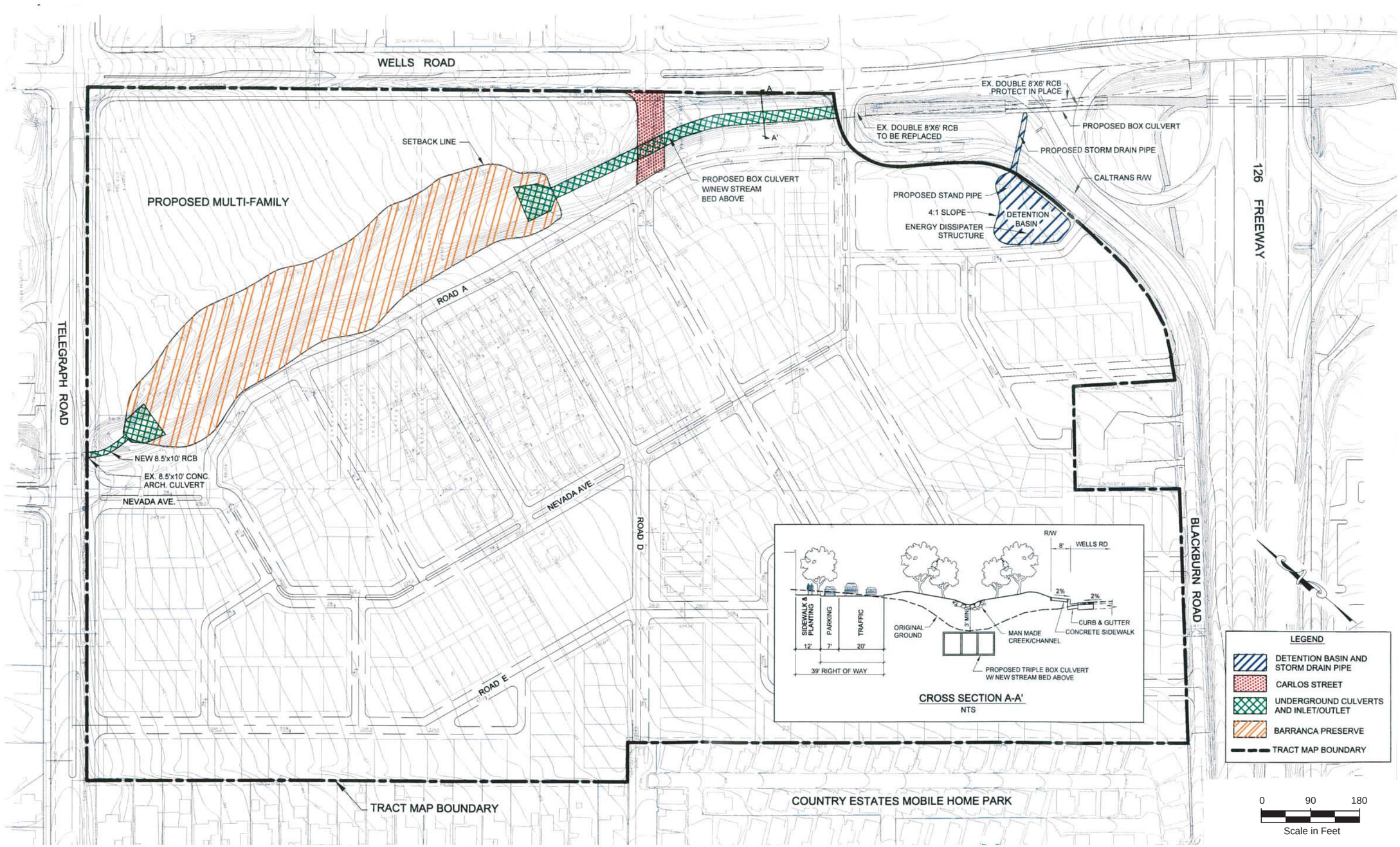
Mitigation Measures. The following mitigation measures would reduce the project's adverse effects on wetlands to a less than significant level under CEQA.

BIO-2(a) **Invasive Plant Removal.** The applicant shall remove invasive or non-native plants from the Brown Barranca Preserve area, including (but not limited to) castor bean, German ivy, garden blackberry, free tobacco, garden nasturtium, and palm trees.

BIO-2(b) **Wetland Creation.** The applicant shall mitigate the removal of riparian vegetation (CDFG defined wetlands) at a minimum ratio of 1:1. The mitigation may be done on-site by increasing the area of the Brown Barranca preserve where feasible to eliminate landscape specimens and incorporate native riparian species between the bikepath/footpath and the preserve such that the total area of the preserve is increased by 0.27 acres or the applicant may mitigate off-site through in-kind mitigation banks within the same watershed subject to review and approval by the Planning Division or their designee.

BIO-2(c) **Barranca and Basin Maintenance Plan.** The applicant shall develop and implement a maintenance plan to assure that future maintenance of the detention basin, Brown Barranca and associated slopes for permanent erosion control measures, which will minimize adverse effects to vegetation and promote maturation of wetland vegetation such that a Corps defined wetland, is formed.

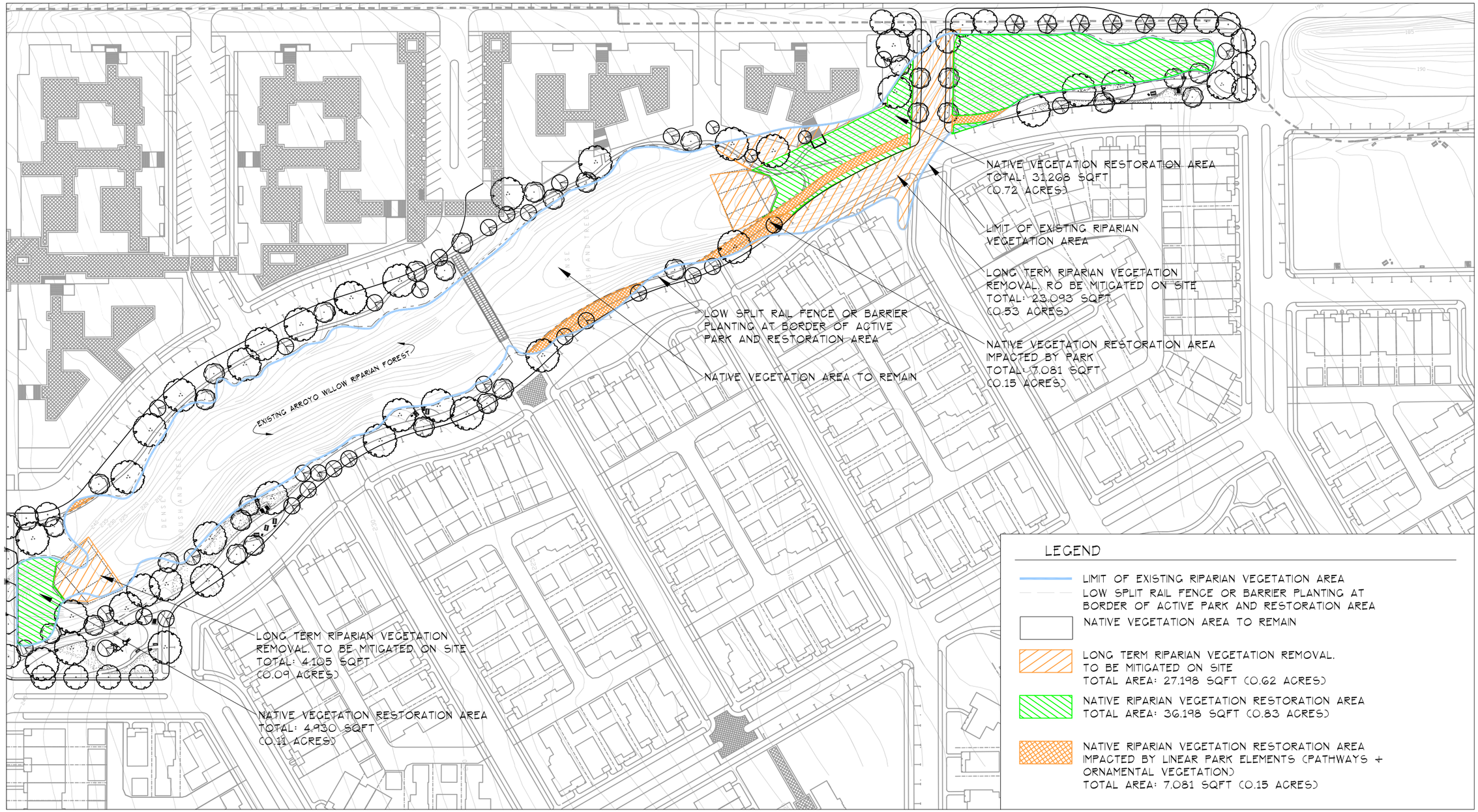
Significance After Mitigation. The applicant proposes creation of 1.36 acres of wetland/riparian habitat, of which 0.35 acres is anticipated to qualify for Corps criteria due to specialized maintenance practices within the detention basin. Thus, the specific plan would result in no net loss of wetlands pursuant to Corps designation criteria, and would maintain the majority of the riparian habitat present within the plan area. Of this area, the Brown Barranca Preserve would contain 2.54 acres of habitat, while the downstream restoration area would include 0.80 acres of man-made channel enhanced with riparian vegetation and the detention basin would potentially contain up to 0.35 acres of wetland vegetation. The residual impact would be less than significant.



Proposed Barranca Modifications

Source: Padre & Associates, Inc. November 2005

Figure 4.3-2



Riparian Vegetation and Restoration Areas

Figure 4.3-3

Source: Katie O'Reilly Rogers, Inc., April 2007.

Impact BIO-3 **Development of the plan area would place development in close proximity to sensitive biological resources. Development would introduce noise, lighting, domestic animals, and introduce potential erosion and sedimentation effects. This could potentially reduce the habitat quality for sensitive vegetation and wildlife species and would be a Class II, *significant but mitigable*, impact.**

Project development would introduce noise, lighting and domestic animals in areas adjacent to the Brown Barranca preserve. In addition, the proximity of residential development could allow for pedestrian access to the preserve, which has potential to degrade the quality of the habitat. Although no protected animal species were observed and the potential for occurrence is low to none, there is potential for disturbance to wildlife utilizing the habitat. Therefore, mitigation has been included to require fencing and signage for residents that would limit access and educate residents regarding the sensitive nature of the habitat. In addition, adverse effects to the habitat could occur if erosion and sedimentation were to occur as a result of work in and around Brown Barranca.

Mitigation Measures. Incorporation of the following mitigation measures would reduce the projects effect on wildlife in the Brown Barranca preserve would be less than significant.

BIO-3(a) **Proper Erosion Control Device Installation.** The applicant shall install erosion control devices in areas that have the potential to drain to Brown Barranca throughout the construction duration and prior to vegetation establishment. These devices should include silt fencing, sandbags, straw wattles, and/or straw bales.

BIO-3(b) **Split-Rail Fencing.** The applicant shall install aesthetic (split-rail) fencing between the proposed footpath and Brown Barranca to reduce disturbance of habitat.

BIO-3(c) **Biological Resource Signage.** The applicant shall provide signage and written materials to all property owners describing biological resources and prohibiting entry into the Brown Barranca Preserve.

BIO-3(d) **Oil/Grease Traps.** The applicant shall fit inlets of all storm drains with easily accessible trash excluders approved for use by the City and the Regional Water Quality Control Board. Low Impact Development (LID) principles established in the City's Municipal (MS4) Stormwater Permit shall be used to manage street runoff to meet stormwater quality objectives. Other than litter exclusion, stormwater quality objectives shall not be accomplished in the storm drain inlets. Rather, the objectives shall be accomplished through LID practices.

Significance After Mitigation. Implementation of Mitigation Measures BIO-3(a-d) would reduce impacts associated with development in close proximity to sensitive biological resource to less than significant.

c. Cumulative Impacts. The significance of cumulative impacts to biological resources is based upon:

- *The cumulative contribution of the projects and other approved and proposed projects to fragmentation of open space in the project vicinity*
- *The loss of sensitive habitats and species*
- *Contribution of the projects to urban expansion into natural areas*
- *Isolation of open space within the proposed projects by future projects in the vicinity*

Development of the proposed Parklands Specific Plan, in conjunction with other development in the Ventura area, would continue to disturb areas with the potential to affect biological resources. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add more than 8,300 dwelling units, as well as about 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development. Biological resource impacts related to cumulative development are dependent upon the specific site and nature of an individual development. Biological resources issues must be addressed on a case-by-case basis.

Growth in the eastern portion of the City is expected to develop over time. Such development may have cumulatively considerable biological impacts. In the immediate project vicinity, the UC Hansen Trust Specific Plan proposes residential development atop existing agricultural lands. While overall growth of the City would have a cumulative biological impact, development under the Parklands Specific Plan would not make a substantial contribution to the cumulative impact, as impacts associated with this development can be mitigated to a less than significant level.

4.4 CULTURAL RESOURCES

This discussion summarizes the findings of the Phase I Archaeological Survey prepared by Conejo Archaeological Consultants (June 2006). This section analyzes potential impacts to archaeological resources. The archaeological resource analysis included a records search with the South Central Coastal Information Center (SCCIC), a field visit to the plan area, and analysis of historic aerial photographs. The full report is contained in Appendix D.

4.4.1 Setting

a. Prehistoric Overview. The plan area lies within the historic territory of the Native American Indian group known as the Chumash. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast, and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands. The Chumash are subdivided into factions based on distinct dialects. Ventura County is within the historic territory of the Ventureño Chumash. The Ventureño were the southernmost Chumash group, occupying most of the area of present day Ventura County and the southwest corner of Los Angeles County. The name Ventureño is derived from the mission with local jurisdiction, San Buenaventura.

b. Historic Overview. As part of the Phase I Archaeological Survey, Earth Systems (2005) completed a historic land use review of the plan area that included an examination of historic aerial photographs and historical topographic quadrangles. The historic review started with aerial photographs dating as far back as 1903. From this date through the 1989 photographs, the plan area has remained relatively unchanged. The plan area was developed with one to two residential structures and has been in agricultural cultivation. As indicated in the records search, no places of historic significance are present on the plan area.

c. Records Search Results. A records search was conducted as part of the Phase I Archaeological Survey at the SCCIC at CSU Fullerton, dated May 25, 2006. The SCCIC record search identified no prehistoric or historic archaeological sites within a 0.5-mile radius of the plan area. Three historic structures are located within a 0.5-mile radius of the plan area, but none of them are located within or adjacent to the plan area and they will not be affected by project development. The listings of the National Register of Historic Places, California Historical Landmarks, California Historic Property Data File, and the California Points of Historical Interest, include no properties within or adjacent to the plan area. Additionally, no Ventura County Historical Landmarks are located within or adjacent to the property.

d. Field Reconnaissance Survey Results. An archaeological field survey was conducted as part of the Phase I Archaeological Survey. The methodology involved walking transects through the plan area. The field survey indicated that the ground surface has been extensively disturbed by agricultural activity that dates back prior to the 1930s. The field survey noted no evidence of prehistoric or historic resources within the plan area.

4.4.2 Impact Analysis

a. Methodology and Significance Thresholds. This assessment is based on the information gathered and analyzed in the Phase I Archaeological Survey (Conejo, 2006). This

survey included a records search with the South Central Coastal Information Center (SCCIC), a field visit to the plan area, and analysis of historic aerial photographs.

Cultural resource impacts are considered significant if the proposed project would:

- *Cause a substantial adverse change in, or destroy or disturb important significant or unique historical, archeological or paleontological resources, including human remains interred outside formal cemeteries*

For purposes of this analysis, cultural (archaeological and historic) resources include the following:

- *A resource listed, or determined to be eligible by the State Historical Resources Commission for listing, in the California Register of Historical Resources*
- *A resource included in a local register of historical resources or identified as significant in an historical resource survey*
- *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California*

b. Project Impacts and Mitigation Measures.

Impact CR-1 **The proposed project would not disturb any recorded cultural resources. However, site development has the potential to disturb as yet undetected cultural resources. This is a Class II, *significant but mitigable*, impact.**

Per the Phase I Archaeological Survey, no evidence of sensitive archaeological or historic resources was found within the plan area. The survey include a site visit, records search, and review of historical aerial mapping. Furthermore, it is unlikely that buried cultural resources are present within the plan area since the area has been highly disturbed by past and ongoing agricultural activity. The records search did not indicate any historical resources within one-half mile of the plan area. Nevertheless, it is possible that as yet undetected cultural resources are present. Therefore, impacts are considered potentially significant.

Mitigation Measures. The following mitigation measures are required to mitigate the potential for adverse effects to cultural resources to a level that is less than significant.

CR-1(a) **Temporary Work Suspension if Resources Unearthed.** In the event that archaeological or paleontological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist or paleontologist as appropriate has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation work associated with Native American cultural material.

CR-1(b) **Human Remains Procedures.** If human remains are unearthed, State Health and Safety Code Section 7070.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin an disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

Significance After Mitigation. With implementation of the above measures, potential impacts to as yet unknown archaeological resources would be reduced to a less than significant level.

c. Cumulative Impacts. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add more than 8,300 dwelling units, as well as about 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development. Adverse effects to known resources are avoided or mitigated based on the environmental investigation and recommendations of specialists including historians, archaeologists, and paleontologists. However, there is always the potential for as yet undiscovered buried resources. Nevertheless the potential for adverse effects to as yet undiscovered resources is evaluated and mitigated on a case by case basis through mitigation as well as State health and safety code and public resources code.

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4.5 HAZARDS and HAZARDOUS MATERIALS

This section discusses potential impacts relating to soil and groundwater contamination. The analysis is based upon the findings of Phase I and II Environmental Site Assessments (ESAs) for the proposed Specific Plan by Earth Systems Southern California (November 2005) and Earthsystems Southwest (November 2006). The findings of the reports were also peer reviewed by Rincon Consultants, Inc. The Phase I ESA investigates the potential for recognized environmental conditions that warrant further investigation. The Phase I ESA included a limited site reconnaissance, regulatory agency database review, site use history research, and preparation of the report. The Phase II ESA included exploration of the recognized environmental conditions that were identified in the Phase I ESA. The Phase II ESA included 99 soil samples for laboratory analysis, eight borings, and a geophysical survey with subsequent analysis and preparation of a report. The Phase II ESA identified soil contamination relative to former agricultural uses and recommended measures to reduce the potential for adverse effects to a level that is less than significant. These documents are incorporated by reference and are available for review at the City of Ventura Community Development Department.

4.7.1 Setting

The plan area consists of approximately 66.7 acres located at the southwest corner of Telegraph Road and Wells Road. The plan area is currently utilized for agricultural operations, including cultivation of row crops and flowers.

a. History and Phase I and II Results. The plan area is located on lands that historically have been and continue to be used for agricultural production. The majority of the plan area consists of orchards and agricultural fields from at least 1938. The Phase I ESA conducted for the plan area indicates that agricultural chemicals are currently used and stored on the property. As discussed above, a Phase II ESA was completed to identify soil conditions. That study identified potential hazards associated with contaminated soil due to former use of organochlorine pesticides (OCP), asbestos-cement debris likely from subsurface irrigation systems, and an underground storage tank.

Contaminated Soil. The upper ½ foot of soil in the northwest quadrant of the project area is contaminated with TDE, which is an OCP that is a combination of the values of DDT (1,1,1-trichloro-2,2-bis(p-chlorophenyl)ethane), DDD (1,1-dichloro-2,2-bis(p-chlorophenyl) ethane), and DDE (1,1-dichloro-2,2-bis(chlorophenyl) ethylene). The highest detected concentration was 2.34 milligrams (mg) per kilogram (kg) of soil in surface sample-111 (delineated as ss-111 on Figure 4.5-1). Additionally, two other areas of contaminated soil were found. One is located along the northern boundary of the northwest field area in association with a storage area and the other is located along the eastern portion of the plan area, east of Brown Barranca and south of the residence at the "Address Location" (as delineated on Figures 4.5-1 and 4.5-2). The highest concentration detected in the northwest storage area was 1.69 mg/kg of soil, and the affected soil volume was estimated at 270 cubic yards. Concentrations of TDE in contaminated soil located on the east side of Brown Barranca were found to exceed the Title 22 Total Threshold Limit Concentration of 1.0 mg/kg of soil and also contained Dieldrin and Toxaphene at levels in excess of preliminary remediation goals (PRGs). DDT, DDD, and DDE (TDE) are all forms of a synthetic organochlorine insecticide that was banned in the United

States in 1972 due to its adverse effects upon wildlife as it biomagnifies through the foodchain (http://www.emla.hu/prtr/chems/toxfaq.html#-T-). Dieldrin is a chlorinated hydrocarbon used as an insecticide before its ban by the United States. Is has been shown to be not break down easy and biomagnify as it is passed through the foodchain. Toxaphene is another organic compound formulated for use as an insecticide before it was found to have adverse effects. Toxaphene was banned by the United States in 1990 and is documented as having adverse effects on the liver, kidneys, adrenal glands and immune system in animals that ingested contaminated food or water (http://www.emla.hu/prtr/chems/tfacts94.html).
Table 4.5-1 illustrates the pollutant levels exceeding established thresholds at identified sample areas. Figures 4.5-1 and 4.5-2 illustrate the locations of the samples on an aerial photograph.

Table 4.5-1
Measured Pollutant Levels Exceeding Thresholds

Sample ID	Area	DDT, DDE, and DDE	Dieldrin	Toxaphene
SS-105-106	Field	--	--	0.44
SS-109-110	NW Field	1.16	--	--
SS-109	NW Field	1.19	--	--
SS-110	NW Field	1.46	--	--
SS-111-112	NW Field	1.85	--	--
SS-111	NW Field	2.34	--	--
SS-112	NW Field	1.69	--	--
SS-303	NW Field	1.31	--	--
SS-304	NW Field	1.27	--	--
SS-305	NW Field	1.55	--	--
SS-306	NW Field	1.14	--	--
SS-213-214	NW Storage	1.763	--	--
SS-213	NW Storage	1.69	--	--
SS-214	NW Storage	1.46	--	--
SS-309	NW Storage	1.09	--	--
SS-219-220	Address Location	1.03	--	0.59
SS-220	Address Location	1.1	0.050	1.1
Regulations	TTLC	1.0 mg/kg as sum total of DDT, DDE, DDD (TDE)	8.0 mg/kg	5 mg/kg
	Residential PRG	2.4 mg/kg for DDD, 1.7 mg/kg for DDE and DDT	0.03 mg/kg	0.44 mg/kg

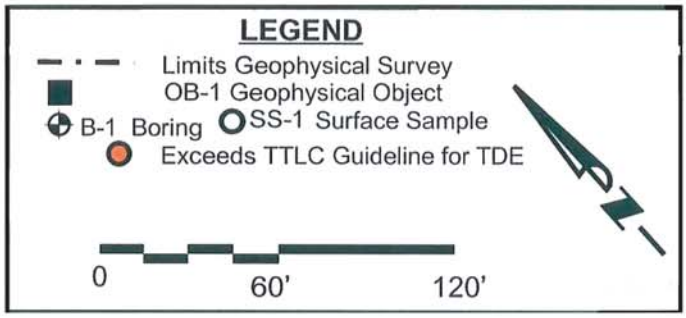
Notes: Only those samples and concentrations above the established thresholds were included in the table. For the complete the table, See Figure 1 and 2 of the Phase II ESA which can be found at the City of Ventura Planning Counter.
All concentrations are in mg/kg
PRG = US EPA Preliminary Remediation Goal for Residential Uses
TTLC = Total Threshold Limit Concentration
Source: Earth Systems Southern California, Phase II Investigation, November 22, 2006.

Sample and Boring Locations

Figure 4.5-1

Reference: Google Earth

Basemap Source: Earth Systems Southwest, November 2006.
Image Source: Google Earth, 2007.



Address Location and Vicinity
Sample and Boring Locations

Figure 4.5-2

Soil Staining at the Irrigation Well. Soil staining was identified by the Phase I ESA at the western most irrigation well. Discussions with Earthsystems staff revealed that this recognized environmental condition (REC) was ruled out as requiring further investigation because the lubricating oil is non-toxic and because this conditions is commonly associated with water wells, and is typically not considered an issue of concern (personal communication with Scott Stormo of Earthsystems Southwest, August 2008). This is because of the generally minor quantities of oil that could seep through the ground to the water and because of the non-toxic nature of the oil. Well abandonment will involve excavation to a depth of five feet and capping the well, with backfilling of soil. The potential for adverse health effect to humans and/or wildlife does not pose a significant threat.

Asbestos Cement. A piece of asbestos cement (AC) approximately 5 feet long and 6 inches in diameter was observed in the southern field area in a pile of agricultural debris. Historically, AC pipe was typically installed in irrigation systems expected to have moderate water pressures, which would exceed the strength of concrete pipe but be less than the design strength of AC pipe. The topography of the plan area falls within that range, so it is possible that AC pipe was used in the on-site irrigation system, particularly in the southern portion of the site. Asbestos containing material poses a health threat due to its ability to adversely affect humans through respiration.

Underground Storage Tank. A 12-foot long, 4-foot diameter underground storage tank was found at location OB-3 (as delineated on Figure4.5-2), north of the contaminated soil location at SS-220. Soils under the tanks were sampled to detect total petroleum hydrocarbons; however, none were detected near the base of the UST and only trace amounts of Toluene were detected. Trace amounts are quantities that are detectable, but are not large enough to be measured.

b. Regulatory Setting. State and Federal governmental agencies regulate the use, storage, and transport of hazardous materials through numerous legal and regulatory requirements. Among other requirements, existing regulations require businesses that store, use, or manufacture specific amounts of hazardous materials to report the quantities and types of materials to the local administering agency. For the City of Ventura, the Ventura County Environmental Health Department (VCEHD) is the regulatory agency with primary responsibility for ensuring that businesses in the County handle, store, and dispose of and clean up hazardous materials in accordance with applicable laws and regulations. The Ventura Fire Department also implements requirements pertaining to the use and storage of flammable and explosive materials. Additionally, the Ventura County Air Pollution Control District (VCAPCD) oversees the permitting process for hazard remediation for certain hazardous materials.

The U.S. Environmental Protection Agency sets Preliminary Remediation Goals for residential and industrial uses, which are normally utilized in determining the allowable levels of a potential contaminant at a particular site. Similarly, the California Title 22 Total Threshold Limit Concentration (TTLC) is used for determining whether a material is classified as a hazardous waste. However, the regulatory status of pesticide residues is dependent upon how the residue was formed. Pesticide residues that result from legal use of the product are not subject to hazardous waste regulations, because the material is present as a result of its intended

use. Residues from spills are subject to hazardous waste regulations, because spills are not an intended use and a spilled material is a "waste" if it can no longer be used. In addition, if a soil containing pesticide residues is disposed of, then the hazardous waste regulations apply because the soil has become a waste. Regardless of whether the hazardous waste regulations apply, adverse health effects can result from exposure to pesticide residues. Mitigation of adverse health effects may be warranted, even if the material is not classified as a hazardous waste.

4.7.2 Impact Analysis

a. Methodology and Thresholds of Significance. The assessment of potential hazardous impacts is based on a Phase I and II ESA conducted for the plan area. For the purpose of this analysis, a significant effect would occur if Specific Plan implementation would create a substantial hazard to the public or the environment through exposure to existing contamination. Specifically, impacts are considered potentially significant if contaminant concentrations would potentially exceed published regulatory action levels. If contaminants exceed published regulatory thresholds, the impact can be reduced to a less than significant level if remediation is undertaken to remove, treat, or otherwise reduce the contaminant concentrations to below regulatory action levels.

b. Project Impacts and Mitigation Measures.

Impact HAZ-1 Soils within the plan area have been utilized for agricultural operations, contaminants pose potential health hazards to humans and the risk of upset. Impacts associated with development of the plan area would be Class II, *significant but mitigable*.

The Parklands Specific Plan would involve development on lands currently and historically used for agricultural production. As noted in the *Setting*, the Phase II ESA identified potential hazards associated with contaminated soil due to former use of organochlorine pesticides (TDE), asbestos-cement debris likely from subsurface irrigation systems, and an underground storage tank. Asbestos and the UST impacts are discussed in Impacts HAZ-1 and HAZ-2, respectively.

Based on the results of the Phase II ESA conducted for the plan area, contaminated soil exceeding applicable preliminary remediation goals (PRGs) is present within the plan area. The "Address Location" area included two instances where Toxaphene and one sample where Dieldrin exceeded the established PRGs (see Table 4.5-1 and Figure 4.5-2). Two other samples with Toxaphene levels at the residential PRG were found within the field area (see SS-105 and SS-106 in Table 4.5-1 and on Figure 4.5-1). However, because these two samples do not exceed the residential PRG, no further action is necessary.

TDE was found in concentrations exceeding the TTLC value of 1.0 mg/kg in eight of ten samples within the northwest field area. Unless remediated, such contamination has the potential to result in a hazard to human health. The contaminated soil would be classified as hazardous waste if transported off-site and the hazard associated with the contamination is related to contact. The chemicals are not mobile or soluble in water, but contaminated soil

could present a hazard to humans and animals through contact or ingestion. The potential for adverse effects to human health and risk of upset is therefore significant.

Mitigation Measures. The following measure shall be implemented to mitigate potentially significant adverse health hazards relating to plan area soil contamination.

HAZ-1 **Contaminated Soil.** Two areas of soil contamination necessitate either onsite sequestration, or offsite disposal or some combination of both as described below. These include soils in the following locations.

1) The upper ½ foot of soil in the northwest quadrant of the plan area (see Figure 4.5-1) due to contamination with TDE, including the upper ½ foot of soils in the western part of the NW storage location (see Figure 4.5-1).

2) The upper ½ foot of soils within a 10-foot radius of SS-220 (see Figure 4.5-2) due to contamination with TDE.

Onsite Sequestration. The upper ½ foot of soil (or as recommended by the Ventura County Environmental Health Division) shall be removed from both locations, and shall be sequestered on-site in a manner approved by the Ventura County Environmental Health Division. Sequestration necessitates isolation from human and wildlife contact and would require that the soil be buried onsite at depths unlikely to be disrupted, or would require capping by pavement or asphalt. Areas suitable for capping might include beneath the parking garages, or beneath roadways. Onsite sequestration shall be conducted as directed by Ventura County Environmental Health.

Offsite Disposal. The upper ½ foot of soil shall be removed from both areas and shall be transported off site and disposed of as hazardous waste at an approved facility in accordance with applicable rules and regulations.

Significance After Mitigation. Implementation of the mitigation measures identified above would reduce human health risks associated with possible contamination from pesticides to a less than significant level.

Impact HAZ-2 **Development facilitated by the proposed Specific Plan would require the removal of materials containing asbestos. Demolition or removal of these items could result in dispersal of this contaminant. This is a Class II, *significant but mitigable,* impact.**

Based on the results of the Phase II ESA conducted for the project, a piece of asbestos concrete (AC) pipe was found (see Figure 4.5-1 in the central portion of the plan area). Removal of this

piece of AC piping and any other AC piping discovered during construction could pose a health hazard and risk of upset due to potential dispersal of asbestos. Sensitive receptors are located adjacent the western boundary of the plan area (mobile homes are closest, at about 20 feet from the boundary), while medical offices and a senior assisted living community are located across Telegraph Road to the north about 100 feet away. To the east across Wells Road, a school and more medical offices are located about 90 feet away. The EPA has determined that there is no completely safe level of exposure to asbestos. Exposure to asbestos occurs when its fibers are released into the air and inhaled. The danger occurs when smaller fibers in the air become embedded in the lungs, and the body has no way to remove them. Usually, symptoms do not appear for 20 or more years after the first exposure. Exposure to asbestos increases the risk of lung cancer in individuals by five times. Cancer of the stomach and internal organs such as the mouth, esophagus, larynx, kidneys, and colon can also be caused by asbestos exposure. The presence and removal of asbestos concrete pipe is a potentially significant impact.

Mitigation Measure. The following measure shall be implemented to mitigate potentially significant adverse health and safety impacts to a less than significant level.

HAZ-2. Asbestos Cement. Prior to any demolition or renovation, the identified asbestos cement piping located in the southern field area in a pile of agricultural debris (see Figure 4.5-1) and any other AC piping discovered during construction shall have the asbestos containing material removed according to proper abatement procedures recommended by the asbestos consultant and as required by the VCAPCD. All abatement activities shall be in compliance with California and Federal OSHA, and with the VCAPCD requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement. All asbestos containing material removed from onsite shall be transported by a licensed to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest.

Significance After Mitigation. Implementation of the above mitigation measure would reduce human health risks associated with the removal of asbestos-containing materials to a less than significant level. In the long-term, removal of asbestos-containing materials from the plan area would generally improve health and safety conditions for area residents.

Impact HAZ-3 An underground storage tank (UST) was found on the plan area. These would require removal pursuant to Ventura County Environmental Health Department regulations. Impacts associated with this UST would be Class II, *significant but mitigable*.

As discussed in the *Setting*, the Phase II ESA conducted for the plan area identified a UST at location OB-3, north of the contaminated soil location at SS-220 (see Figure 4.5-2). Soils around the tanks were sampled to detect total petroleum hydrocarbons. None were detected near the base of the UST and only trace amounts of Toluene were detected. Nevertheless, the presence of the tank presents a potentially significant upset hazard.

Mitigation Measures. The following measure shall be implemented to mitigate potentially significant adverse health and safety impacts to less than significant.

HAZ-3 **Underground Storage Tank.** The underground storage tank (see OB-3 on Figure 4.5-2) shall be properly excavated and disposed of according to the guidelines of the Ventura County Fire Department and the Ventura County Environmental Health Division. These guidelines require the following:

1) Preparation of an application for permanent closure available for download at http://www.ventura.org/rma/envhealth/programs/cupa/hzustpgm.htm
2) Excavation oversight by a Ventura County Environmental Health Division Inspector
3) A permanent closure report submitted to the Ventura County Certified Unified Program Agency (CUPA) with copies of all receipts, manifests, transport documents, sample results, chain of custody, plot plans, and unauthorized release form (if necessary).
4) Soil samples must be collected in approved containers for analysis pursuant to Environmental Protection Agency Method 5035 for hydrocarbon samples. Los Angeles Regional Water Quality Control Board

Significance After Mitigation. Implementation of the above mitigation measure would reduce human health risks associated with the UST located within the plan area to a less than significant level.

c. Cumulative Impacts. Cumulative development in Ventura would have the potential to expose future area residents, employees, and visitors to hazards by developing and redeveloping areas that may previously have been contaminated. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add more than 8,300 dwelling units, as well as about 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development. The magnitude of hazards for individual projects would depend upon the location, type, and size of the development and the specific hazards associated with individual sites. Therefore, hazard evaluations would need to be completed on a case-by-case basis. If soil and groundwater contamination is found to be present on sites of planned and future development, these conditions would be required to be mitigated so as to meet regulating agency remediation goals. Implementation of appropriate remedial action on all contaminated sites on a case-by-case basis would avoid potential hazard impacts associated with cumulative development in the City. In the long-term, remediation of existing soil and groundwater contamination would improve health and safety conditions in the community.

4.6 DRAINAGE AND FLOOD HAZARDS

This section addresses impacts related to drainage and flood hazards. This section is based on analysis in the initial study (see Appendix A) and information provided in the following reports. These reports are included in Appendix E.

- *Parklands Development TTM No. 5632 Detention Design*. December 28, 2006, Revised July 27, 2008, second revision October 20, 2008. Hawks & Associates.
- *Memorandum – Notice of Intent to Adopt a Negative Declaration, Parklands Specific Plan, Responses to Ventura County Watershed Protection District Comments.* July 29, 2008. Hawks & Associates.
- *Parklands Specific Plan, March 7 2008. Section IV F*. Water and Hydrology.
- DTR Engineering Memorandum (October 7, 2005) containing Hawks & Associates Engineering Memorandum (October 7, 2005).
- *Brown Barranca Hydraulic Study (Henderson Road to Telegraph Road)*. December 2006. Omrun Engineering.

4.6.1 Setting

a. Hydrology. The City of Ventura's general drainage pattern begins in the hills above of the City and terminates in the Ventura River, Santa Clara River or the Pacific Ocean. Water is transported through overland flows or by Ventura County Watershed Protection District (VCWPD) natural and concrete-lined barrancas. Long Canyon, located to the north of the plan area in the hills drains to Brown Barranca, a drainage that is under the jurisdiction of the VCWPD. Brown Barranca is a heavily vegetated earthen ditch that crosses the plan area in a southeasterly direction from Telegraph Road on the north to Wells Road at Blackburn Road on the east.

b. Drainage. The Parklands Specific Plan area consists of approximately 66.7 acres southwest of the intersection of Telephone Road and Wells Road. The plan area is relatively flat, but slopes gently toward Brown Barranca. Brown Barranca is deficient in capacity at SR 126 for large storm flow events (100-year storm), but is adequate for lesser storm events (10-year storm) (DTR Engineering, 2005). Brown Barranca is the main drainage within the plan area and is the only defined regional drainage deficiency listed in the Wells and Saticoy Communities Capital Improvement Deficiency Study (CIDS). Brown Barranca eventually drains to the Santa Clara River. There are no public drainage facilities within the plan area other than Brown Barranca since the remainder of the plan area is currently under agricultural production. Undeveloped peak flows to Brown Barranca under 10-Yr (Q10), 25-Yr (Q25), 50-Yr (Q50) and 100-Yr (Q100) storm events are shown in Table 4.6-1. As indicated, the peak flows range from 93 cubic feet per second (cfs) for the Q10 storm to 192 cfs for the Q100 storm.

c. Flood Hazards. As discussed above under subsection b, Brown Barranca is deficient for the 100-year storm. Within the plan area, Brown Barranca becomes both shallower and narrower between Telegraph Road and Wells Road (DTR Engineering, 2005). It is at this location where the where large storms overtop the barranca and flow across Wells Road and Blackburn Road (DTR Engineering, 2005). Flooding also occurs along Blackburn Road, caused by runoff from the existing mobile home park (DTR Engineering, 2005).

Table 4.6-1
Existing Flows to Brown Barranca

	Storm Event			
	Q10	**Q25**	**Q50**	**Q100**
Peak Flow (cfs)	93	120	150	192

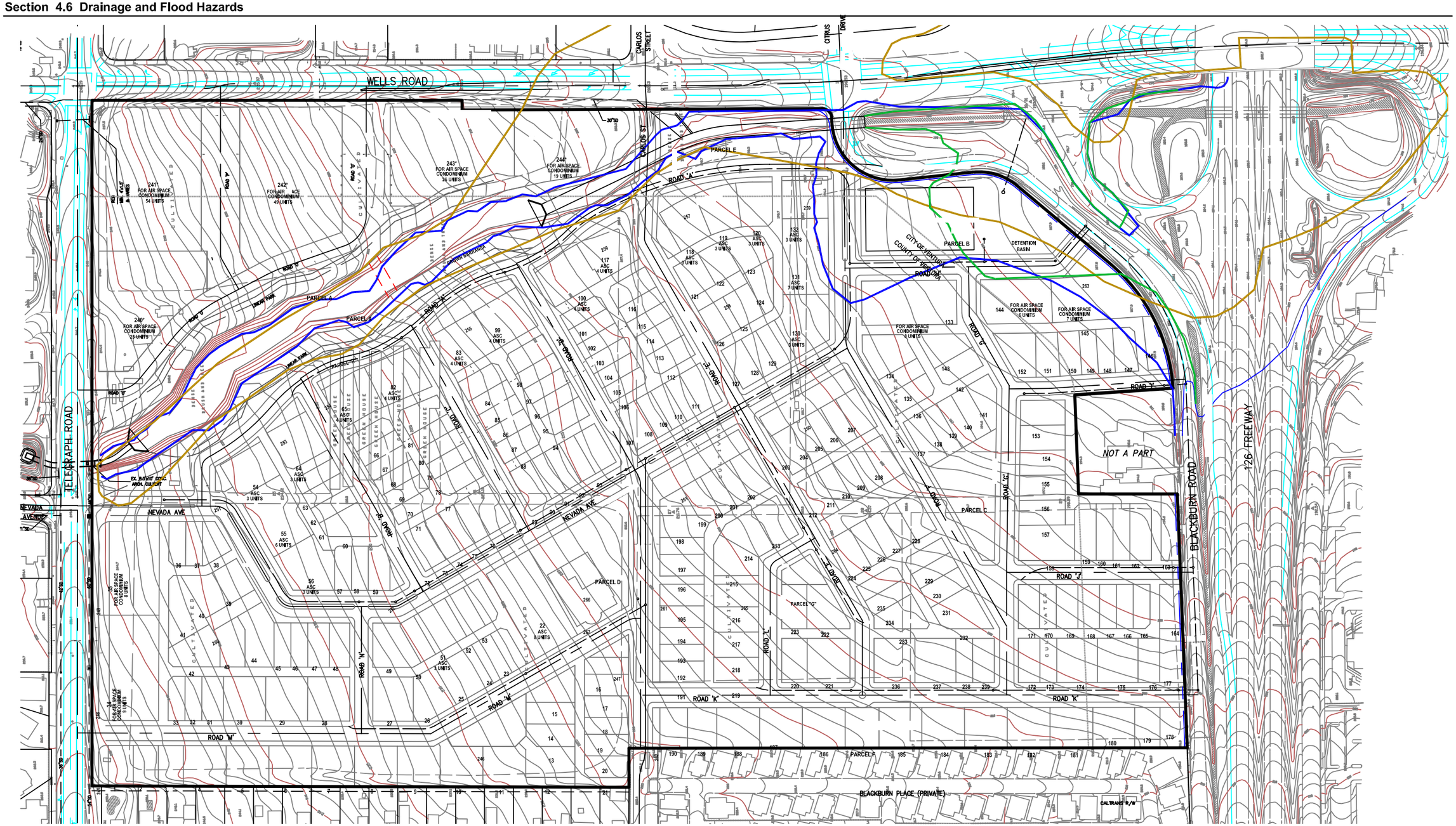
Source: Hawks and Associates, Parklands Development Detention Design, Revised July 27, 2008.

The Federal Emergency Management Agency (FEMA) has defined the 100- and 500-year flood hazard areas within the City of Ventura through the publication of the Flood Insurance Rate Maps (FIRM), which establish base flood heights and flood zones for 100-year and 500-year storm events. The 100-year storm event is defined as a storm that has a 1% probability of occurring in any given year, while a 500-year storm event has a 0.2% chance of occurring in any given year. A "floodplain", also called a flood zone, is the lowland adjacent to a river, lake or ocean and is designated by the frequency of the flood that is large enough to cover it. For example, a 100-year floodplain will be covered by a 100-year flood, while a 500-year floodplain will be covered by a 500-year flood. The "floodway" is the channel of a river or stream plus any adjacent floodplain that must be kept free of encroachment so that the 100-year flood can be conveyed without substantial (greater than one foot) increases in flood heights. Planning policies typically prohibit urban development, activities, and structures within the floodway that will alter the floodway's ability to convey the 100-year flood. However, development is not usually restricted within the 500-year flood zone because of the low probability of flood occurrence.

Portions of the plan area are located within the 100-year and 500-year floodplains. Currently, flooding in the plan area vicinity occurs along Blackburn Road caused by runoff from the existing mobile home park and Wells Road to the east and Blackburn Road to the south from barranca deficiencies (DTR Engineering, 2005). The Brown Barranca Hydraulic Study indicates that double and triple box culverts at Blackburn Road and SR 126 are inadequate to carry existing 100-year storm flows (Omrun, 2006). Three box culverts within this portion of the study area contribute a combined overflow of 1,503 cubic feet/second (see Table 2, Brown Barranca Hydraulic Study Appendix E). Figure 4.6-1 shows three different flood boundaries, which are described below.

1) The <u>effective 100-year flood plain</u> is the mapped flood plain on record with FEMA and FIRM, indicating that a 100-year flood not only affects Blackburn Road, but Wells Road and areas easterly, as well as SR 126 and a portion of the plan area (see Figure 4.6-1);

2) The <u>updated 100-year flood plain</u> is the flood plain as defined by updated mapping and hydraulic calculations, which indicates that flooding affects primarily Blackburn Road and the southeastern portion of the plan area (see Figure 4.6-1); and



100-Year Flood Hazard

Figure 4.6-1

Basemap Source: Padre Associates, Inc., April 2007.

3) The proposed 100-year flood plain is the flood plain with implementation of the project and associated modifications to drainage (see Figure 4.6-1).

The plan area is not located within a dam inundation zone, as indicated in the Saticoy Wells Community Plan Background Report (2006).

4.6.2 Impact Analysis

a. Methodology and Significance Thresholds. Potential impacts to drainage runoff quantity and quality are based on comparison of the proposed uses and their locations relative to the existing uses. Flood hazard analysis was conducted pursuant to engineered maps showing the effective, updated and proposed 100-year flood plain (DTR Engineering, August 2008). The proposed drainage facilities for these projects are to be designed to the acceptance and satisfaction of the City of Ventura, and the VCWPD. Hydrology and water quality effects of the proposed Specific Plan are considered significant if the project would:

- *Change absorption rates, drainage patterns or the rate and amount of surface runoff in a manner that would cause an exceedance of storm drain system capacity*
- *Be in a flood hazard area, based on the FIRM maps*
- *Cause a discharge into surface waters that would adversely alter surface water quality (e.g., temperature, turbidity)*
- *Place within a 100-year flood hazard area structures that would impede or redirect flood flows*

Water quality effects were considered in the initial study; however, significant effects were not identified. Please see the initial study in Appendix A for a discussion of water quality issue areas and compliance with the National Pollutant Discharge Elimination System (NPDES) and Stormwater Quality Urban Impact Mitigation Plan (SQUIMP).

b. Project Impacts and Mitigation Measures.

Impact HYD-1 Development under the Parklands Specific Plan would increase storm water flow from the plan area due to increased impervious surfaces. However, the project includes Low Impact Development (LID) stormwater treatment designs and a detention basin sized to ensure that post development flow rates to Brown Barranca do not exceed pre-development flow rates. The project would result in increased downstream velocities within an existing concrete channel; however, the velocity increases are confined to a concrete channel. Therefore, the impact relating to increased stormwater flows and channel velocities within Brown Barranca would be Class III, *less than significant*.

Increased Stormwater Flows. The plan area is an infill site surrounded by an established urban environment. Storm runoff is calculated for the 67-acre plan area as a whole and pro-rated by area to the 13-acre portion east of Brown Barranca and the 54-acre portion west of the barranca (Hawks & Associates, July 27 2008). Runoff from the 13-acre portion of the plan area

would be treated with Low Impact Development (LID) techniques as required under the City's MS-4 stormwater permit prior to discharge to Brown Barranca. LID Techniques are aimed at reducing runoff and improving the quality of stormwater runoff through natural systems as opposed to engineered structures. Infiltration through vegetation and soil allows for uptake and capture of urban pollutants such as mercury, selenium, TCE, PCE and radionuclides, similar to the way that wetlands serve to cleanse water. In addition, flowing water is collected and slowed within gravel trenches and vegetated swales to allow for infiltration of water, as well as sediment collection. Overflows are piped to larger detention systems where the water will be slowly released or infiltrate to the ground. Some of the features used in the Parklands Specific Plan include the following.

- Directing street runoff through perforated curbs to open grass swales.
- Depressed turf areas to collect street and building runoff functioning as mini-detention areas.
- Open vegetated swales and native plant restoration areas along the edges of Brown Barranca to intercept overland flows before they sheet flow to the barranca.
- Permeable pavers on sand, decomposed granite, and open cell pavers to provide infiltration, filtration and sediment dropout.

Runoff from this 13-acre portion of the site would not exceed the pre-development flow rates of the entire plan area as indicated in Table 4.6-2.

Table 4.6-2
Existing and Post-Project Discharges to Brown Barranca

	Storm Event			
	Q10	**Q25**	**Q50**	**Q100**
Existing Brown Barranca Storm Flows (cfs)				
Peak Flow (all 67 acres)	93	120	150	192
Proposed Conditions (cfs)				
13-acre peak flow (cfs) LID treated with discharge direct to Brown Barranca	29	33	39	48
54-acre peak flow LID treated with discharge direct to Brown Barranca	25	25	25	25
54-acre peak flow LID treated and detained with metered discharge to Brown Barranca	38	56	86	117
Total Proposed Peak Flow (cfs)	**92**	**114**	**150**	**190**

Source: Hawks and Associates, Parklands Development Detention Design, Revised July 27, 2008.

The southwestern portion of the plan area (west of Brown Barranca) is comprised of 54 acres. Runoff from this portion of the plan area would likewise be treated with LID design features

designed to reduce sediment transport and eliminate urban pollutants prior to discharge to both Brown Barranca and a detention system that is designed to hold some runoff within the plan area such that peak post-development discharges would not exceed peak pre-development discharges. The basin would be designed to mitigate increased runoff from the entire site (all 67 acres) and would capture all flows greater than a Q10 by implementing metered discharge at pre-development flow rates.

Up to 25 cfs would flow from the southwestern 54-acre portion of the plan area to Brown Barranca, bypassing the detention basin as delivered through the LID stormwater treatment system. The LID stormwater treatment system consists of a network of open vegetated swales with infiltration trenches at parkways, depressed turf areas, gravel trenches and permeable pavers within service ways, allowing for percolation of stormwater into the ground. These systems also contain an overflow pipe such that during saturated conditions, overflow water is conveyed through an underground system to Brown Barranca (up to 25 cfs) or to the detention basin. The LID system would serve to slow the water, increase infiltration to the ground, remove sediment, and biofilter urban pollutants such as petroleum hydrocarbons.

Within Ventura County, developments are required to detain water on-site to ensure that post-project discharge rates do not exceed pre-project discharge rates. The reason for detention is to reduce the potential for downstream flooding by releasing flows slowly as the peak water runoff subsides elsewhere in the vicinity. Table 4.6-2 shows how the discharges from the northeast 13-acre portion of the plan area and the southeast 54-acre portion of the plan area would be discharged under each of the four storm scenarios. Post development discharge rates would not exceed pre-development discharge rates under any of the four scenarios. Therefore, because proposed post-development discharge rates will not exceed pre-development discharge rates, the potential for adverse effects from increased stormwater flows would be less than significant.

Increased Downstream Velocities. The proposed project includes culverting of a 725 linear foot segment of Brown Barranca upstream of the Blackburn Road undercrossing. The culvert section is being installed for two purposes. The first is to alleviate existing flooding in the vicinity of Blackburn Road due to a 304 cfs flow deficiency at Blackburn Road during a 100-year storm, which results in flooding along Blackburn Road. The second is to allow for extension of Carlos Street within the plan area, eventually continuing westward through the existing neighborhood and through the Hansen Property to fulfill the objective of connecting Wells Road and Saticoy Avenue pursuant to Figure 4.3 of the 2005 General Plan Chapter "Our Accessible Community."

The existing double box culvert at Blackburn Road is deficient during a 100-year storm event. Currently, a 100-year storm event generates flows of 304 cfs more than the 1,300 cfs capacity of the existing double box culvert (Omrun Engineering, 2006). Expanding the culvert at this location to provide a triple box culvert will increase the velocity within the concrete channel south of Blackburn Road and north of Henderson Road by 0.18 feet per second to 1.44 feet per second (see Table 4.6-3).

Table 4.6-3
Post Project Brown Barranca Hydraulic Change

Existing Condition			Post Project Change		
Station		Overflow (cubic feet/second)	Water surface Elevation (feet)	Channel Velocity (feet/second)	Top Width (feet)
8228	S. side of Blackburn Rd.	304.00	0.00	0.00	0.00
8107	N. side of WB SR 126 on-ramp	549.00	0.00	0.01	-0.20
8083	WB SR 126 on-ramp	549.00	0.06	-0.32	6.05
7871	N. side of WB SR 126 off-ramp	549.00	0.58	0.38	-134.33
7826	WB SR 126 off-ramp	549.00	0.46	1.44	-54.07
7771	WB SR 126 off-ramp	650.00	-0.04	0.18	-50.73
7691	N. side WB SR 126	650.00	0.00	0.00	0.00
7667	N. side WB SR 126	650.00	0.00	0.00	0.00
6848	Natural Bottom Channel at Henderson Road outlet *	n/a	n/a	0.00	n/a

Source: Brown Barranca Hydraulic Study (Henderson Road to Telegraph Road, Omrun Engineering, December 2006 (see Appendix E)

** Personal communication Bill Franks, Hawks and Associates, August 2008.*

The velocity increases would occur within the concrete channel and would be slowed by downstream capacity deficiencies, which cause flooding at SR 126 (see Table 2 and Table 6 of the Brown Barranca Hydraulic Study (Henderson Road to Telegraph Road), Omrun Engineering, December 2006 – see Appendix E). Velocities within the concrete channel show no net increase (see Station 7691 and 7667 above in Table 4.6-3) prior to discharge in the natural bottom channel south of Henderson Road.

The velocity increase to 1.44 feet/second slows to no net increase in velocity prior to discharge into the natural bottom channel south of Henderson Road. Therefore, the proposed project would not have the potential to cause erosion or sedimentation downstream due to increased velocities and erosion/sedimentation impacts would be less than significant.

Mitigation Measures. None required. Project design and existing project features would result in no-net increase of discharge rates to Brown Barranca (see Table 4.6-2). Moreover, increased velocities within the concrete channel south of the plan area would have a less than significant impact with respect to increased erosion and sedimentation because the velocity of water would be slowed prior to discharge into the natural bottom channel south of Henderson Road (see Table 4.6-3).

Significance After Mitigation. The impacts to Brown Barranca with respect to increased flows would be less than significant without mitigation due to project design considerations.

Impact HYD-2 Portions of the plan area are located within the 100- year flood plain. The specific plan includes improvements that would alleviate existing flooding within the plan area and would change the boundaries of the existing flood plain. This is a Class II, significant but mitigable, impact.

Portions of the Specific Plan area are currently within the 100-year flood plain (see Figure 4.6-1). Specific plan implementation would place residential development in an area that is currently classified as a 100-year flood zone. The applicant is working with the Ventura County Watershed Protection District to ensure that project drainage improvements in association with VCWPD planned capital improvements alleviate existing deficiencies as well as account for input to the conveyance system from surrounding developments. The proposed improvements would alleviate existing flooding in the vicinity of the plan area caused by deficiencies in Brown Barranca, on Linden Drive to the west and Blackburn road south of the plan area in the vicinity of the mobile home park (DTR Engineering, October 2005). However, because the applicant is proposing to place residences in what is currently designated as a 100-year floodplain (see Figure 4.6-1 effective floodplain), a Letter of Map Revision (LOMR) must be obtained from FEMA indicating the revised 100-year flood plain. The final design of the improvements for the Barranca would be coordinated with the VCWPD and submitted to FEMA. If the design is acceptable to FEMA, a conditional LOMR can typically be granted during the design phase. The final map revision occurs when the physical improvements have been completed to the barranca and accepted for map revision.

Mitigation Measures. The following mitigation measure would reduce the potential for adverse effects from construction of housing in an area that is currently designated as a 100-year flood plain.

HYD-1 Letter of Map Revision. Prior to issuance of building permits, a Letter of Map Revision (LOMR) from FEMA shall be obtained and the final development shall be sited to assure that no structures are placed within the redefined 100-year Flood Zone.

Significance after Mitigation. Implementation of the above mentioned mitigation in accompaniment of project design features would reduce potential impacts due to flood hazards to less than significant.

c. Cumulative Impacts. Development of the proposed Parklands Specific Plan, in conjunction with other development in the Ventura area, would continue to disturb areas with the potential to affect hydrology and drainage. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add more than 8,300 dwelling units, as well as about 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development.

Hydrological impacts related to cumulative development would be controlled through compliance with national and local programs that protect water quality, in addition to regulations of local authorities such as the City of Ventura and the Ventura County Watershed Protection District. This project is being designed to alleviate existing flooding hazards and to

accommodate flows from existing [Mobile Home Park and Linden Drive Terminus (Hawks and Associates, 2005)] and proposed neighboring developments (UC Hansen Trust) such that the combined effect during a storm does not cause exacerbated flooding hazards. In this manner, cumulative effects of this project and other future developments will have a less than significant impact with respect to hydrology and drainage.

4.7 LAND USE and PLANNING

This section summarizes the discretionary land use approvals needed in order to facilitate the proposed project, including the proposed annexation, specific plan, and tentative tract map, as well as the possible effects associated with those approvals.

4.7.1 Setting

The Parklands Specific Plan is proposed within the City of Ventura and the City is acting as the lead agency, with discretionary approval over the Specific Plan, Tract Map and subsequent permits. As discussed in the project description, a portion of the site lies under the jurisdiction of the County of Ventura and would require annexation to the City. The plan area is designated in the General Plan as neighborhood low, specified at a density of 0-8 units per acre. The parcels under City jurisdiction are zoned R-1-7 Single Family Residential, while the parcels under County jurisdiction are zoned AE-40 Agriculture Exclusive -40 Acres. As indicated in Section 2.0 *Project Description*, the proposed project would require the following discretionary approvals.

<u>Required Discretionary City Approvals</u>

- *Annexation, Case No. A-327 for the following three parcels totaling 54.36 acres*
  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*
- *Specific Plan Approval, Case No. SP-6*
- *Zone Change for City designated parcels (R-1-7 to SP-6) and prezoning for County designated parcels (SP-6), Case No. Z-916*
- *General Plan Amendment AO-227 to amend Figures 3.5 and 4.3 of the General Plan to allow the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the short term, while retaining the future widening to arterials standards in the long term.*
- *Tentative Tract Map S-5632*
- *Design Review, Case No. ARB-2985*
- *Planned Development Permit, Case No. PD-861*

<u>Discretionary Approvals Required from Other Agencies</u>

- *Ventura County Local Agency Formation Commission - LAFCo approval of reorganization, including annexation to the City of Ventura for the following three parcels totaling 54.36 acres, with simultaneous detachment of the same area from the Ventura County Resource Conservation District and the Ventura County Fire Protection District*
  - *089-0-012-014 (21.11 acres)*
  - *089-0-012-016 (6.83 acres)*
  - *089-0-012-018 (26.42 acres)*
- *Ventura County Watershed Protection District approval of modifications to Brown Barranca*
- *California Department of Fish and Game Streambed Alteration Agreement*
- *U.S. Army Corps of Engineers 404 permit*
- *Caltrans Encroachment Permit for any work in the SR 126 right-of-way*

a. Regulatory Policy Consistency. Pursuant to CEQA Guidelines Section 15125(d), an EIR shall discuss any inconsistencies with applicable general plans and regional plans. The proposed project includes development of 499 dwelling units, 25,000 square feet of commercial development, a 6,560 square foot community center, and 11.62 acres of greenspace. The project is regionally significant pursuant to CEQA Guidelines Section 15206. The EIR discusses whether the project is consistent with applicable policies of the Air Quality Management Plan in Section 4.2 *Air Quality*. The City of Ventura, Local Agency Formation Commission (LAFCo) and Southern California Association of Governments (SCAG) also have plans and policies that would be applicable to the proposed Parklands Specific Plan. These agencies are described below.

City of Ventura. The City of Ventura is the lead agency and will have discretionary approval over the majority of project components. As listed on the previous page, these approvals include approval of the specific plan and tract map with approval of permits for planned development and design review, annexation, prezoning and zone change, as well as General Plan Amendment.

The project would involve pre-zoning of the three parcels by the City of Ventura to SP-6 and a zone change for the remaining five parcels from R-1-7 to SP-6. The prezoning is conditional upon approval of the annexation and will become effective immediately upon annexation if the annexation is approved by LAFCo. The prezoning will provide for the SP-6 designation, which would implement the pre-zoning and convert the property from the County's existing AE- 40 Agriculture Exclusive-40 Acres zoning designation. Secondly, the specific plan and a vesting tentative map would have to be approved by the City along with design review and planned development permits. Approval of the specific plan and map would be conditioned upon Ventura County Local Agency Formation Commission (LAFCo) approval of the annexation of the 54.36 acres now in the County. A General Plan amendment (AO-227) would also be required to amend Figures 3.5 and 4.3 of the General Plan to allow the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the short term, while retaining the future widening to arterials standards in the long term.

Local Agency Formation Commission. The Ventura County LAFCo is a responsible agency and would have discretionary authority to approve the annexation proposal. The State of California possesses the exclusive power to regulate boundary changes, which means that no local government has the right to change its own boundary without State approval. The Legislature has prescribed a "uniform process" for boundary changes for both cities and special districts that is now embodied in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.). This Act delegates the Legislature's boundary powers to local agency formation commissions (LAFCos).

The Ventura LAFCo is responsible for reviewing and approving proposed jurisdictional boundary changes in Ventura County, including the annexation and detachment of territory to and/or from cities and most special districts, incorporations of new cities, formations of new special districts, and consolidations, mergers, and dissolutions of existing districts. In addition, LAFCos must review and approve contractual service agreements, conduct service reviews, and determine spheres of influence for each city and district.

In addition to the Cortese-Knox-Hertzberg Act, the Ventura LAFCo has adopted local policies that it considers in its review of projects. The LAFCo also enforces the County's Guidelines for Orderly Development. A complete listing of policies that LAFCo considers in its review of proposed boundary changes can be found in the LAFCo website (www.ventura.lafco.ca.gov).

Southern California Association of Governments (SCAG). Pursuant to public resources code Section 21083(d), SCAG reviews EIRs of projects of regional significance for consistency with regional plans per the CEQA Guidelines Section 15125(d) and Section 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

b. Relationship Between Local Regulatory Plans. The City's General Plan and Zoning Ordinance are the broadest planning tools applicable to the plan area. However, these planning tools are superseded by plans designed specifically to cover smaller geographic areas that include the plan area. The proposed Parklands Specific Plan is the primary guidance document for development within the plan area. The proposed Parklands Specific Plan would set the land use policies and standards to guide future development within the plan area. It presents solutions to planning issues and is used to facilitate agency and public review of potential environmental impacts of Parklands. When development projects affecting all or a part of the Parklands plan area are reviewed by the City, the planning staff will use the Parklands Specific Plan as the means and measure of reviewing the project. Individual projects would be evaluated for conformance with its development standards, which will specifically supersede relevant portions of the City's zoning ordinance. It is noted that the Parklands plan area is within the Wells-Saticoy Community plan area; however, policies and standards in the Parklands Specific Plan will take precedence over more general policies and plans applied throughout the Wells-Saticoy Community plan area. Moreover, the Wells-Saticoy Community Plan is still under development and is thus not currently applicable. In situations where policies or standards relating to a particular subject have not been provided in the Parklands Specific Plan, the existing policies and standards of the 2005 General Plan and zoning ordinance would apply.

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. Pursuant to the initial study analysis, a significant impact would occur if the project were inconsistent with the General Plan, Zoning Ordinance, or an adopted specific/community plan.

b. Project Impacts and Mitigation Measures.

Impact LU-1 The proposed Parklands Specific Plan implements policies and actions of the 2005 General Plan and provides development standards specific to the plan area that will supersede portions of the zoning ordinance. The Parklands Specific Plan would become the primary guidance document and would not conflict with other regulatory planning documents. This is a Class III, *less than significant impact* with respect to policy consistency.

The 2005 General Plan designates the plan area as "Residential Low" (0-8 dwelling units/acre). The plan area encompasses approximately 67 acres; therefore, the Residential Low designation would allow a maximum of 538 dwelling units. The project involves the development of up to 499 dwelling units, 25,000 square feet of commercial and a 6,560 square foot community center. The applicant is proposing a specific plan that would rezone the plan area to SP-6 with T-3.1 (Neighborhood Edge), T3.2 (Neighborhood General) and T4.6 (Urban General Corridor) designations, consistent with the intent of the original zoning for residential development. The proposed specific plan is consistent with the intent of the 2005 General Plan to maximize development in areas of the City where infill is possible, prioritizing infill development. Although a portion of the plan area would need to be annexed into the City, the unincorporated areas of the project constitute an "island" surrounded by City jurisdiction. Provided that the requested zone change is approved, the specific plan would be consistent with City zoning, and the development code contained in the proposed Parklands Specific Plan would supersede current Zoning Code requirements.

The plan area is included within the boundaries of the Wells Saticoy Community Plan work efforts. This community plan is currently in draft form and the Specific Plan has been undertaken concurrently but has been designed consistent with the draft Wells Saticoy Community Plan. However, it should be noted that at this time, the Community Plan is a draft document that currently has no legal weight. If the Parklands Specific Plan is adopted in advance of the community plan, the final Community Plan will need to consider and be consistent with the Specific Plan.

The proposed Parklands Specific Plan is consistent with the vision of the 2005 General Plan as it would create an urban infill neighborhood with a variety of housing types, walkable streets interconnected with the existing neighborhoods, enhancement and preservation of Brown Barranca. In addition, the project would create a mixed-use area east of Brown Barranca adjacent Wells Road at Telegraph Road incorporating commercial and live work uses within the Wells Corridor.

The plan area is considered under "Sphere of Influence/Other Infill/Neighborhood Centers" in the predicted development intensity & pattern table in the 2005 General Plan (Table 3-2 in the "Our Well Planned Community" chapter). A total of 1,050 residences are predicted for the Wells/Saticoy area. Current pending applications for the Saticoy Wells Area include 908 residential units (Saticoy Wells Housing Buildout, September 2005). Thus, the 499 units accommodated under the proposed specific plan would bring the total to 1,407 units. Therefore, with the proposed project, planned and pending development within the Saticoy Wells area exceeds the number of predicted residences by 357 residential units. However, the predictions of future development in the 2005 General Plan are not development caps, either citywide or for specific areas of the City. Rather, they were merely estimates of future development used for analytical purposes. Furthermore, development predictions of the 2005 General Plan included 8,300 residential units through 2025, and the addition of 499 residential units would not exceed the total development projections for the City through 2025.

The Parklands Specific Plan is a planning and regulatory tool enforceable under Government Code Section No. 65450. Generally specific plans are legally enforceable to implement a City's or County's general plan through the development of policies, programs, and regulations that

provide an intermediate level of detail between the general plan and individual development projects. The authority to prepare and adopt specific plans and the requirements for their contents are set forth in the California Government Code, Section 65450 through 65457. The standards contained in the Parklands Specific Plan are enforceable to the same extent as the standards contained in the Zoning Ordinance or City Form Based Codes. The Parklands Specific Plan implements the City's 2005 General Plan Vision by implementing the following Vision Policies.

Our Prosperous Community. The Goal of Chapter 2 of the General Plan is to create a favorable economic and social climate that attracts substantive businesses to Ventura, and provides housing for the full range of workforce households at all income levels. The 2005 General Plan policies and actions that are pertinent to the Parklands Specific Plan include:

Policy 2B: *Make the local economic climate more supportive of business investment.*

Action 2.6: *Encourage intensification and diversification of uses and properties in districts, corridors, and neighborhood centers through the assembly and responsible use of vacant and underutilized parcels.*

Action 2.8: *Carry out City Housing Element programs to provide housing to all segments of the local workforce.*

Consistency: The Parklands Specific Plan directs changes to an underutilized site that is currently in agricultural flower production and is incompatible with the adjacent and surrounding residential neighborhoods due to the use of herbicides and pesticides for flower production. The Parklands Specific Plan would facilitate growth as envisioned under the 2005 General Plan Scenario 1 by promoting infill type development within the City through annexation of the three contiguous County parcels totaling 54.36 acres that are surrounded by the City jurisdiction on all four sides. The Parklands Specific Plan brings a wide range of housing choices, a mixed-use neighborhood, retail and services, recreational and potential civic uses to an area planned for intensification in the 2005 General Plan along the Wells Road Corridor. This type of development was prioritized over expansion into the Sphere of Influence areas lying outside of the overall City boundary. The proposed specific plan is consistent with the vision for Our Prosperous Community.

Our Well Planned Community. Chapter 3 of the General Plan calls for a well-planned approach to managing growth that facilitates new jobs, homes, stores and services without (a) traffic gridlock, (b) "cookie cutter" tract houses, and (c) housing prices that make San Buenaventura unaffordable to working families. Pertinent 2005 General Plan policies and actions include:

Policy 3A: *Sustain and complement cherished community characteristics and values.*

Consistency: The Parklands Specific Plan furthers General Plan Policy 3A by requiring that Parklands be designed and built as an attractive mixed use, primarily residential neighborhood of varied housing types compatible with surrounding residential and commercial neighborhoods.

Action 3.2: *Enhance the appearance of districts, corridors, and gateways (including views from highways e.g. SR 126) through controls on building placement, design elements, and unobtrusive directional signage.*

Action 3.6: *Expand and maintain the City's urban forest and thoroughfare landscaping, using native species in accordance with the City's Park, Irrigation and Landscape Guidelines.*

Policy 3B: *Integrate uses in building forms that increase choice and encourage community vitality.*

Consistency: As set out in Policy 3B, Parklands provides a variety of housing types that will accommodate and attract a wide range of household types and income levels producing a diverse and well-rounded resident population. Such a group of homeowners is vital to the service needs in the City. Parklands' assortment of building types provides opportunities for live/work, commercial, neighborhood-serving retail, and home occupation. Furthermore, Parklands' transect-based distribution of uses and Traditional Neighborhood Design (TND) of individual blocks, interconnected streets, inviting public realm, and variety of building types encourages community vitality by providing a place for its residents to walk, bicycle, play, and interact in the public realm.

Action 3.9: *Adopt new development code provisions that designate areas within districts and corridors for mixed-use development that combines businesses with housing, and focuses on the redesign of single-use shopping centers and retail parcels into walkable, well connected blocks, with a mix of building types, uses, and public and private frontages.*

Consistency: The Parklands Neighborhood Center at the intersection of Wells Road and Telegraph Road is the embodiment of Action 3.9, wherein it accommodates a mix of 173 Courtyard and Live/Work units and up to 25,000 square feet of convenience retail. The buildings of the Neighborhood Center enhance the pedestrian character of the public realm and ensure that its buildings fit into the surrounding neighborhood by varying their size and massing, while providing visually and functionally appealing residential, commercial, and retail frontages. The Neighborhood Center is connected to the neighborhoods on the westerly side of Brown Barranca by a pedestrian and bicycle bridge. The Neighborhood Center is also directly across Telegraph Road from the recently completed senior center, encouraging seniors to utilize retail and commercial amenities without having to drive. Likewise, pedestrians, cyclists, and roller-bladers using the Linear Park trail can stop in the Neighborhood Center, relax, and enjoy a snack, refreshment, and conversation.

Policy 3C: *Maximize use of land in the City before considering expansion.*

Action 3.14: *Utilize infill development to the extent possible to fulfill the Housing Element.*

Action 3.15: *Adopt new Form Based Code provisions that ensure compliance with Housing Element objectives.*

Consistency: The plan area is an infill site, surrounded on all sides by residential development, strip commercial and existing urban transportation corridors along Telegraph and Wells Roads and SR 126. The proposed residential density is in compliance with its underlying General Plan land use designation of Neighborhood Low (up to 8 du/acre). As detailed in the Development Standards of Parkland's Regulating Plan, the site plan would complement and continue the existing characteristics of the community. Attached housing would be located at the major intersection of Telegraph and Wells Road and along segments of those arterials. The proposed design of the area between Telegraph Road and Blackburn Road/ SR 126 reflects the 2005 General Plan's policy of locating neighborhoods near existing or planned transportation, circulation and services. The proposed plan is consistent with the vision for Our Well Planned Community.

Our Accessible Community: Chapter 4 of the General Plan is the City Circulation Element. The opening paragraph, which summarizes the transportation philosophy of the City, states: "Our Goal is to provide residents with more transportation choices by strengthening and balancing bicycle, pedestrian and transit connections within the City and the surrounding region." The following policies and actions of the 2005 General Plan are addressed in the specific plan:

Policy 4A: *Ensure that the transportation system is safe and easily accessible to all travelers.*

Action 4.6: *Require new development to be designed with interconnected transportation modes and routes to complete a grid network connecting with all parts of the City.*

Action 4.10: *Modify traffic signal timing to ensure safety and minimize delay for all users.*

Action 4.12: *Design roadway improvements and facility modifications to minimize conflict between pedestrians, bicycles and automobiles.*

Policy 4B: *Help reduce dependence on the automobile.*

Action 4.17: *Promote the development and use of recreational trails as transportation routes to connect housing with civic services, schools, retail, entertainment and employment.*

Action 4.21: *Require new development to provide pedestrian and bicycle access and facilities as appropriate, including connected paths along the shoreline and watercourses.*

Consistency: The Parklands Specific Plan accommodates the diverse needs of all transportation modes - pedestrians, bicyclists, and motor vehicles - while creating peaceful and livable spaces. The plan includes a General Plan Amendment (AO-227) to reclassify the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector in the short term, while retaining the future widening to arterials standards in the long term. The additional right of way that is not devoted to automobiles will accommodate bike lanes, parallel parking and a

central median. Similar treatment will occur on Telegraph Road adjacent the plan area; however, a 24-foot wide parkway accommodating a meandering bicycle and pedestrian path will also be developed along the north side of Telegraph Road west of Wells Road. The standards of this specific plan and future surrounding development produce a higher quality of life, fewer and shorter motor vehicle trips with greater personal safety and serenity. In particular, the plan provides:

- *Individual blocks, interconnected streets and inviting open spaces that encourage pedestrian activity while providing multiple, traffic-diffusing routes.*
- *Sidewalks on all streets, paseos, rosewalks, and greenways enabling on average a five minute walking time between residences and commercial, recreation and civic facilities.*
- *Pedestrian and bike paths along Brown Barranca from Telegraph to Wells Road plus interior walkways with connection to off-site neighborhoods.*
- *A circulation design that enables a connection between Parklands and Saticoy Avenue and nearby existing and future neighborhoods, e.g. Hansen Trust property.*
- *Connection of Wells Road to the Parklands interior via a full service bridge at Carlos Street and a pedestrian bridge over Brown Barranca.*
- *Connection of Blackburn Avenue to Telegraph Road via the internal street network.*
- *Narrow streets designed specifically to slow traffic.*
- *Class I and Class II Bikepaths as key components of interior and off-site connectors.*

Policy 4C: *Increase transit efficiency and options.*

Action 4.28: *Require all new development to provide for citywide improvements to transit stops that have sufficient quality and amenities, including shelters and benches to encourage ridership.*

Consistency: The specific plan implements Action 4.28 because of it includes amenities and is located immediately adjacent to South Coast Area Transit (SCAT) Routes 10 and 11. Taking advantage of this proximity, Parklands introduces a new SCAT bus stop and turnout on the south side of Telegraph Road (for eastbound buses). Parklands' "Traditional Neighborhood Design" is aimed at decreasing vehicle miles traveled (VMT) by providing streets and bike racks that encourage people to walk or bicycle to the bus stop. Plan area streets would be designed to be memorable places with ample landscaping, which make walking and cycling a more enjoyable experience.

Policy 4D: *Protect views along scenic routes.*

Action 4.36: *Require development along the following roadways – including noise mitigation, landscaping, and advertising – to respect and preserve views of the community in its natural context: Telegraph Road (east of Victoria Avenue) and Wells Road (between Telegraph Road and Highway 126).*

Consistency: Parklands has been designed to foster views from the primary roads in accordance with Action 4.36. In that regard, Parklands completely avoids the use of sound walls along its Wells Road and Telegraph Road frontages, instead, lining the frontages with a variety of buildings and open spaces. Parklands' buildings have appealing frontages (porches, stoops,

storefronts), which provide direct entry to the dwelling units from the sidewalk, and are designed in a variety of styles (Mediterranean, Craftsman, and Beach Bungalow). The design animates the sidewalk, provides "eyes on the street," and presents street frontages more in character with Ventura's traditional neighborhoods and districts (Midtown, the East and West Neighborhoods, and Downtown). In addition, the specific plan presents pedestrian-scaled block faces to Wells and Telegraph Roads, thereby increasing pedestrian and vehicular access to Parklands' neighborhoods as well as providing passing pedestrians, bicyclists, and motorists with glimpses into its tree-lined streets and inviting open spaces. The specific plan has been laid out to enable views of and access to Brown Barranca and its Linear Park. The specific plan is consistent with the vision for Our Accessible Community.

Our Sustainable Infrastructure. Chapter 5 of the General Plan relates to infrastructure and basic policies for conservation. Policies and actions pertinent to the specific plan include:

Policy 5A: *Street, recreation and residential design contributing to conservation by encouraging walking and biking, and reducing car trips and trip distances.*

Action 5.1: *Require low flow fixtures, leak repair, and drought tolerant landscaping (native species, if possible), plus emerging new water reclamation techniques.*

Policy 5B: *Improve services in ways that respect and even benefit the environment.*

Action 5.5: *Locate new development in or close to developed areas with adequate public services, where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.*

Consistency: Domestic water service is supplied by the City via existing distribution lines in Telegraph Road, Linden Drive, and Blackburn Road. Water and wastewater lines will be located in public rights-of-way. Final facility sizing and precise location of water improvements will be designed in consultation with the City Engineer. Compared to previous row crop uses, Parklands will actually reduce water use and demand.

Action 5.6: *Require project proponents to conduct sewer collection system analyses to determine if downstream facilities are adequate to handle the proposed development.*

Consistency: Parklands contracted with Downstream Services, Inc. to perform a Sewer Capacity Flow Monitoring Study using the City's standard method of analysis. The results of the study determined that no impacts would occur as a result of the development of the specific plan.

Action 5.15: *Establish assessment districts or other financing mechanisms to address storm drain system deficiencies in areas where new development is anticipated and deficiencies exist.*

Consistency: The Parklands Specific Plan would fund storm water facilities on- and off-site in accordance with the Wells-Saticoy CIDs and its own system needs. Also in keeping with Action

5.15, the specific plan would have a self-contained Maintenance Assessment District managed by the City. These facilities would be built in the initial improvements phase so that they would be in place during project construction and prior to the first residential occupancy.

Action 5.16: *Require new developments to incorporate stormwater treatment practices that allow percolation to the underlying aquifer and minimize offsite surface runoff utilizing methods such as pervious paving material for parking and other paved areas to facilitate rainwater percolation and retention/detention basins that limit runoff to pre-development levels.*

Action 5.17: *Require stormwater treatment measures within new development to reduce the amount of urban pollutant runoff in the Ventura and Santa Clara Rivers and other watercourses.*

Consistency: In accordance with Actions 5.16 and 5.17, the specific plan would use storm water management practices that respect the existing hydrology of the site by filtering out pollutants and minimizing the need for larger storm drain pipes by collecting and treating rainwater and directing overflow to low points in parkway planting strips, medians, and passive greens. Cleansed water and overflows are then released into Brown Barranca, greatly reducing the amount of urban pollutant runoff that ends up in the Santa Clara River. The proposed plan is consistent with the vision for Our Sustainable Infrastructure.

Our Active Community: Chapter 6 of the General Plan - the Recreational Element of the City - provides for the addition and enhancement of Ventura's parks and open spaces to provide enriching recreation options for the entire community.

Policy 6A: *Expand the park and trail network to link shoreline (in this case, Barranca banks), hillside, and watershed areas.*

Action 6.1: *Develop new destination and adjacent neighborhood parks, pocket parks, and community gardens appropriate to citizen needs.*

Action 6.2: *Require higher density development to provide pocket parks, tot lots, seating plazas, bicycle racks and rest points and other serene green spaces.*

Action 6.3: *Development plans include trails, as appropriate.*

Consistency: The specific plan includes development of 11.62 acres of greenspace including pocket parks, neighborhood parks, the Brown Barranca linear park as well as other types (see Table 2-5 in Section 2.0, *Project Description*. Further, the specific plan focuses on and enhances Brown Barranca as its key natural recreation and transport amenity. Overall, the specific plan would result in 17% of the plan area developed as greenspace.

Action 6.9: *Require dedication of land identified as part of the City's Linear Park System in conjunction with new development.*

Consistency: The specific plan meets Action 6.9 by preserving and dedicating to the City a Linear Park along both sides of Brown Barranca. The Linear Park is an extension of the existing Linear Park on the north side of Telegraph Road. The specific plan is consistent with the vision for Our Active Community.

Our Involved Community. Chapter 10 of the General Plan encourages civic engagement and community collaboration in order to build consensus about City advance planning.

Policy 10A: *Work collaboratively to increase citizen participation in public issues.*

Action 10.1: *Conduct focused outreach efforts to encourage all members of the community – including youth, seniors, special needs groups, and non-English speakers - to participate in civic discourse and planning processes.*

Action 10.2: *Induce public participation by seeking out citizens in their own neighborhoods and gathering places such as schools, houses of worship, and public spaces, making such involvement more convenient and likely to be implemented.*

Consistency: In accordance with the 2005 General Plan, civic engagement and community collaboration have been proactively pursued in a series of public meetings in the Wells Road Neighborhood. The preparers of the specific plan received neighbor input on local community issues and made plan revisions based thereon. A variety of community outreach tools were utilized to maximize local neighborhood involvement, including but not limited to the following:

- *Community workshops and design charrettes.*
- *Local mailing address and door-to-door notice and invitations to participate to obtain as much community input as possible.*

The proposed specific plan is consistent with the vision for Our Involved Community.

Mitigation Measures. The proposed specific plan implements the policies and actions of the 2005 General Plan, and provided that the General Plan Amendment is approved for reclassification of the Wells Road segment between Telegraph Road and Carlos Street to de-emphasize from arterial to collector, no mitigation is required.

Significance After Mitigation. The impact with respect to consistency with City of Ventura land use policies would be less than significant without mitigation.

Impact LU-2 The proposed Parklands Specific Plan would require a boundary reorganization with annexation of three parcels from the County to the City. Provided that the boundary reorganization/annexation is approved subsequent approvals could move forward. This is a Class III, *less than significant* impact with respect to land use policy conflicts.

The Ventura County LAFCo would need to approve annexation of three parcels totaling 54.36 acres to the City of Ventura, with simultaneous detachment of the same area from the Ventura County Resource Conservation District and the Ventura County Fire Protection District, prior to any plan area construction. Applicable LAFCo policies pertaining to the needed reorganization are discussed below.

Conformance with Local Plans and Policies. Unless exceptional circumstances are shown, LAFCo will not approve a proposal unless it is consistent with the applicable general plan and any applicable specific plan. In this case, the proposed specific plan implements policies and actions of the City of Ventura 2005 General Plan. The specific plan is consistent with the applicable policies and actions of the 2005 General Plan.

Guidelines for Orderly Development. LAFCo encourages proposals that involve urban development or that result in urban development to include annexation to a city wherever possible. The proposed specific plan would incorporate an isolated pocket of County designated land to the City with provision of utilities and services by the City. The Parklands Specific Plan is consistent with the Guidelines for Orderly Development.

Greenbelts. LAFCo will not approve a proposal for a city that is in conflict with any Greenbelt Agreement unless exceptional circumstances are shown to exist. The proposed project does not involve development of a greenbelt. Moreover, the plan area is already designated as residential low in the City of Ventura 2005 General Plan, indicating planned development. The project poses no conflicts with greenbelt agreements.

Agricultural and Open Space Preservation. LAFCo will approve a proposal for a change of organization that is likely to result in the conversion of Prime agricultural land or open space land only if it finds that the proposal will lead to planned, orderly, and efficient development. For a development to be deemed planned, orderly, and efficient, all of the following criteria must be met: (1) the territory involved is contiguous with lands developed with an urban use or that have received approvals for urban development; (2) the territory is likely to be developed within 5 years and has been pre-zoned for non-agricultural use; (3) insufficient non-Prime agricultural land or vacant land exists within the existing boundaries of the agency that is planned and developable for the same general type of use; (4) the territory is not subject to voter approval for the extension of services or changing of land use designations; and (5) the proposal will have no significant adverse effects on the integrity of other Prime agricultural or open space lands.

The 2005 General Plan FEIR identified the plan area as Prime Farmland, as defined by the U.S. Soil Conservation Service Important Farmlands Inventory system, and identified the conversion of Prime Farmland into non-agricultural use as a significant impact. Under Scenario 1 - Intensification/Reuse Only in Section 4.2 of the 2005 General Plan EIR, the plan area was included as one of a number of properties already designated for non-agricultural use under the previous Comprehensive Plan. During adoption of the 2005 Ventura General Plan, the City Council considered the conversion of agricultural lands within the City's sphere of influence and determined that public benefits of the General Plan outweigh certain unavoidable adverse environmental effects, including the conversion of agricultural land. A Statement of Overriding Consideration was adopted. Therefore, the project would not have any significant impact to

agricultural lands beyond that identified in a prior impact assessment and documented in the certified 2005 General Plan FEIR.

School Capacity. LAFCo will not favor a change of organization where any affected school district certifies that there is no sufficient existing school capacity to serve the territory involved. As discussed in the Initial Study (Appendix A), although many schools are at or near capacity, the school district is working toward resolving overcrowding through construction of a new middle school in the vicinity of the plan area, as well as exploring potential new school sites and expansion of facilities at existing sites. Mitigation of adverse effects on capacity at schools is accomplished through payment of School Mitigation Fees at issuance of building permits pursuant to State Law. Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, mitigation is not required and the impact is considered less than significant.

Annexation of Unincorporated Island Areas. Any approval of a proposal for a change of organization for an area of 40 acres or more will be conditioned to provide that the proceedings will not be completed until and unless a subsequent proposal is filed with LAFCo initiating proceedings for the change of organization of all unincorporated island areas that meet the provisions of Government Code Section 56375.3. This policy means that LAFCo will not approve annexations of 40 acres or more unless the City has filed an application to annex all of the island areas in the City, which include eight separate islands in the Montalvo area totaling about 55 acres. Because the plan area encompasses more than 40 acres, the City would presumably need to file an application to annex the eight islands in Montalvo before the LAFCo will consider annexation of the plan area.

Mitigation Measures. No mitigation is required, though the City would presumably need to apply for annexation of eight island areas in Montalvo before annexation of the plan area would be considered by the LAFCo. The boundary reorganization and General Plan Amendment are consistent with the LAFCo Guidelines for Orderly Development and with the City's vision under the 2005 General Plan.

Significance After Mitigation. The impact would be less than significant without mitigation.

Impact LU-3 The proposed Parklands Specific Plan was evaluated for consistency with applicable SCAG policies and could be considered consistent. Existing mitigation measures as summarized in Table ES-1 would reduce environmental impacts to a level that is less than significant. The proposed Specific Plan has a Class III, *less than significant* impact due to policy consistency.

The proposed Parklands Specific Plan would allow for development of up to 499 dwelling units, 25,000 square feet of commercial space, a 6,560 square foot community center, 11.62 acres of greenspace including parks and a barranca preserve, and associated infrastructure. Southern

California Association of Governments (SCAG) considers the project regionally significant and provided a list of policies to consider for consistency. The following analysis discusses consistency with these policies.

Growth Forecasts. SCAG policies relative to growth management include the following policies.

3.01 The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.

3.02 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

According to SCAG's 2008 Regional Transportation Plan (RTP) population forecasts (adopted May 8, 2008), the projected 2010 population for the City of Ventura is 112,044. For the purposes of this analysis, it is presumed that the construction of 499 residential units would be completed in 2010. Based on the current average household size in the City (2.6 persons/ household), this number of units would generate 1,297 new residents. When added to the current population of 108,261 (California Department of Finance, 2008), this would bring the overall population to 109,558. This is well within the projected citywide population of 112,044 for 2010. Therefore, development of the 499 residences would not in itself generate population exceeding regional forecasts. The specific plan could also generate some employment based on allowable retail of up to 25,000 square feet. This amount of general commercial retail development would generate about 92 employees (based on an average of 271 square feet of other retail/service per employee- Table 12A, SCAG Employee Density Study, 2001).

Growth Management Policies Related to the RCPG Goal to Improve the Regional Standard of Living. The following policies are intended to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms t be more competitive , strengthen the regional strategic goal to stimulate the regional economy.

3.04 Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.

3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.

3.06 Support public education efforts regarding the costs of various alternative types of growth and development.

3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

The proposed specific plan provides that some live/work units may be developed; however, the work space within the live/work units would count towards the 25,000 square feet of commercial space. Therefore, the live/work units would not result in additional employment opportunities; however, the diversity of employment generated by the proposed specific plan would be increased as artists or other independent professionals would be more likely to utilize the live/work units rather than the general retail or service commercial types of positions that would also be generated by the specific plan. The specific plan offers a variety of housing types and ranges in prices with 12 very low income units and 32 moderate income units in addition to market rate condominiums and single family residences.

The proposed specific plan would be constructed in an area that is surrounded by existing residential and commercial development and bounded on the south by SR 126. The plan area is situated in the eastern portion of the City and infrastructure extensions need only be brought into the plan area from adjacent development on Telegraph Road and Wells Road. Plan area improvements would benefit the overall community with street improvements on Wells Road and Telegraph Road in addition to development of 11.62 acres of greenspace. The specific plan has been designed to implement the vision of the 2005 General Plan by intensifying development in an area where services are already available. Moreover, the specific plan would streamline the future development process by dictating a plan for cohesive yet flexible residential and commercial development pursuant to the development code that was created for the specific plan. The Parklands Specific Plan appears consistent with these SCAG Growth Management Policies to Improve the Regional Standard of Living.

Growth Management Policies Related to the RCPG Goal to Improve the Regional Quality of Life. The growth management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that area aesthetically pleasing and preserve the character of communities enhance the regional strategic goal of maintaining the regional quality of life.

3.11 Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions.

3.12 Encourage existing or proposed local jurisdictions'' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled (VMT), an d create opportunities for residents to walk and bike.

3.13 Encourage local jurisdictions' plans that maximize the use of exiting urbanized areas accessible to transit through infill and redevelopment.

3.14 Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.

3.15 Support local jurisdictions'' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.

3.16 Encourage developments in and around activity centers, transportation corridors, under utilized infrastructure systems, and areas needing recycling and redevelopment.

3.17 Support and encourage settlement patterns, which contain a range of urban densities.

3.18 Encourage planned development in location s least likely to cause adverse environmental impact.

3.19 Support policies and actions that preserve open space areas identified in local, state, and federal plans.

3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.

3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.

3.22 Discourage development, or encourage the use of special design requirements, n areas with steep slopes, high fire, flood, and seismic hazards.

3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.

The policies for improving the regional quality of life generally relate to providing a balance of jobs and housing, facilitating alternative transportation modes, and avoiding development in environmentally sensitive areas. Please see above analyses regarding jobs/housing balance. The plan area is in an area that is well served by an existing road network. In addition, the specific plan provides for a mix of uses and facilitates alternative transportation modes by providing for sidewalks and walking and bike paths as well as access to transit service. Finally, as discussed throughout the EIR, the specific plan would generally avoid impacts to environmental resources. The plan area is relatively flat, is not planned as open space, is not subject to unusual geologic hazards, and lacks known cultural resources. Most of the plan area also lacks significant biological resources, while the specific plan involves enhancement of much of the riparian corridor that crosses through the plan area. For these reasons, the specific plan could be found to be consistent with applicable policies relating to improving the regional standard of living.

Growth Management Policies Related to the RCPG Goal to Provide Social, Political, and Cultural Equity. Goals to develop urban forms that avoid economic and social polarizations promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society.

> *3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
>
> *3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

Policies for providing social, political, and cultural equity generally relate to the provision of housing and providing access to services for all members of society. The specific plan would facilitate the development of up to 499 residential units and would not adversely affect public services. Moreover, the plan would provide a variety of housing types including some very low income, moderate income, as well as market rate condominiums and single family homes. In addition, the plan would provide for both professional and service commercial employment opportunities within the corridor area. Consequently, the plan could be found to be consistent with applicable policies relating to providing social, political, and cultural equity.

Air Quality Chapter. Air Quality goals related to the proposed specific plan include the following.

> *5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fess) so that options to command and control regulation can be assessed.*
>
> *5.11 Through the environmental document review process, ensure that plans at all level so government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

The air quality chapter policies relate to identification of programs and actions to reduce air pollutant emissions and ensuring that environmental documents consider air quality and related issues. As discussed in Section 4.2 *Air Quality*, the City's Air Quality Ordinance (Ordinance 93-37) requires developers of projects that generate emissions exceeding VCAPCD significance thresholds to pay air quality impact fees that are placed in an air quality mitigation fund that is used to offset project emissions through implementation of regional air quality programs. The EIR analyzes the project's air quality impacts as well as relating impacts in the areas of traffic and land use. The mixed use traditional neighborhood design, along with Class I and II bike lanes, walkable blocks, and varied greenspaces are intended to facilitate greater pedestrian and bicycle use in the plan area. Similar improvements westward towards Saticoy Avenue on Telegraph Road as part of the UC Hansen Trust project will continue the pattern and promote connectivity between these two developments through an existing neighborhood.

These design features in addition to a new bus stop and payment of fees to an Air Quality Mitigation Fund (AQ-2(b)) that can be used for programs such as, enhanced public transit service, vanpool programs/subsidies, rideshare assistance programs, clean fuel programs, improved pedestrian and bicycle facilities, and park-and-ride facilities. Thus, no inconsistency with applicable air quality policies is anticipated.

Open Space and Conservation Chapter. Goals related to the proposed specific plan include the following.

9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region.

9.02 Increase the accessibility to open space lands for outdoor recreation.

9.03 Promote self sustaining regional recreation resources and facilities.

9.04 Maintain open space for adequate protection to lives and properties against natural and manmade hazards.

9.05 Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire, and other known hazards, and areas with limited access for emergency equipments.

9.08 Develop well managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.

Open space and conservation policies relate to the provision of adequate land for outdoor recreation, maintenance of open space to guard against natural disasters, and the development of well-managed ecosystems. The proposed specific plan would provide for 11.62 acres of greenspace, including parks and a preserve around the Brown Barranca. In addition, the project applicant would be required to pay recreation fees consistent with City ordinance for the project's contribution to the development of citywide parks. Moreover, the plan area is not subject to any natural hazards that cannot be avoided through implementation of proposed mitigation measures, while the specific plan calls for the preservation of most of the disturbed riparian corridor that crosses through the site as well as restoration of the corridor and revegetation with native plantings. As such, the project could be found to be consistent with applicable open space and conservation policies.

Water Quality Chapter Recommendations and Polity Options. Goals related to the proposed specific plan include the following.

11.02 Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.

11.07 Encourage water reclamation throughout the region where t is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

Water quality policies are aimed at the development of watershed management programs and encouraging water reclamation where feasible. The proposed specific plan incorporates infiltration swales, biofilters, pervious pavements, and stormwater detention. The project is being designed to control runoff in a manner that will reduce post-project runoff to at or below existing undeveloped conditions. As feasible, plan development would utilize recycled water for landscape irrigation. As such, the project could be found to be consistent with applicable water quality policies.

Regional Transportation Plan. Applicable goals include the following.

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*

RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*

RTP G3 *Preserve and ensure a sustainable regional transportation system.*

RTP G4 *Maximize the productivity of our transportation system.*

RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*

RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*

Transportation policies are aimed primarily at the efficient use of the transportation system and maximizing of mobility, accessibility, and reliability. As noted previously, the plan area is well-served by an established road network; therefore, plan implementation would facilitate efficient use of the existing system. In addition, the plan would provide facilities such as sidewalks, walking paths, and bike paths that facilitate alternative transportation modes. Therefore, the project could be found to be consistent with applicable transportation policies.

Growth Visioning. The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity, or income class. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices.*

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments which provide a mix of uses.*

GV P2.3 Promote "people scaled" walkable communities.
GV P2.4 Promote the preservation of stable, single-family neighborhoods.

Principle 3: Enable prosperity for all people.
GV P3.1 Provide, in each community, a variety of housing types.
GV P3.2 Support educational opportunities that promote balanced growth.
GV P3.3 Ensure environmental justice regardless of race, ethnicity or income class.
GV P3.4 Support local and state fiscal policies that encourage balanced growth.
GV P3.5 Encourage Civic engagement.

Principle 4: Promote sustainability for future generations.
GV P4.1 Preserve rural, agricultural, recreational, and environmentally sensitive areas.
GV P4.2 Focus development in urban centers and existing cities.
GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
GV P4.4 Utilize "green" development practices.

Compass Growth Visioning policies are aimed at a variety of topics, including fostering mobility, livability, prosperity, and sustainability. As described earlier, the Parklands Specific Plan has been designed to implement the goals and visions of the General Plan to promote a variety of New Urbanist Principles creating a dense residential noted located along exiting corridors of transportation , including existing bus routes, SR 126 and Telegraph Road. Parklands is intended to catalyze revitalization of the Wells Saticoy village neighborhood through development of a series of parks, bike lanes and pedestrian connections that provide linkages between existing and future development. The residential units provide a variety of housing types in different economic ranges and diversity of designs oriented to the streets and scaled for pedestrian comfort. The commercial units and potential for live/work development introduces the potential for support commercial such as coffee shops, delicatessen or similar uses with potential for offices or studios associated with professionals and artists.

Mitigation Measures. The proposed project includes mitigation that reduces impacts to a level that is less than significant for all issue areas. Table ES-1 in the Executive Summary contains all of the mitigation measures for the project as they pertain to aesthetics, air quality, cultural resources, biological resources, hazards and hazardous materials, hydrology and water quality, noise and traffic. There are no unavoidably significant impacts that result from the project. Therefore, the project could be found to be consistent with applicable growth visioning principles and strategies.

Significance After Mitigation. Environmental effects of the project such as aesthetic, air quality, biological, cultural, hydrological, hazards and hazardous materials, noise, and transportation would all be reduced to a level that is less than significant. Moreover, the proposed project appears to be consistent with applicable relevant policies of the 2005 General Plan, County Guidelines for Orderly Development and the SCAG growth, planning and transportation policies. The impacts with respect to policy consistency would remain less than significant without mitigation.

4.8 NOISE

This section addresses the impact of the noise generated by the proposed project on nearby noise-sensitive land uses, as well as the effect of current and pending future noise levels on the proposed project. This section is based on a Noise Impact Study conducted by Padre Associates, Inc. April 2007, and a Noise Barrier Analysis conducted by Rincon Consultants, Inc. 2008). These studies are included in Appendix G.

4.8.1 Setting

a. Overview of Sound Measurement. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

The sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources such as industrial machinery. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period.

The actual time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise metrics – the Day-Night average level (Ldn) and the Community Noise Equivalent Level (CNEL) - recognize this fact by weighting hourly Leqs over a 24-hour period. The Ldn is a 24-hour average noise level that adds 10 dB to actual nighttime (10 PM to 7 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the Ldn, except it also adds a 5 dB penalty for noise occurring during the evening (7 PM to 10 PM).

b. Sensitive Receptors. Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, and libraries are most sensitive to noise intrusion and therefore have more stringent noise exposure targets than manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. The plan area is abutted by single family residential on the south, west, and across Telegraph Road to the north. Other sensitive receptors in the vicinity include a senior assisted living complex north of the plan area adjacent the northern boundary of Telegraph Road at Wells Road, and a private school across Wells Road to the east of the plan area.

c. Noise Sources. Noise sources are those that emit noise which can be heard from nearby properties. Noise sources often include roadways, construction sites, industrial uses, etc. Noise sources in the vicinity of the plan area are primarily generated by cars on adjacent roadways including the SR 126, Telegraph Road, and Wells Road. Existing noise levels in the vicinity of the plan area were measured for the Noise Impact Study and are shown in Table 4.8-1.

Table 4.8-1
Existing Noise Levels in the Vicinity of the Plan Area

Location	Time Period	Noise Level dBA (Leq)
Near Bonaventure Senior Housing at Telegraph Road	3:35 to 3:50	67.0
Near Las Clinicas Medical Building at Wells Road	3:55 to 4:15	76.1
Near Country Estates Mobile Home Park at Blackburn Road	4:23 to 4:43	74.2

Source: Padre Associates, Inc., Noise Impact Study, April 2007.

d. Regulatory Setting. Guidelines for noise compatible land use, based upon the California Office of Planning and Research (OPR) Noise Element Guidelines, are shown on Figure 4.8-2. The objective of noise compatibility guidelines is to provide the community with a means of judging the noise environment that it deems to be generally acceptable.

Denotation of a land use as "clearly acceptable" implies that the highest noise level in that band is the maximum desirable for existing or conventional construction that does not incorporate any special acoustical treatment. In general, evaluation of land use that fall into the "normally acceptable," "conditionally acceptable," or "normally unacceptable" noise environments should analyze other potential factors that would affect the noise environment. These include consideration of the type of noise source, the sensitivity of the noise receptor, the noise reduction likely to be provided by structures, and the degree to which the noise source ay interfere with speech, sleep, or to other activities characteristic of the land use.

Ventura Noise Ordinance. The City of Ventura Noise Ordinance (Municipal Code § 10.650) prohibits unnecessary, excessive, or annoying noise in the City. The Ordinance does not

control traffic noise, but applies to all noise sources located on private property including traffic noise. As part of this ordinance, properties within the City are assigned a noise zone based on their corresponding land use. "Noise-sensitive" properties are designated as Noise Zone I; residential properties are designated Noise Zone II; commercial properties are included in Noise Zone III, and industrial/agricultural districts are designated as Noise Zone IV. The Ordinance also limits the amount of noise generated by uses during normal operation that may affect the surrounding areas. Table 4.10-1 shows the allowable noise levels and corresponding times of day for each of the identified noise zones.

Table 4.8-2
Exterior Noise Levels

Time Period	ZONE I	ZONE II	ZONE III	ZONE IV
7 A.M. to 10 P.M.	50 dBA	50 dBA	60 dBA	70 dBA
10 P.M. to 7 A.M.	45 dBA	45 dBA	55 dBA	70 dBA

Source: City of Ventura Municipal Code § 10.650.130B.

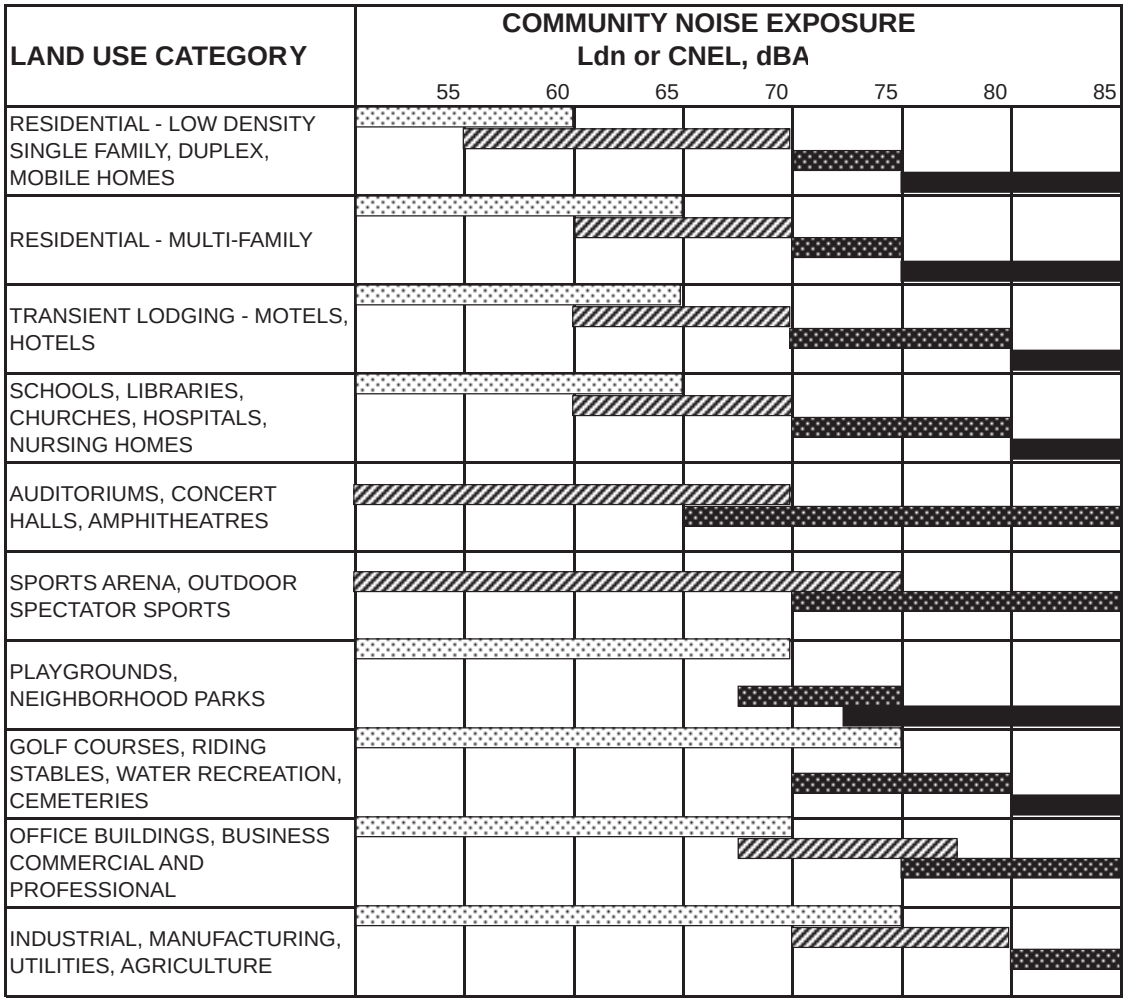
The noise standards shown in Table 4.10-1 apply to any noise-generating activity that exceeds the applicable level for a cumulative period of more than 30 minutes in any hour. For noise levels that last less than 30 minutes, the following standards apply: maximum noise levels equal to the value of the noise standard plus 5 dBA for a cumulative period of no more than 15 minutes in any hour, 10 dBA for a cumulative period of no more than 5 minutes in any hour, 15 dBA for a cumulative period of no more than 1 minute in any hour, or 20 dBA for any period of time. If the ambient sound level exceeds the allowable exterior standard, the ambient levels become the standard.

The following noise standards for interior noise levels apply for all multifamily residential units within Zones I or II. Daytime (7 a.m.–10 p.m.) noise levels shall not exceed 45 dBA and nighttime (10pm-7am) shall not exceed 40 dBA (Section 10.650.130 C.1).

Section 10.650.150 of the Ordinance exempts construction activities from the above standards, provided that they are conducted between 7 A.M. and 8 P.M. Construction activity is permitted between the hours of 8 pm and 7 am, provided that the noise levels do not exceed the standards specified in Table 4.10-1.

City of Ventura General Plan. The City of Ventura 2005 General Plan sets the interior noise standard for habitable rooms of new residences at 45 dBA CNEL (Policy 7E, Action 7.32). The exterior level for usable outdoor recreation space (patios, gardens, etc.) of both new single and multi-family residential structures is 65 dBA CNEL (Policy 7E, Action 7.32).

Action 7.32 also requires an acoustical analysis and mitigation prior to development of any residential development within the 60 dBA CNEL contour and incorporation of appropriate mitigation to reduce noise in residential exterior usable space to 65 dBA CNEL or lower and reduce interior noise levels at residences to 45 dBA CNEL or lower. Additionally, Action 7.33



NORMALLY ACCEPTABLE
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

NORMALLY UNACCEPTABLE
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design

CONDITIONALLY ACCEPTABLE
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

CLEARLY UNACCEPTABLE
New construction or development should generally not be undertaken.

Source: Guidelines for the Preparation and Content of Noise Elements of the General Plan, California Office of Planning and Research, 1998.

Noise Compatibility Matrix

Figure 4.8-1

calls for the construction of sound walls along SR 126 in areas where existing residences are exposed to exterior noise exceeding 65 dBA CNEL.

4.8.2 Impact Analysis

a. Methodology and Thresholds of Significance. The analysis of noise impacts focuses upon the project's impact to surrounding noise-sensitive land uses and the impact of existing noise sources upon residents of the plan area.

Roadway noise impacts were calculated based on project traffic volumes from the traffic report that was prepared for the project in addition to cumulative traffic growth with buildout of the 2005 General Plan at 2025 (roadway noise data sheets included in Appendix G). Noise measurements were taken in the field to calibrate modeled noise levels in the vicinity of the plan area. Traffic was modeled using the Federal Highway Administration Traffic Noise Model® (TNM, ver 2.5) based on data provided by Associated Transportation Engineers (ATE) in the approved traffic report for the project and freeway data provided by Caltrans. Peak hour traffic estimates for the segment of SR 126 near the project site, Wells Road, and Blackburn Road, including the proposed project generated traffic combined with the existing traffic and future traffic generated by cumulative development in the area were used for the TNM® modeling. The future modeled year is 2025.

The TNM® uses algorithms based on speed to calculate the average sound level produced by the three vehicle types of concern (autos, medium-duty trucks, and heavy-duty trucks). The analysis used average speeds of 70 mph for cars 65 mph for medium trucks and 60 mph for heavy trucks on the freeway, 45 to 50 mph for vehicles on the on-and off-ramps, 40 mph for vehicles on Wells Road, and 35 mph for vehicles on Blackburn.

The location of road lanes, existing barriers, and houses were digitized into the TNM® from the AUTOCAD site plans (DTR Engineering, July 2008). Topographical elevations were also taken from the site plans. The results of the noise model and the basic input data files required are attached. The noise model was checked for calibration based on the field noise measurements conducted at the site. The field measurements yielded values that varied from the TNM® calculated level for peak hour by approximately 3.1 to 3.3 dBA. The difference in the measured sound levels and the modeled sound levels can be attributed to the variability of traffic volumes. It is noted that a difference of 3 dBA is just audible, whereas increases of less than 3dBA are not audible to the human ear.

For the purpose of this analysis, a significant impact would occur if growth accommodated under the 2005 General Plan would result in any of the following conditions:

- *Exposure of persons to or generation of noise levels in excess of standards established in the General plan or noise ordinance*
- *Exposure of persons to or generation of excessive ground-borne noise levels*
- *A substantial permanent increase in ambient noise levels above levels existing without the project*
- *A substantial temporary or periodic increase in ambient noise levels above levels existing without the project*

For purposes of defining a "substantial" increase in traffic noise, the Federal Interagency Committee on Noise (FICON) recommendations were used. These are shown in Table 4.8-3.

Table 4.8-3
Significance of Changes in
Operational Roadway Noise Exposure

Noise Level with Project (CNEL)	Significant Impact
< 60 dB	+ 5.0 dB or more
60 – 65 dB	+ 3.0 dB or more
> 65 dB	+ 1.5 dB or more

Temporary or periodic noise increases associated with specific plan implementation would primarily result from future construction activity. A temporary increase in noise is considered "substantial" if it would be in conflict with the City Noise Ordinance, which allows noise-generating construction activity between the hours of 7 AM and 8 PM.

b. Project Impacts and Mitigation Measures.

Impact N-1 **Construction activity associated with development of the specific plan would temporarily generate noise within and adjacent to the plan area. However, given that construction activity would be limited to between the hours of 7:00 AM and 8:00 PM, no violation of the City's Noise Ordinance is anticipated. Therefore, construction impacts are considered Class III, *less than significant.***

Construction activity generates temporary noise levels increases due to the use of heavy construction equipment. Construction typically occurs in several distinct phases, each of which has its own unique noise characteristics. Typical noise levels at a distance of 50 feet from the noise source for each of the major phases of construction are shown in Table 4.8-3.

The noisiest activities associated with construction typically occur during the site preparation (excavation and foundation development) stage. This phase of project construction tends to create the highest construction noise levels because of the use of heavy-duty construction equipment, including trucks, bulldozers, graders, and scrapers. A discussion of impacts associated with construction-related activities follows.

As noted in Table 4.8-4, noise levels associated with heavy equipment used during construction typically ranges from 78 to 88 dBA at 50 feet from the source. Such noise levels can be disturbing, particularly to noise-sensitive uses such as residences, schools, and hospitals. The nearest sensitive receptors are the residential units of the Country Estates Mobile Home Park.

These residences would be within 50 feet of proposed residential development that would occur along the southwestern project boundary. At that distance, maximum noise levels during construction would range from 78 to 88 dBA or slightly higher. Such levels exceed daytime ambient levels in the vicinity of the existing residences and noise associated with construction activity would be audible during grading and construction adjacent to these areas. However, such noise would occur only sporadically and maximum noise levels would occur during only a fraction of the grading period. Section 10.650.150 of the Ventura Noise Ordinance exempts construction activities from the standards, provided that they are conducted between 7 AM and 8 PM. Thus assuming compliance with Noise Ordinance timing restrictions, noise associated with construction activities would not be significant.

Table 4.8-4
Typical Noise Level Ranges at Construction Sites

Construction Phase	Average Noise Level at 50 Feet	
	Minimum Required Equipment On-Site	All Pertinent Equipment On-Site
Clearing	84 dBA	84 dBA
Excavation	78 dBA	88 dBA
Foundation/Conditioning	88 dBA	88 dBA
Laying Subbase, Paving	78 dBA	79 dBA
Finishing and Cleanup	84 dBA	84 dBA

Source: Bolt, Beranek and Newman, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," prepared for the U.S. Environmental Protection Agency, 1971.

Mitigation Measures. All construction within the plan area would be subject to the City Noise Ordinance, which limits noise-generating construction activity to between the hours of 7:00 AM and 8:00 PM. No mitigation required.

Significance After Mitigation. Compliance with Noise Ordinance timing restrictions would ensure noise impacts would remain less than significant. No mitigation required.

Impact N-2 Traffic generated by plan area development would increase noise levels along roadways in the vicinity of the project site. However, project-related traffic noise impacts along these roadways would be Class III, *less than significant*.

Development facilitated by the proposed specific plan would generate additional traffic in the vicinity of the plan area, which would increase traffic-related noise on area roadways. Roadway noise was modeled pursuant to the TNM analysis (Appendix G) of traffic-related noise impacts that would occur from implementation of the proposed specific plan. The study indicated that project-generated traffic would increase noise levels within the vicinity of existing roadways by 0.2 to 0.4 dBA (see Table 4.8-5).

Table 4.8-5
Projected Noise Levels Along Most Affected Roadways

Road Segment	Noise Level Along Roadways (dBA Ldn)				Noise Level Change (dBA)		Significant Project Impact?
	Existing (1)	Existing + Project (2)	Existing+ Year 2025 (3)	Existing + Project + Year 2025 (4)	Change due to Project (2-1)	Cumulative Change (3-1)	
Blackburn Road [a] between Wells Road and Saticoy Avenue.	69.2	69.4	70.7	70.8	+0.2	**+1.6** [b]	No
Wells Road between Telegraph and SR 126	66.3	66.6	67.1	67.3	+0.3	+0.8	No
Telegraph Road between Wells Road and Saticoy Avenue	67.1	67.5	66.9	67.3	+0.4	+0.2	No

Modeled using FHWA TNM ver2.5 Look-Up Tables for a receptor 50 ft from centerline See Appendix G.

[a] *Noise level increases along Blackburn Road also reflect cumulative noise generated along SR 126 because these two roadways are adjacent to each other and the combination of these roadways contributes to the noise environment of affected receptors between Wells Road and Saticoy Avenue.*

[b] *Indicates a significant impact. This significant cumulative impact is discussed at the end of the section under subsection c. Cumulative Impacts.*

Because the 0.2 to 0.4 dBA project generated increase is less than the 1.5 dBA threshold, the project's effect would be less than significant. It is noted that cumulative development, including the proposed project would result in a 1.6 dBA increase along Blackburn Road and SR 126, which exceeds the 1.5 dBA threshold. These cumulative impacts are discussed at the end of the section under subsection c. *Cumulative Impacts*.

Mitigation Measures. None of the study area roadways would experience a significant noise impact due to project generated traffic-related noise. No mitigation required.

Significance After Mitigation. Project-specific impacts would be less than significant for the proposed specific plan without mitigation.

Impact N-3 **Both existing onsite noise levels and projected noise levels adjacent to SR 126 within the plan area exceed the City's "normally acceptable" community noise exposure standards. Since development facilitated by the proposed specific plan would place residential uses in an area where noise levels exceed the City's "normally acceptable" community noise exposure standards, impacts would be Class II, *significant but mitigable*.**

Implementation of the proposed specific plan would facilitate placement of residential units adjacent Blackburn Road and approximately 150 feet from the SR 126 centerline. Noise levels adjacent Blackburn Road in this area are documented as ranging from 70-74 dBA (see tables 4.8-1 and 4.8-5). Single and multi-family residential development is "conditionally acceptable" when ambient noise levels range from 60 to 70 dBA ("conditionally acceptable" means that the development type is generally acceptable if standard noise control techniques are implemented). The majority of the plan area falls within this category; however, residences proposed adjacent the southern plan area boundary and SR 126 could be exposed to ambient noise levels in excess of 70 dBA, which is categorized as "normally unacceptable." Within this noise level range, new construction should proceed only after a detailed analysis of noise reduction requirements and inclusion of noise attenuation features in project design.

Action 7.32 of the City's General Plan requires an acoustical analysis and mitigation prior to development of any residential development within the 60 dBA CNEL contour and incorporation of appropriate mitigation to reduce noise in residential exterior usable space to 65 dBA CNEL or lower and reduce interior noise levels at residences to 45 dBA CNEL or lower. Action 7.28 directs to construct sound wall along SR 126 as funding becomes available. Development of the Parklands Specific Plan would have a potentially significant impact with respect to exposure of residences to noise in excess of normally acceptable levels. Mitigation would be required to address both exterior and interior noise.

Mitigation Measures. Several variations of the sound wall were modeled (see Barrier Analysis in Appendix G) and three different designs were created that would reduce noise levels within exterior usable spaces to below 65 dBA. Construction of a sound wall adjacent to SR 126 is shown on Figure 4.8-2. This figure shows the variable height sound wall, which would need to be 14 -21 feet tall along the southern edge of Blackburn Road. This wall would transition from 14 feet tall opposite the southern boundary of lot 263 (triangle shaped pocket park), to 18 feet tall at the western boundary of Road "I" (see Figure 4.8-2). The wall would continue from the western boundary of Lot "I" at 19 feet tall, transitioning to 21 feet tall and continue to about 75 feet past the western boundary of the plan area (see Figure 4.8-2). It is noted that other wall scenarios, such as a garden wall or a combination garden wall and sound wall would result in a shorter wall adjacent SR 126 (see figures 1 and 2 in the Barrier Analysis contained in Appendix G). However, these other combination walls would also separate the residences from Blackburn Road, creating a walled-in community. Moreover, the only option offering full protection for the existing residence at the southern edge of the plan area is a sound wall that would be constructed along the southern edge of Blackburn Road.

With construction of this 14-21 foot sound wall along the northern edge of the freeway, noise levels in the exterior usable spaces of residential lots in the southern portion of the plan area within 200 feet of Blackburn Road would range from 57-64 dBA CNEL, which is within the City's 65 dBA standard. However, noise levels in interior spaces of second story habitable spaces would exceed the 45 dBA allowable interior standard. Additional attenuation would be required. The following mitigation measures are required to fully reduce the potential for adverse effects to residential receptors to a less than significant level.

N-3(a) **Sound Wall.** Prior to grading permit issuance, the applicant shall incorporate a sound wall along the southeastern boundary of the plan area as indicated on Figure 4.8-2 (Figure 3 of the Barrier Analysis, Rincon Consultants, 2008), or some combination of walls as also indicated on Figures 1 and 2 of the Barrier Analysis (see Appendix G). Construction material, height, and location shall be sufficient, at a minimum, to intercept the freight truck line of sight on SR 126. Adequate wall height and placement shall be determined by the Planning Manager in consideration of the following parameters: (1) CMU wall height, material, and location consistent with Caltrans sound walls within the City; (2) proposed building pad elevations in relation to SR 126; and (3) vertical distance between CMU wall height and lowest roof eave and window.

N-3(b) **Lot 132.** The residence and garage at this location shall be linked with a solid block wall and oriented, such that the exterior usable space is buffered from noise generated along Wells Road.

N-3(c) **Interior Noise Attenuation.** Plans submitted to the Inspection Services Division for purposes of obtaining building permits shall illustrate that residences fronting Telegraph Road, Wells Road, and Blackburn Road/SR 126 shall ultimately be constructed to include the following:

a) Windows facing the street shall be dual pane, laminated with a Sound Transmission Class (STC) rating of at least 40;

b) Windows facing the street on multiple-family structures shall be minimized and non-opening.

c) Exterior walls facing the street shall be constructed of staggered wood studs, or equipped with a resilient channel between the studs and wallboard, or any other wall system with an STC rating of at least 50;

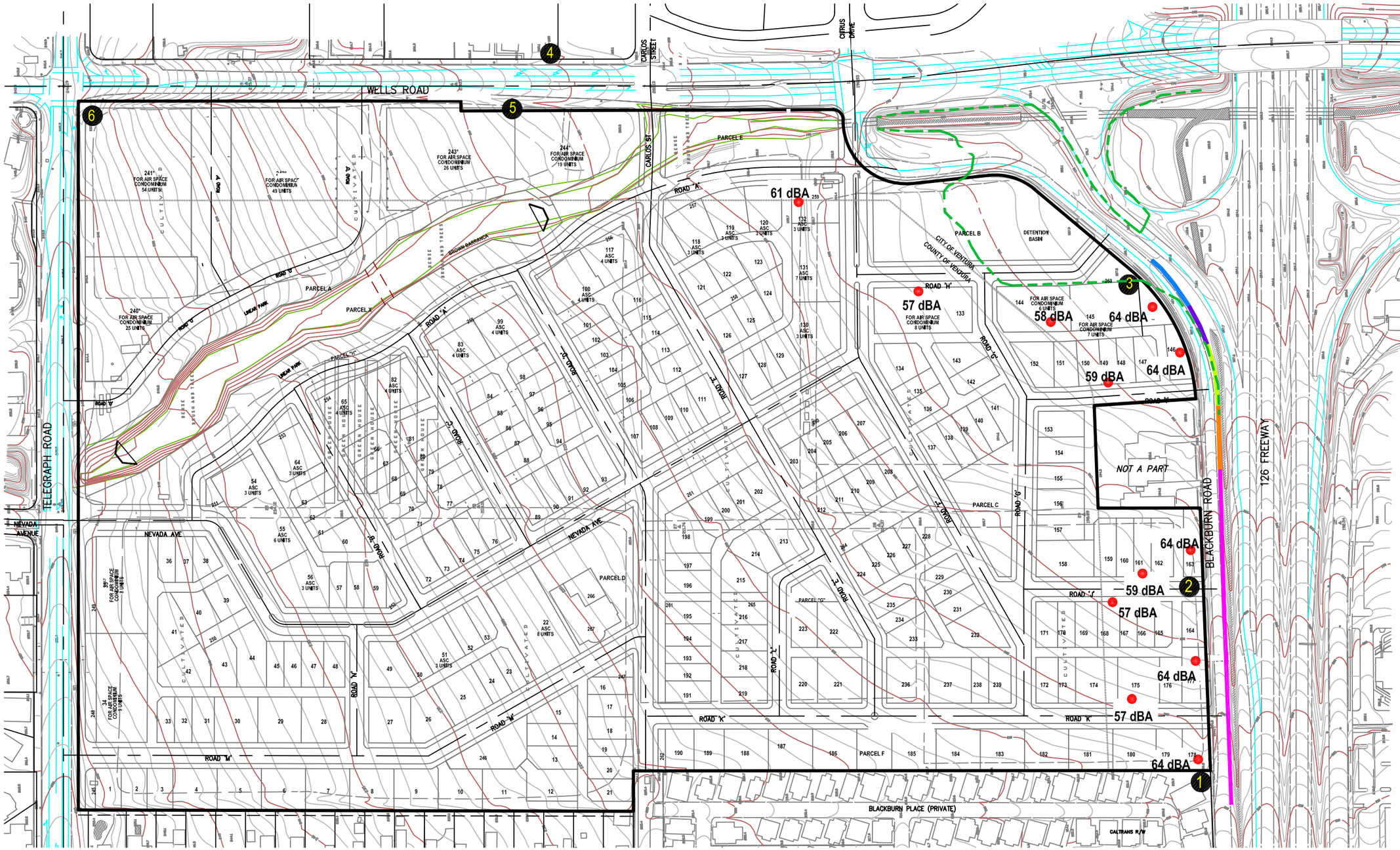
d) Exterior doors facing the street shall be of a sound insulating design with a STC rating of at least 38; and

e) All exterior doors and windows shall be installed with proper weather stripping.

f) Roof construction of concrete tile with 15/32-inch plywood, R-30 batt insulation in the attic, and a layer of ½-inch thick gypsum board separating the attic from living areas;

g) Northernmost homes shall not have courtyard access doors facing Telegraph Road.

N-3(d) **Noise Measurements.** Prior to final building permit inspection of residences facing Telegraph Road, Wells Road and Blackburn Road/SR 126, the applicant shall submit a 24-hour CNEL internal noise measurement for those bedrooms closest to Telegraph Road, Wells



2025 Modeled Noise Levels
Variable Height Soundwall

Figure 4.8-2

Basemap Source: Padre Associates, Inc., April 2007.

Road and Blackburn Road/SR 126 to be reviewed and approved by the Planning Manager. Future noise levels shall be projected based upon measured existing levels.

In the event that the noise measurement and/or projection identifies noise levels that exceed 45 dBA CNEL, the applicant shall develop a contingency plan for additional measures to reduce noise to 45 dBA CNEL or lower. The contingency plan may include, without limitation, the modification of constructed residences with materials/methods that reduce interior noise to 45 dBA CNEL. Prior to occupancy of affected units, the applicant shall obtain approval of the contingency plan from the Planning Manager.

Significance After Mitigation. As indicated in Table 4.8-1, existing noise levels in much of the plan area currently exceed the 65 dBA exterior noise standard for sensitive receptors. Thus, impacts are considered potentially significant. The Noise Impact Study and Barrier Analysis (Appendix G) considered development in accordance with buildout of the General Plan and forecasted traffic levels for the year 2025. With implementation of the above mitigation measures, all exterior usable spaces and interior spaces would be exposed to ambient noise levels that are lower than established noise standards. Therefore, noise impacts would be less than significant. Table 4.8-6 shows the noise levels for each of the studied receptors with and without proposed sound walls.

Table 4.8-6
Mitigated Exterior Noise Levels
Year 2025 + Project Conditions

Lot Number	Existing Noise Level (dBA CNEL)	Year 2025 with Project & Proposed Sound Wall (dBA CNEL)
178	70	64
175	65	57
177	72	64
168	65	57
161	67	59
163	72	64
149	66	59
146	70	64
145	69	64
144	62	58
133	58	57
132	60	61

Source: Appendix G. Barrier Analysis, Rincon Consultants, Inc. 2008

Potential aesthetic impacts associated with construction of a sound wall along the SR 126 frontage are discussed in Section 4.1, *Aesthetics* (under Impact AES-1).

c. Cumulative Impacts. As discussed in Section 3.0, *Environmental Setting*, planned cumulative development associated with buildout of the 2005 General Plan in the City of Ventura would add up to about 8,000 dwelling units, 1.2 million square feet of retail development, 1.2 million square feet of office development, 2.2 million square feet of industrial development, and more than 500,000 square feet of hotel development. Cumulative development in and around Ventura would continue to increase traffic and traffic-related noise along area roadways. As indicated in Table 4.8-5, cumulative traffic on Blackburn Road in combination with SR 126 would result in noise increases of 1.6 dBA, which is greater than the 1.5 dBA threshold for roadways with ambient levels in excess of 65 dBA. The proposed project would contribute traffic and would result in an increase of 0.2 dBA, but would not by itself result in a significant cumulative impact.

In the vicinity of the plan area, sensitive receptors that would be exposed to the noise level increases include an existing residence between the southeastern boundary of the plan area and Blackburn Road, in addition to mobile homes located adjacent the western boundary of the plan area. The mobile homes have an existing block wall that helps to attenuate noise.

Project generated in the southern portion of the plan area is traffic is mostly anticipated to exit onto Wells Road from the Citrus Drive extension (see Figure 6A and 7A of the Traffic and Circulation Study in Appendix H). There are five intersections that will be constructed to connect the southern half of the plan area to the existing roadway network (Roads H, I, J, and K that will intersect with Blackburn Road in addition to the Citrus Drive extension that would intersect with Wells Road). Figure 6A in the Traffic and Circulation Study (appendix H) indicates that of the 140 trips during the A.M. Peak hour utilizing those five intersections, 100 of them will utilize the intersection of Citrus Drive at Wells Road (71%), while 40 of them will utilize the other four Blackburn Road intersections combined (29%). Along Blackburn Road, 14 vehicles will travel westbound past the mobile home during the A.M. peak hour, while four vehicles will travel eastbound past the mobile home park to enter the plan area.

With respect to project additions to SR 126, future traffic volumes are estimated at about 53,000 average daily trips (ADT) at General Plan buildout, while baseline traffic volumes were estimated at 37,000 ADT (General Plan Circulation Element Traffic Study, 2005). The proposed project would contribute 33% of the total project-generated ADT to westbound SR 126 (about 1,800 ADT), which represents about 3% of the future total ADT along SR 126 at General Plan Buildout. The combined project generated traffic increases would cause an increase of 0.2 dBA (see Table 4.8-5). Therefore, though a cumulatively significant noise increase would occur due to traffic along SR 126, the project's contribution is not significant.

Moreover, with construction of a sound wall adjacent the southeastern boundary of Blackburn Road [Mitigation Measure N-3(a)], noise from SR 126 and the interchange would be attenuated at the existing residence. Noise levels after construction of a sound wall, such as that shown on Figure 4.8-2 would be about the same as those that were modeled for either side of the existing residence (see Figure 4.8-2). That property is labeled "NOT A PART" and modeled noise levels on either side are 64 dBA adjacent Blackburn Road, and 59 dBA about 100 feet north of

Blackburn Road within the plan area. Therefore, cumulative impacts would be less than significant after mitigation.

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4.9 TRAFFIC AND CIRCULATION

This section evaluates the impacts of the Parklands Specific Plan on the local circulation system. The information has been summarized from the traffic study prepared for the proposed project by Associated Transportation Engineers, dated September 3, 2008. The traffic study is included in its entirety in Appendix H.

4.9.1 Setting

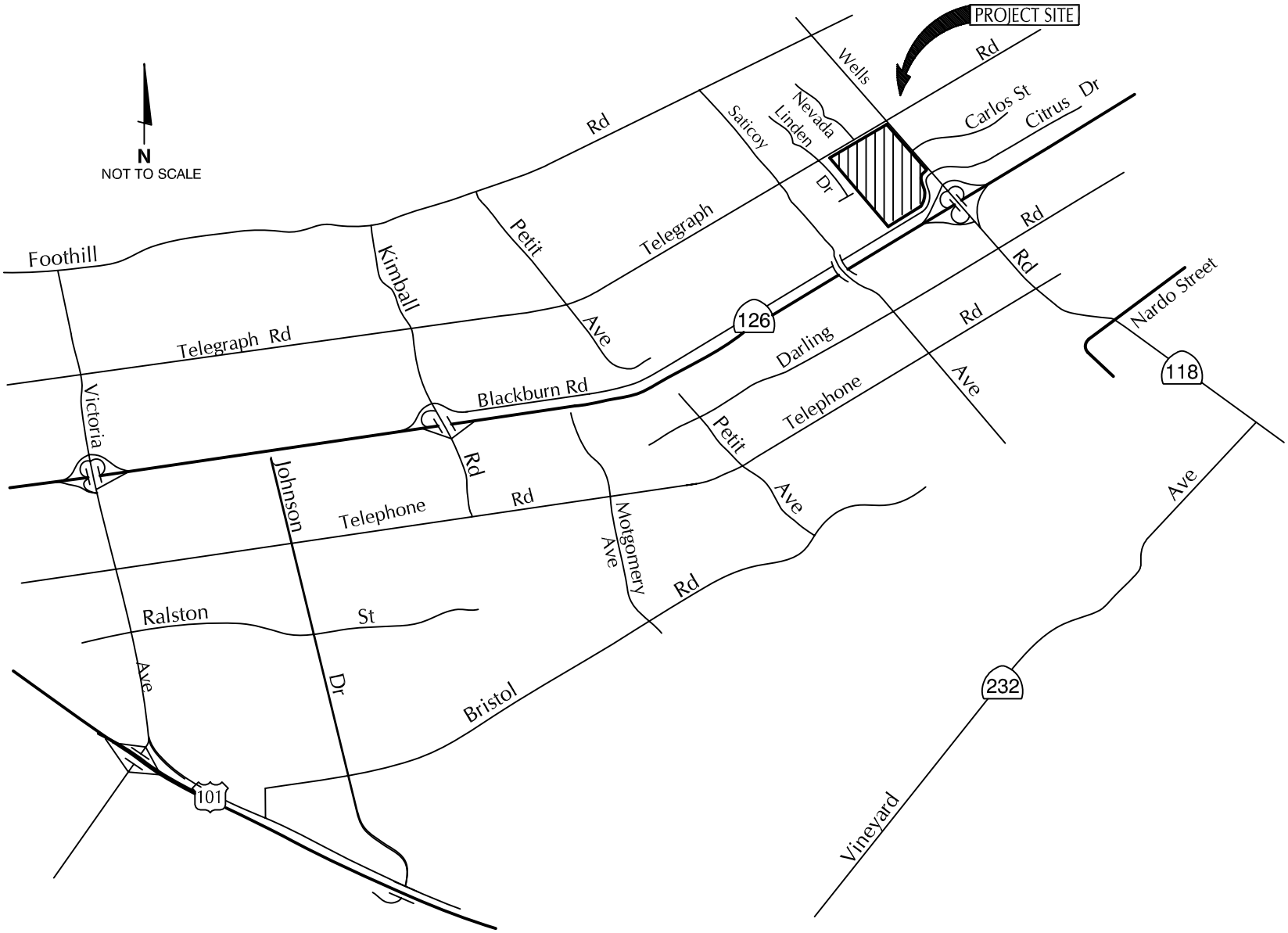
a. Existing Street Network. The plan area is served by a network of highways, arterial streets and collector streets, as shown on Figure 4.9-1. The following text provides a brief discussion of the major components of the study area network.

State Route 126, located south of the plan area, is a four-lane east-west freeway that extends from U.S. Highway 101 to Santa Paula. East of Santa Paula the freeway becomes a conventional highway and extends to Interstate 5 in Santa Clarita (Los Angeles County). State Route (SR) 126 provides regional access to the plan area via the SR 126/Wells Road Interchange. The Wells Road/SR 126 Eastbound Ramp intersection is controlled by a traffic signal, and the Wells Road/SR 126 Eastbound Ramps intersection is controlled by a stop-sign on the off ramp approach.

Wells Road is a primary arterial that extends south from Foothill Road until it becomes Los Angeles Avenue at a point south of Telephone Road in the County of Ventura. South of SR 126 the roadway is also a state facility (SR 118). Wells Road would provide access to the plan area via a total of five street connections. The roadway contains five travel lanes and a raised median from SR 126 to Carlos Street. North of Carlos Street the roadway gradually narrows to two travel lanes and a median two-way left-turn lane. The speed limit adjacent the plan area is 40 miles per hour (mph). The intersections of Wells Road with Telegraph Road, Citrus Drive- Blackburn Road, Darling Road and Telephone Road are signalized. The Wells Road/Carlos Street intersection is controlled by a stop sign on Carlos Street.

Telegraph Road, located along the plan area's north frontage, is an east-west primary arterial that connects the residential and commercial uses in the eastern part of Ventura to downtown. Telegraph Road extends from Main Street through the study area to the City of Santa Paula. It contains four travel lanes east of Kimball Road, and two travel lanes and a median two-way left-turn lane between Petit Avenue and Wells Road. The posted speed limit adjacent the plan area is 45 to 55 mph. The roadway would provide access to the plan area via three street connections. The intersections of Telegraph Road with Kimball Road, Petit Avenue and Saticoy Avenue are controlled by traffic signals. The Telegraph Road/Nevada Avenue intersection is controlled by stop signs on Nevada Avenue.

Telephone Road, located south of SR 126, is a four- to six-lane primary arterial that extends north from Olivas Park Drive to U.S. Highway 101, from where it extends easterly until it terminates at Wells Road. Telephone Road would provide a connection between the plan area and the commercial and residential areas located south of SR 126. The intersections of Telephone Road with Kimball Road, Montgomery Avenue, Petit Avenue, and Saticoy Avenue are controlled by traffic signals.



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Existing Street Network and Project Location

Figure 4.9-1

Blackburn Road, which borders the plan area to the south, is a two-lane undivided local street that serves as a frontage roadway to SR 126. The roadway extends from Kimball Road to Wells Road. It would provide access to the plan area via four street connections.

b. Existing Traffic Volumes and Levels of Service. Because traffic flow on urban arterials is most constrained at intersections, detailed traffic flow analyses focus on the operating conditions of critical intersections during peak travel periods. In rating intersection operations, "Levels of Service" (LOS) A through F are used, with LOS A indicating free flow operations and LOS F indicating congested operations (more complete definitions of levels of service are included in the Technical Appendix). The City considers LOS E acceptable at freeway interchange intersections, and LOS D is acceptable at the Principal Intersections within the City. Principal intersections are intersections that are regularly monitored by the City as a gauge of the operation of the City's circulation system. The City does not have a level of service standard for non-principal intersections, except for those that are located on the CMP' network, at which the CMP level of service standard of LOS E is applicable.

Table 4.9-1 shows the intersections that were analyzed during the A.M. and P.M. peak hours. Figures 4.9-2 and 4.9-3 show the existing A.M. and P.M. peak hour traffic volumes for the study area intersections. The peak hour volumes were obtained from new counts conducted by ATE in September 2005, and from counts provided by City staff. Levels of service for the signalized intersections were calculated based on the "Intersection Capacity Utilization" (ICU) methodology parameters outlined in the City's 2005 Ventura General Plan EIR. Levels of service for the unsignalized intersections were calculated using the Highway Capacity Software (HCS), which implements the Highway Capacity Manual (HCM) methodology to determine the total delay in seconds experienced by vehicles at a stop-controlled intersection, which is then related to a level of service.

Table 4.9-1
Study Area Intersections

1. Foothill Road/Wells Road	10. Wells Road/ SR-126 Eastbound Ramps
2. Telegraph Road/Kimball Road	11. Wells Road/ Darling Road
3. Telegraph Road/Petit Avenue	12. Telephone Road/Kimball Road
4. Telegraph Road/Saticoy Avenue	13. Telephone Road/Montgomery Avenue
5. Telegraph Road/Nevada Avenue	14. Telephone Road/Petit Avenue
6. Telegraph Road/Wells Road	15. Telephone Road/Saticoy Avenue
7. Wells Road/ Carlos Street	16. Telephone Road/Wells Road
8. Wells Road/ Citrus Drive-Blackburn Road	17. Wells Road/Nardo Street
9. Wells Road/ SR-126 Westbound Ramps	18. Los Angeles Avenue/Vineyard Avenue

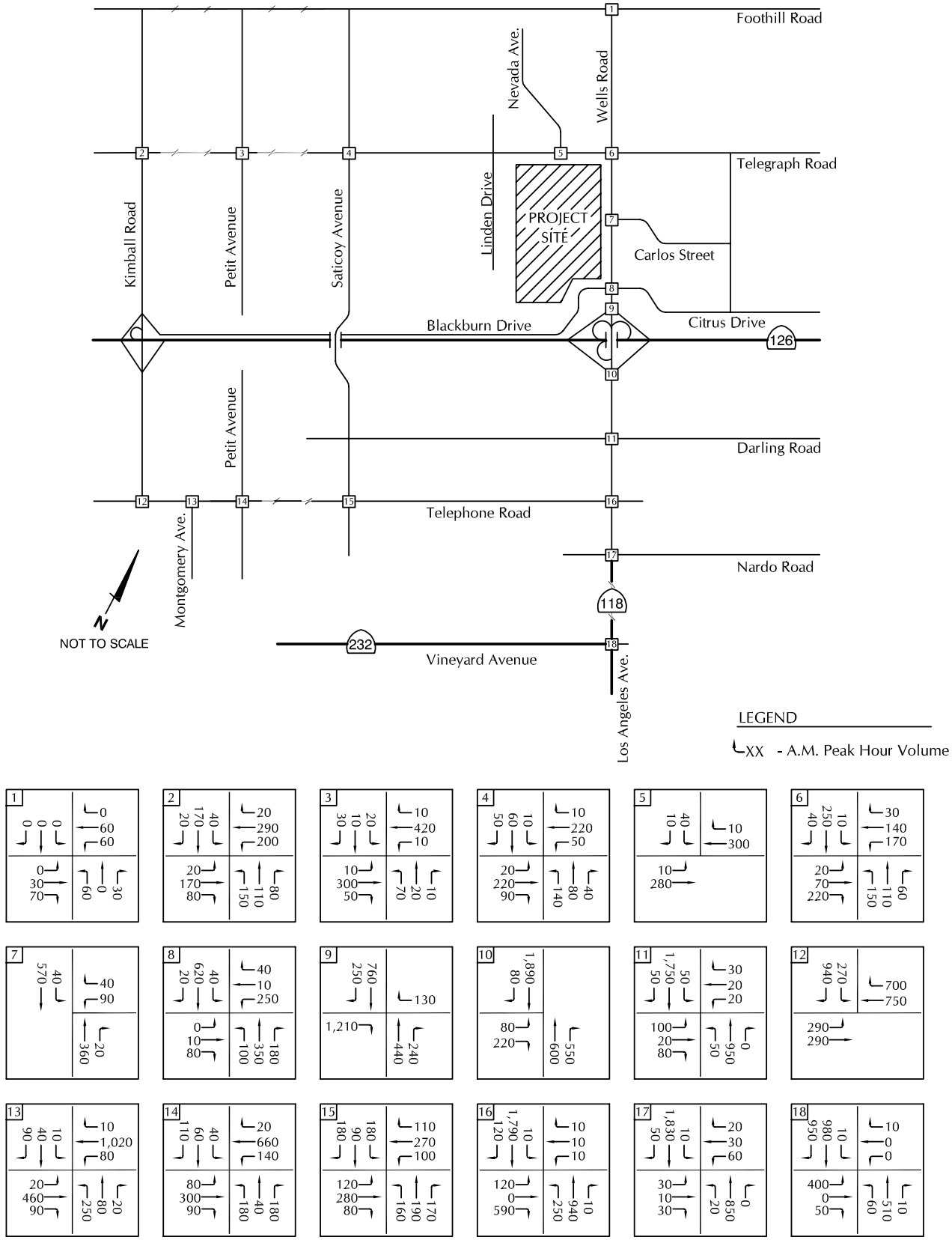
Level of Service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. Intersection Level of Service criteria are shown in Table 4.9-2. Level of service calculation worksheets and a brief discussion of the procedures used to calculate intersection levels of service are contained in the Technical Appendix (see Appendix H). The City of Ventura does not have an adopted level

of service standard for roadway segments. Intersections are the bottlenecks where congestion occurs first and the number of through lanes at intersections determines the size of a roadway segment. Table 4.9-3 lists the study area intersections and their corresponding A.M. and P.M. peak hour levels of service for existing traffic conditions. The intersection numbering correlates with the numbering system used in the Technical Appendix of the Traffic Report located in Appendix H.

Table 4.9-2
Intersection Level of Service Criteria

Level of Service	ICU	Description
Signalized Intersections		
A	<0.61	Very short delays. Most vehicles do not stop.
B	0.61 – 0.70	Generally good progression of vehicles. Some delays.
C	0.71 – 0.80	Fair progression. Increased number of stopped vehicles.
D	0.81 – 0.90	Noticeable congestion. Large portion of vehicles stopped.
E	0.91 – 1.00	Poor progression. Long delays and frequent cycle failure.
F	>1.00	Oversaturation. Forced flow. Extensive queuing.
Unsignalized Intersections		
Level of Service	**Average Delay per Vehicle**	**Description**
A	< 10 seconds	Little or no conflicting traffic for minor street approach.
B	10 – 15 seconds	Minor street approach begins to notice absence of available gaps.
C	15 – 25 seconds	Minor street approach begins experiencing delay for available gaps.
D	25 – 35 seconds	Minor street approach experiences queuing due to a reduction in available gaps.
E	35 – 50 seconds	Extensive minor street queuing due to insufficient gaps.
F	> 50 sec	Insufficient gaps of suitable size to allow minor street traffic demand to cross safely through a major traffic stream.

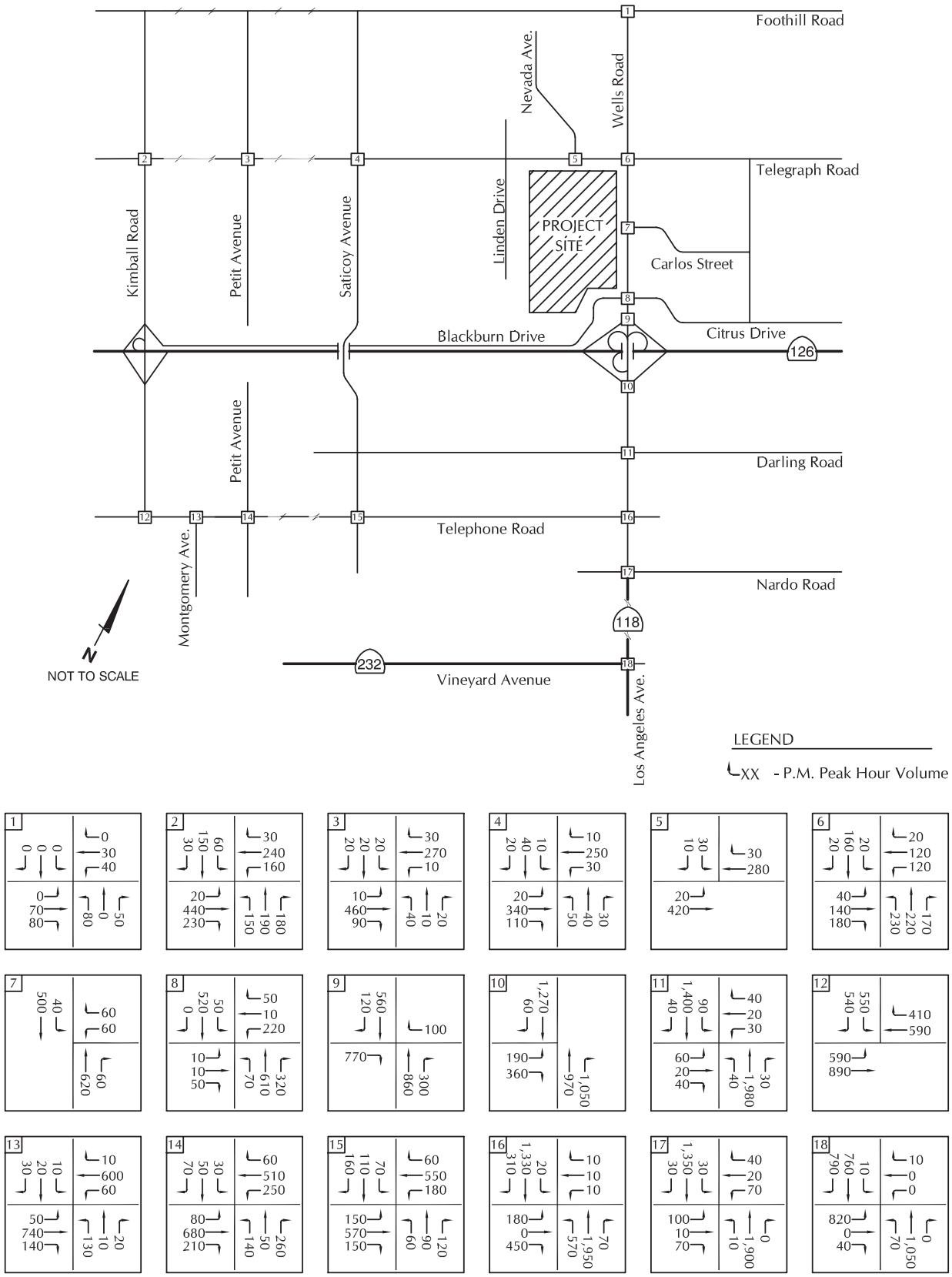
The data presented in Table 4.9-3 indicates that all of the intersections included in this traffic study operate at LOS C or better under existing conditions, which is considered acceptable based on the City's level of service standards.



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Existing A.M. Peak Hour Volumes

Figure 4.9-2



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Existing P.M. Peak Hour Volumes

Figure 4.9-3

Table 4.9-3
Existing A.M. and P.M. Peak Hour Intersection Level of Service

Intersection	Control	A.M. Peak Hour		P.M. Peak Hour	
		ICU/Delay	LOS	ICU/Delay	LOS
1. Foothill Road/Wells Road [1]	Stop-Sign	8.9 sec	A	9.2 sec	A
2. Telegraph Rd/Kimball Rd	Signal	0.21	A	0.30	A
3. Telegraph Rd/Petit Ave	Signal	0.34	A	0.24	A
4. Telegraph Rd/Saticoy Ave	Signal	0.38	A	0.37	A
5. Telegraph Rd/Nevada Ave[1]	Stop Sign	10.7 sec/veh	B	10.5 sec/veh	B
6. Telegraph Rd/Wells Rd	Signal	0.54	A	0.52	A
7. Carlos St/Wells Rd [1]	Stop Sign	12.5 sec/veh	B	12.2 veh/sec	B
8. Citrus Dr-Blackburn Rd/Wells Rd	Signal	0.33	A	0.34	A
9. SR-126 WB Ramps/Wells Rd [1]	Stop-Sign	10.5 sec/veh	B	12.5	B
10. SR-126 EB Ramps /Wells Rd	Signal	0.73	C	0.63	B
11. Darling Road/Wells Road	Signal	0.72	C	0.63	C
12. Telephone Road/Kimball Road	Signal	0.69	B	0.53	A
13. Telephone Rd/Montgomery Ave	Signal	0.57	A	0.38	A
14. Telephone Rd/Petit Ave	Signal	0.41	A	0.49	A
15. Telephone Rd/Saticoy Ave	Signal	0.39	A	0.41	A
16. Telephone Rd/Wells Rd	Signal	0.78	C	0.72	C
17. Nardo Street/Wells Road	Signal	0.64	B	0.71	C
18. Los Angeles Ave./Vineyard Ave.	Signal	0.56	A	0.61	B

[1] *Unsignalized intersection; level of service determined by average delay per vehicle*

c. Planned Roadway Improvements. Several long-term roadway and intersection improvement projects have been identified in the City's 2005 General Plan EIR that would be required to maintain the City's performance standards under Year 2025 conditions. Table 4.9-4 lists the committed improvements (those that are funded and planned for implementation) that would affect the study area roadway network.

The new roadway "A" Street, programmed to extend from Saticoy Avenue to Wells Road, would connect to the existing segment of Carlos Street located north of the Country Estates Mobile Home Park and west of the plan area. When fully constructed, this roadway will provide a direct connection between the Parklands Project and Saticoy Avenue. It is noted that the segment of Telegraph Road from Saticoy Avenue to Wells Road and the segment of Wells Road between Telegraph and Carlos Street were originally expected to be widened to four lanes as part of the 2005 General Plan. However, the need for additional capacity was reevaluated as part of the Wells Saticoy Community Plan process, and it was determined that the roadways

Table 4.9-4
City of Ventura Committed Roadway Network Improvements

Roadways/Intersections	Improvement
Telegraph Road (Saticoy Avenue to Wells Road)	Widen to four Lanes [1]
Wells Road (SR 126 to City limits)	Widen to six Lanes
Wells Road (Carlos Street to Citrus Drive)	Widen to four lanes
"A" Street (Saticoy Avenue to Wells Road)	New two-lane roadway
Wells Road/SR 126 Eastbound Ramps intersection	Add third northbound and southbound through lanes
Wells Road/Darling Road intersection	Add third northbound and southbound through lanes
Wells Road/Telephone Road intersection	Add third northbound and southbound through lanes
Wells Road/Nardo Street	Add third northbound and southbound through lanes

Source: ATE, Parklands Project, City of Ventura, Traffic and Circulation Study. September 2008.

[1] This improvement has been reevaluated, no widening ins proposed on Telegraph Road.

do not need to be widened. Therefore, a General Plan amendment has been proposed to modify the roadway designation of Wells Road from a four-lane arterial to collector standard in the near term, while retaining the option to widen to arterial standards in the long term. In addition, a similar General Plan amendment and designation change for Telegraph Road is proposed in conjunction with another project located nearby.

Based on City staff direction, the committed roadway and intersection improvements listed in Table 4.9-4, including the general plan amendments discussed above, were assumed in the Year 2025 analysis provided in this traffic study. Frontage improvements planned to occur in conjunction with the proposed project are described below.

- *Telegraph Road. Frontage improvements include widening of Telegraph Road along the project's frontage to provide two-travel lanes, parallel parking on both sides of the street, a bike lane on the south side of the street, a central median, and a 28-foot parkway on the north side of the street. The proposed parkway would provide a meandering bike lane and pedestrian path.*

- *Wells Road (north of Citrus Drive). Improvements include widening the street to provide one travel lane in each direction with parallel parking and bicycle lanes on both sides of the street. A center median would also be installed along this segment.*

- *Wells Road (South of Citrus Drive). Improvements including widening the roadway to provide two travel lanes in each direction, as well as parallel parking and bicycle lanes on both sides of the street. A center median would also be installed along this segment.*

- *Blackburn Road. Blackburn Road would be realigned to connect to the plan area's main roadway approximately 100 feet west of Wells Road. Additional improvements would include construction of curb, gutter and sidewalk on Blackburn Road along the plan area frontage.*

4.9.2 Impact Analysis and Mitigation Measures

a. Methodology and Significance Thresholds. Trip generation estimates were calculated for the Parklands Project using the City approved Single Family Residential, Condominium, and Community Shopping trip generation rates. Pursuant to the City's traffic analysis guidelines, a pass-by factor of 30% was applied to the trip generation estimates for the Community Shopping component.

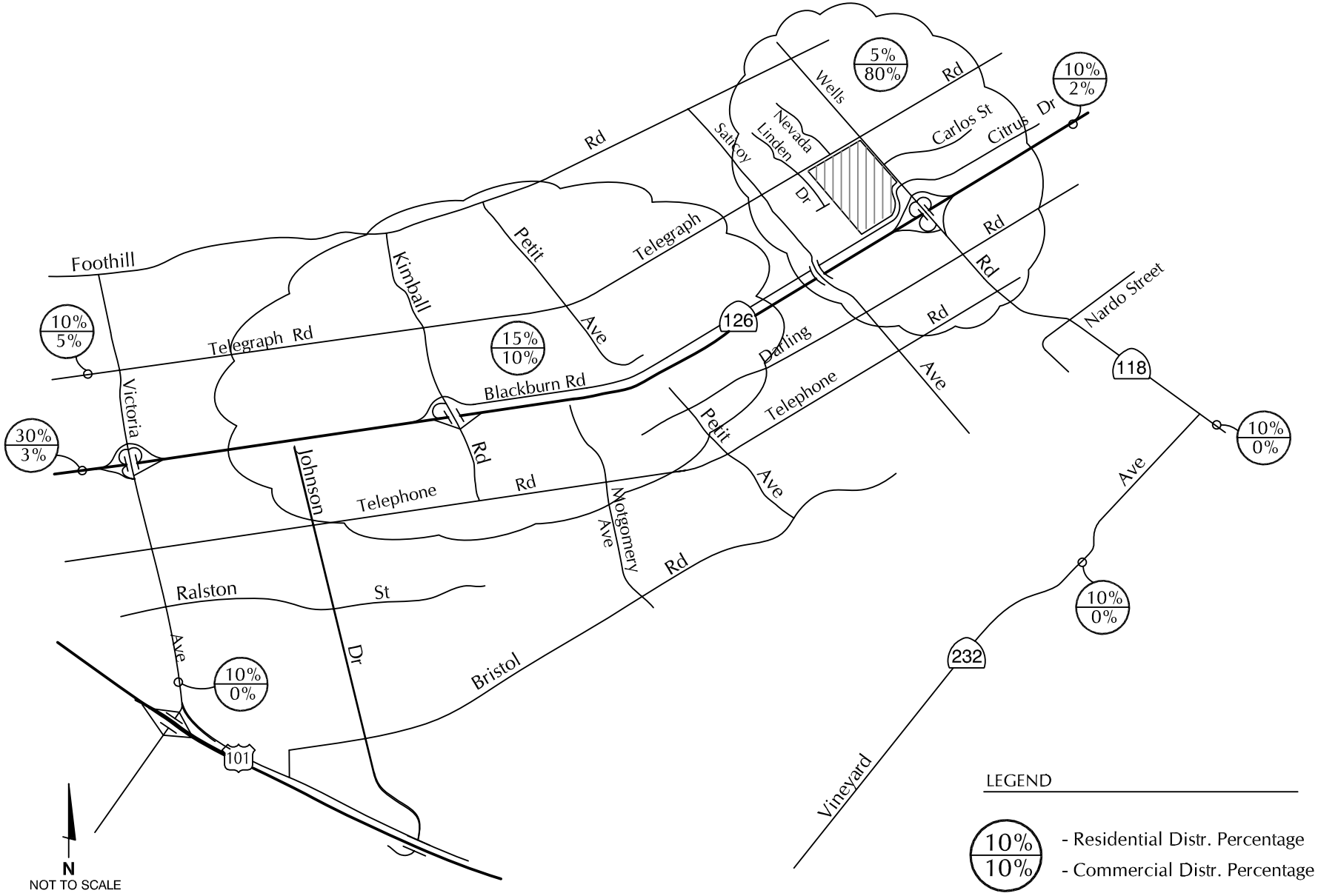
The distribution pattern for the residential component was developed based on information presented in existing traffic studies, existing traffic volumes measured in the study area, and the access locations shown on the site plan. The commercial component is expected to function as a "Neighborhood Center" which would generate traffic from within the Parklands plan area and the local area immediately adjacent to the plan area. The distribution pattern for the commercial uses was therefore developed based on the location of the residential areas within the vicinity of the plan area. Table 4.9-5 and Figure 4.9-4 show the trip distribution percentages for the specific plan.

Table 4.9-5
Project Trip Distribution Percentages

Origin/Destination	Direction	Residential Component Distribution %	Commercial Component Distribution %
State Route 126	West	30%	3%
State Route 126	East	10%	2%
State Route 118	South	10%	0%
Vineyard Avenue (to Oxnard/U.S. 101)	South	10%	0%
Victoria Avenue	Southwest	10%	0%
Telegraph Road	West	10%	5%
Local Area (West of Saticoy Avenue)	West	15%	10%
Local Area (East of Saticoy Avenue)	--	5%	80%
	Total	**100%**	**100%**

Project-generated traffic was assigned to the study area street system based on the distribution percentages shown in Table 4.9-5. Intersection operations were evaluated based on performance standards and thresholds of significance.

The year 2025 intersection peak hour traffic volume forecasts for the study area intersections were obtained from City staff. The year 2025 traffic volumes were developed using the Ventura



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Project Trip Distribution Percentages

Figure 4.9-4

citywide traffic model, which utilizes General Plan land use and circulation system assumptions to derive corresponding traffic forecast data. It thus includes the committed roadway and intersection improvements discussed previously in the Planned Roadway Network Improvements section. It is noted that the volumes for the Vineyard Avenue/Los Angeles Avenue intersection, which were obtained from the traffic study completed for the Ventura County Yard Project.

Performance standards include level of service E (peak hour ICU less than or equal to 1.00) for freeway ramp intersections and non-Principal Intersections that are located in the CMP network. Level of service D (peak hour ICU less than or equal to 0.90) is the performance standard for all other principal intersections. For an intersection that is forecast to operate worse than its performance standard, the impact of a project is considered to be significant if the project increases the ICU by more than 0.01.

b. Project and Cumulative Impacts and Mitigation Measures. If a significant impact occurs, the project developer is required to construct improvements or implement other methods to reduce the impact to a level that is less than significant. The thresholds of significance identified above assume full contribution to the Traffic Mitigation Fee Fund.

As indicated in the previously, traffic volumes expected to be generated by the project were estimated from ITE trip generation rates. Table 4.9-6 shows the trip generation estimates developed for the project. Specific plan buildout would generate an estimated 6,344 average daily trips (ADT), with 352 trips during the A.M. peak hour and 602 trips during the P.M. peak hour. Of these trips, 5,558 ADT, 332 A.M. peak hour trips and 531 P.M. peak hour trips would be new to the adjacent roadway system.

Table 4.9-6
Trip Generation

Land Use	Size	Average Daily		A.M. Peak Hour		P.M. Peak Hour	
		Rate	Trip Ends	Rate	Trip Ends	Rate	Trip Ends
Single Family Residential	216 DU	9.57	2,067	0.75	162	1.01	218
Condominiums	283 DU	5.86	1,658	0.44	125	0.54	147
Commercial	25.0 KSF	104.77	2,619	2.60	65	9.46	237
(Primary Trips - 70%)			(1,833)		(465)		(166)
(Pass-by Trips - 30%)			(786)		(20)		(71)
TOTAL			**6,344**		**352**		**602**
TOTAL With Pass-by Trips			**5,558**		**332**		**531**

KSF = 1,000 square feet; DU = dwelling units

For the A.M. peak hour, Figure 4.9-5 shows the project traffic volumes assigned to the study area intersections and Figure 4.9-6 shows project traffic assignment to the project access roadways. For the P.M. peak hour, Figure 4.9-7 shows the project traffic volumes assigned to the study area intersections and Figure 4.9-8 shows project traffic assignment to the plan area

access roadways. Development facilitated by the proposed specific plan would generate a total of 6,344 trips per day, of which 352 of them would occur in during the A.M. peak hour, and 602 trips would occur during the P.M. peak hour. Of these trips, 5,558 ADT, 332 A.M. peak hour trips and 531 P.M. peak hour trips would be new to the adjacent roadway system.

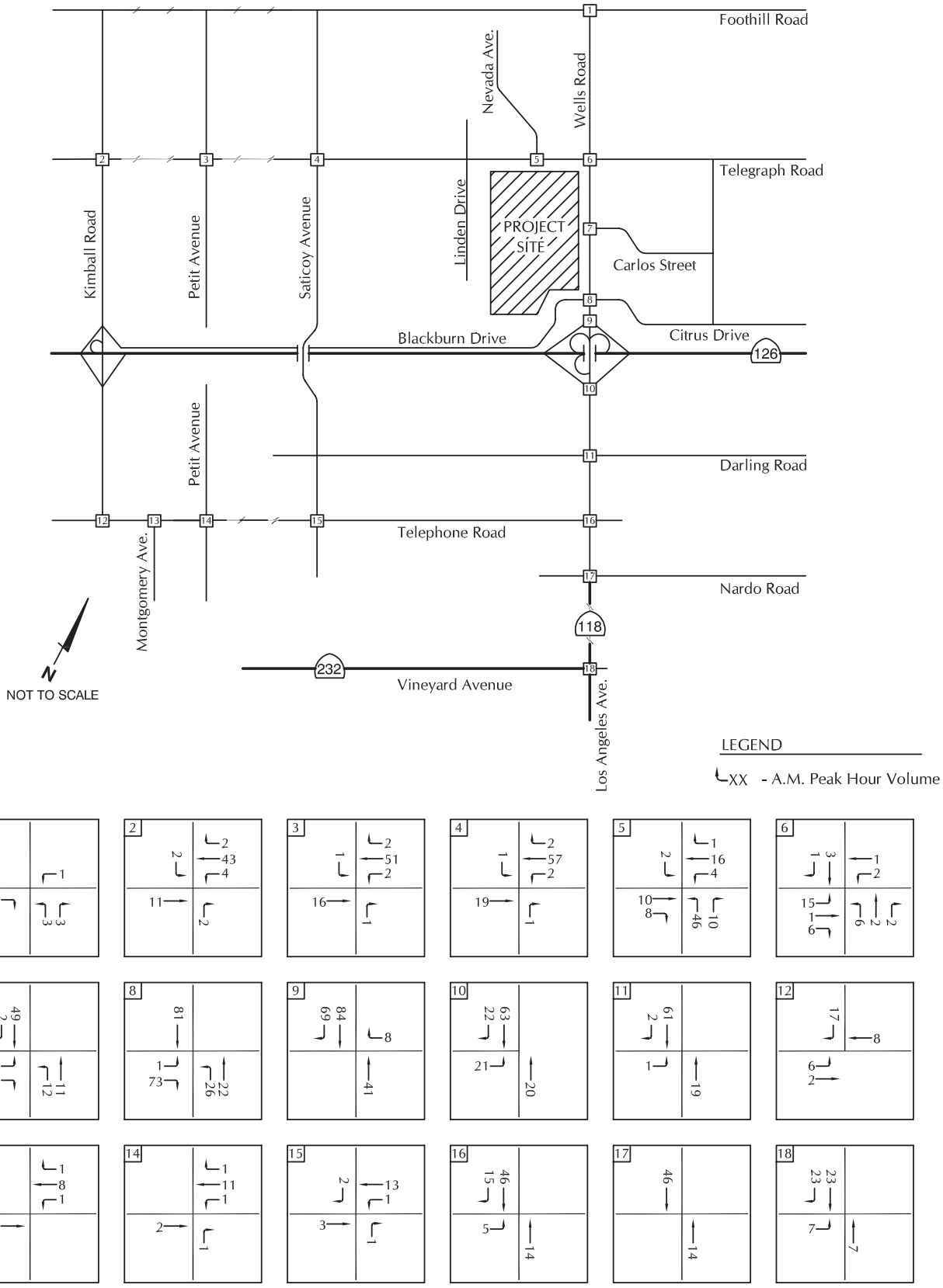
Impact T-1 Development facilitated by the proposed specific plan would increase traffic levels on the local circulation system. However, all studied intersections would operate at LOS C or better. Therefore, impacts are Class III, *less than significant*.

Project-generated traffic was assigned to the study area network intersections as indicated on Figures 4.9-5 through 4.9-8. Project added traffic volumes for study area intersections during the A.M. peak hour are shown on Figure 4.9-5. Project added traffic volumes for study area intersections during the P.M. peak hour are shown on Figure 4.9-7. Existing + Project Traffic Volumes are shown in Figures 4.9-9 and 4.9-10. Table 4.9-7 illustrates the post-project levels of service at the 15 study area intersections.

Table 4.9-7
Existing + Project A.M. and P.M. Intersection Levels of Service

Intersection	Existing + Project A.M. Peak Hr		Existing + Project P.M. Peak Hr	
	ICU/Delay – LOS	Significant Impact?	ICU/Delay - LOS	Significant Impact?
1. Foothill Road/Wells Road [1]	8.7 sec	No	9.3 sec - LOS A	No
2. Telegraph Road/Kimball Road	0.22 – LOS A	No	0.31 – LOS A	No
3. Telegraph Road/Petit Avenue	0.37 – LOS A	No	0.26 – LOS A	No
4. Telegraph Road/Saticoy Avenue	0.40 – LOS A	No	0.41 – LOS A	No
5. Telegraph Road/Nevada Avenue [1]	11.1 sec - LOS B	No	11.4 sec - LOS B	No
6. Telegraph Road/Wells Road	0.56 – LOS A	No	0.54 – LOS A	No
7. Carlos Street/Wells Road [1]	11.5 s/veh - LOS B	No	12.5 s/veh - LOS B	No
8. Citrus Drive-Blackburn Rd/Wells Rd	0.42 – LOS A	No	0.40 - LOS A	No
9. SR 126 Westbound Ramps/Wells Rd [1]	10.7 sec – LOS B	No	14.2 sec - LOS B	No
10. SR 126 Eastbound Ramps/Wells Rd	0.75 – LOS C	No	0.64 - LOS C	No
11. Darling Road/Wells Road	0.74 – LOS C	No	0.80 - LOS C	No
12. Telephone Road/Kimball Road	0.70 – LOS B	No	0.55 – LOS A	No
13. Telephone Road/Montgomery Avenue	0.57 – LOS A	No	0.39 – LOS A	No
14. Telephone Road/Petit Avenue	0.41 – LOS A	No	0.49 - LOS A	No
15. Telephone Road/Saticoy Avenue	0.40 – LOS A	No	0.41 - LOS A	No
16. Telephone Road/Wells Road	0.79 – LOS C	No	0.74 - LOS C	No
17. Nardo Street/Wells Road	0.66 – LOS B	No	0.72 – LOS C	No
18. Los Angeles Ave/Vineyard Ave	0.57 – LOS A	No	0.63 – LOS B	No

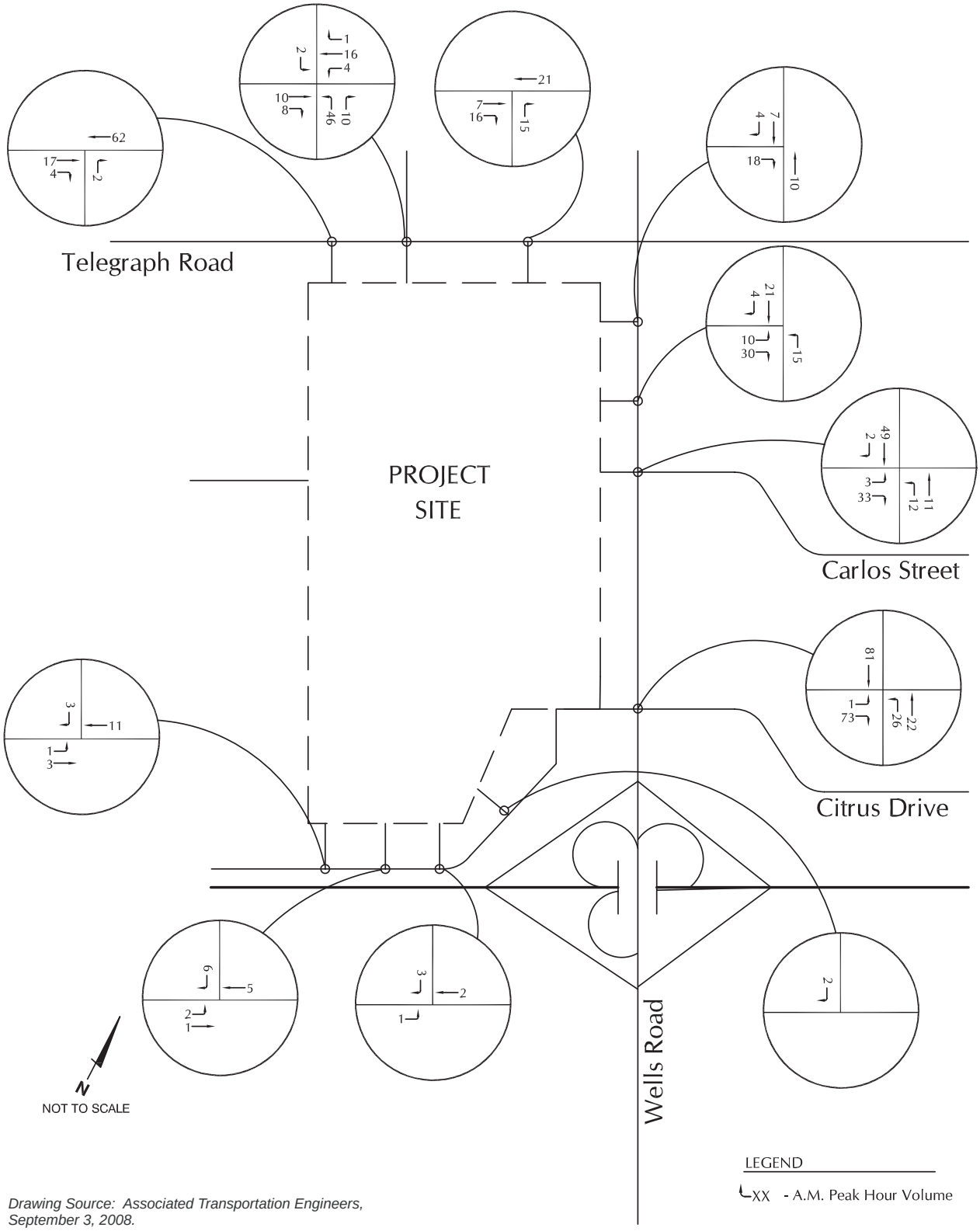
[1] *Unsignalized intersection: level of service determined by average delay per vehicle.*
Source: ATE, Parklands Project, City of Ventura, Traffic and Circulation Study. September 2008.



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Project-Added A.M. Peak Hour Volumes

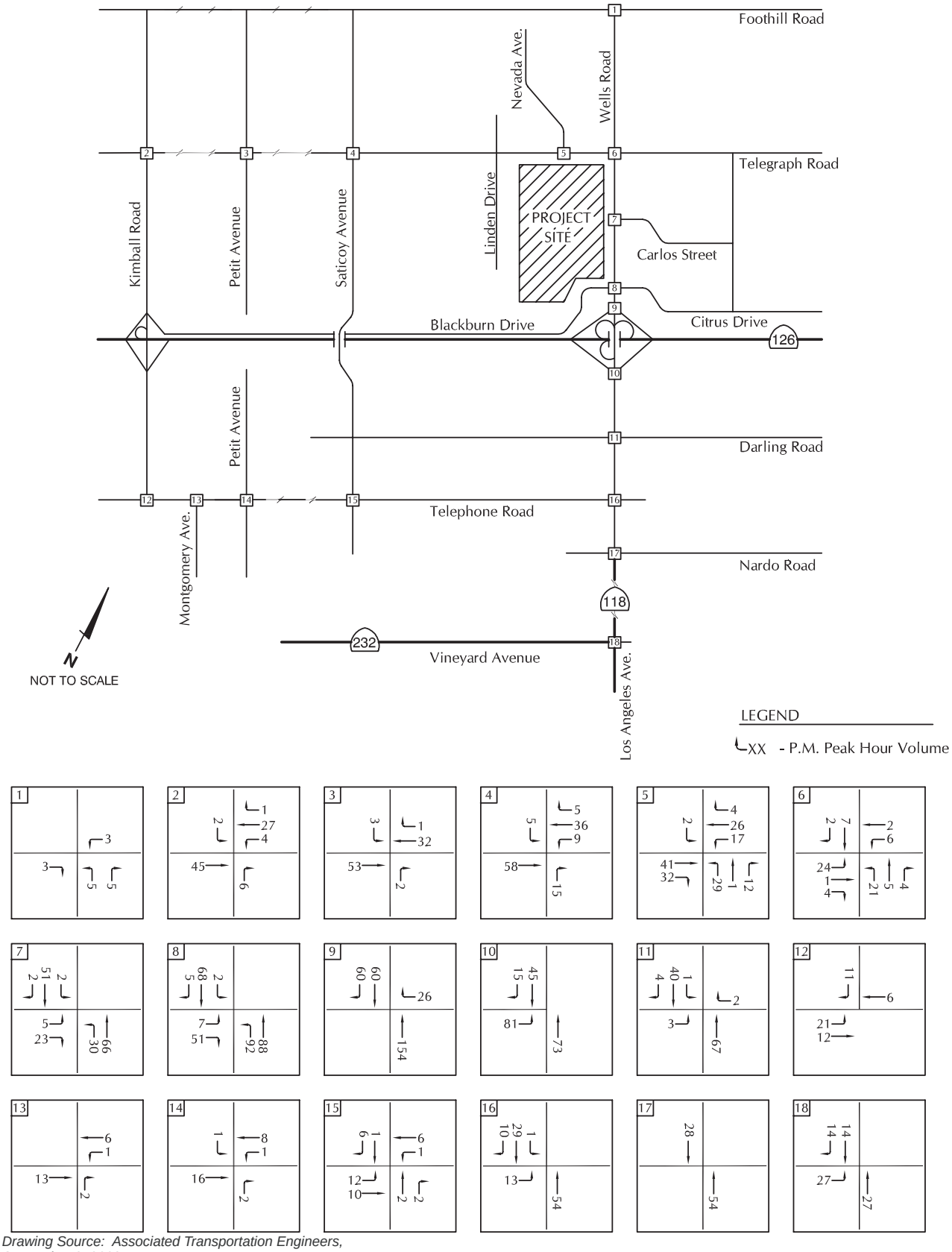
Figure 4.9-5



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Project-Added A.M. Peak Hour Volumes

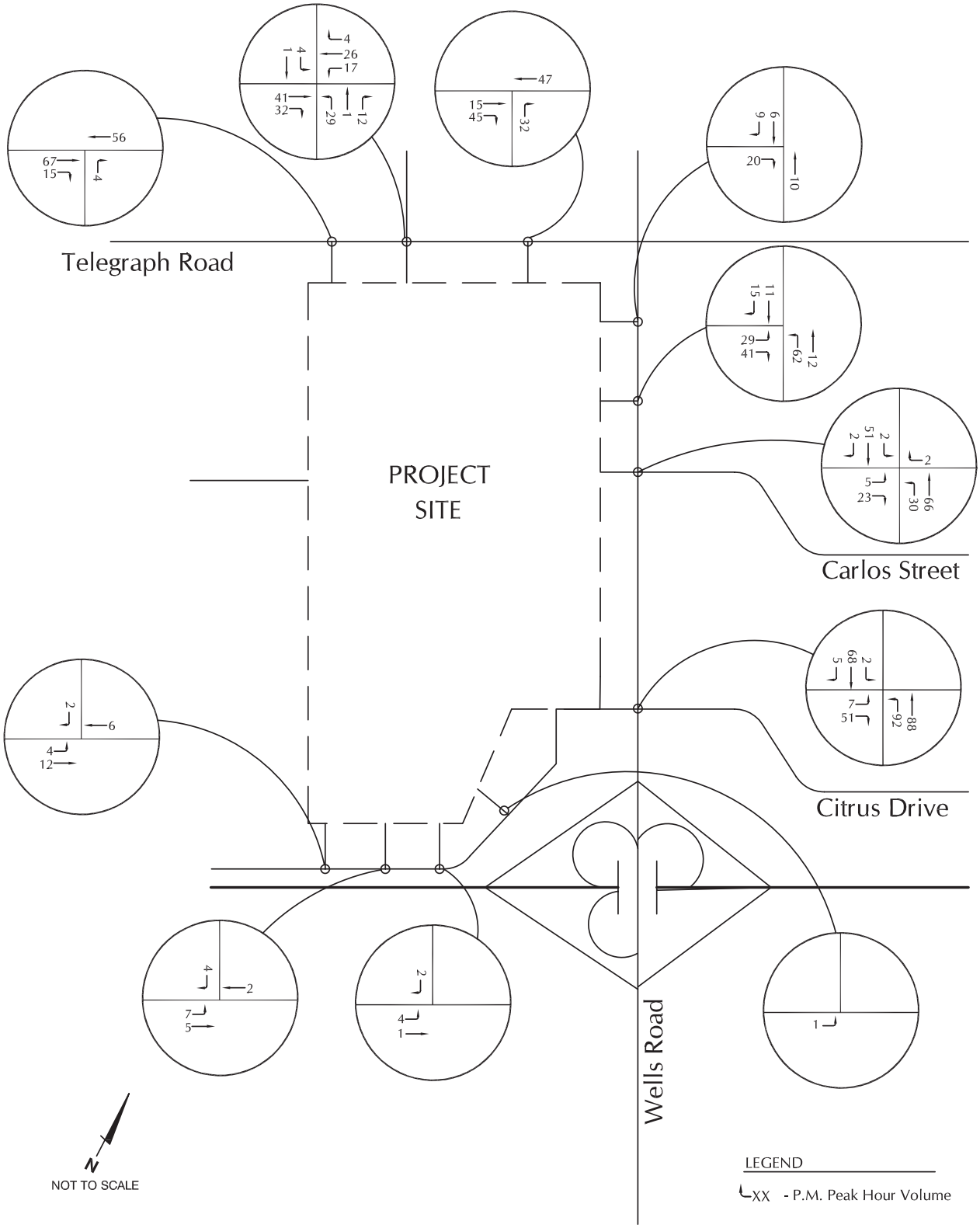
Figure 4.9-6



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Project-Added P.M. Peak Hour Volumes

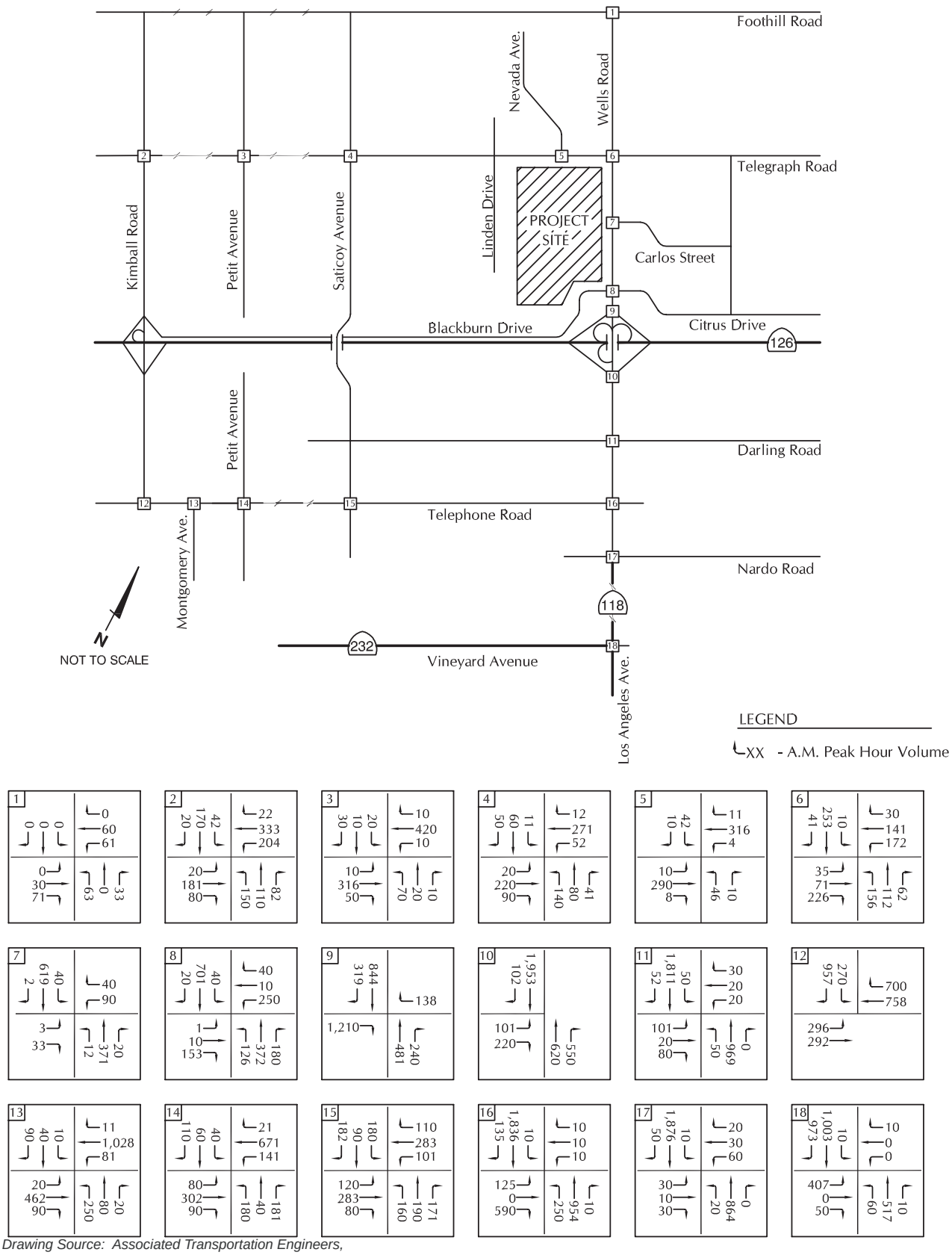
Figure 4.9-7



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Project-Added P.M. Peak Hour Volumes

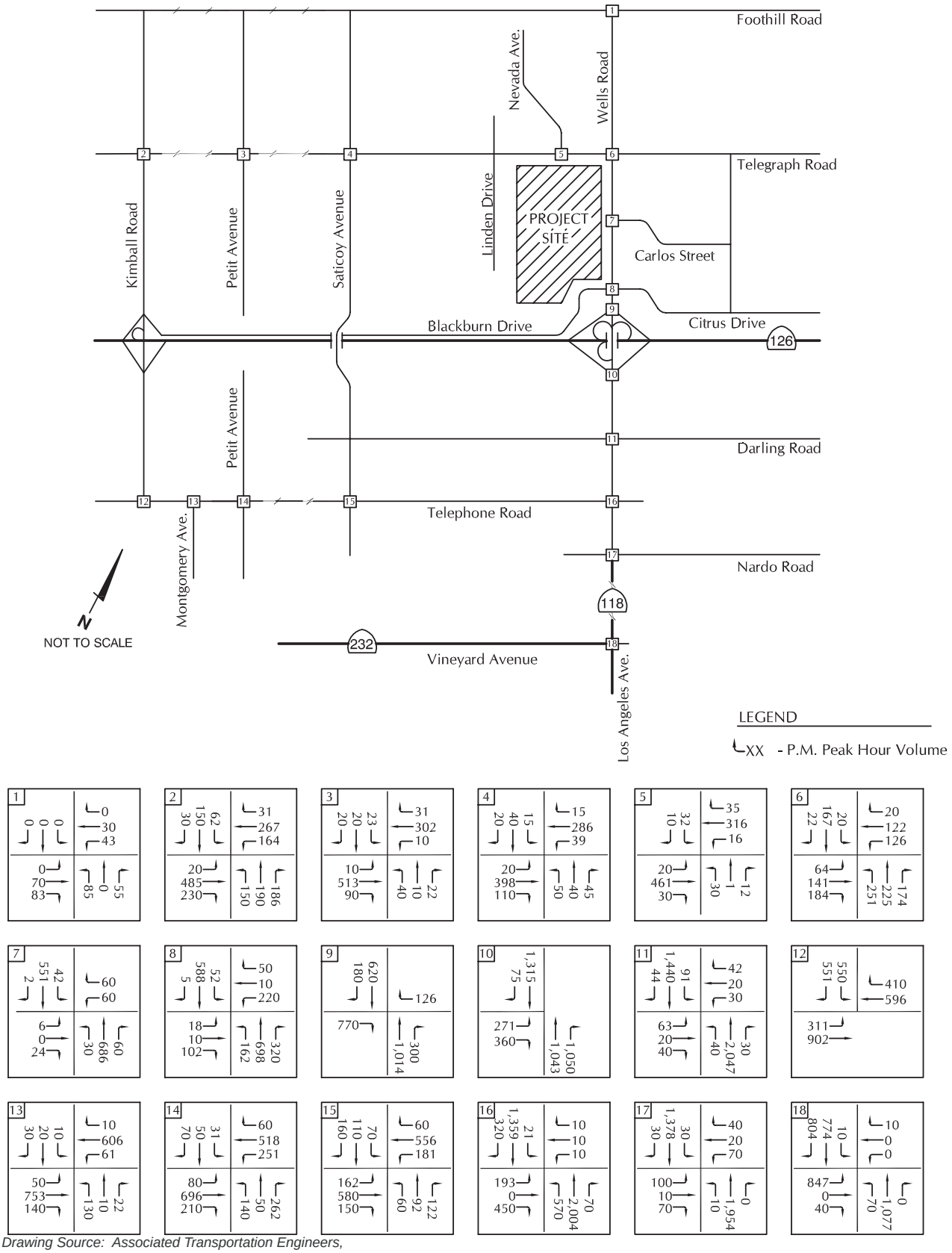
Figure 4.9-8



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Existing + Project A.M. Peak Hour Volumes

Figure 4.9-9



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Existing + Project P.M. Peak Hour Volumes

Figure 4.9-10

The level of service information presented in Table 4.9-7 indicates that all of the study intersections are forecast to operate at LOS C or better during the A.M. and P.M. peak hours with project-generated traffic and planned improvements as described in Section 9.9.1(c), starting on page 4.9-7.

Mitigation Measures. Traffic impacts associated with specific plan buildout would be less than significant and no mitigation measures are required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact T-2 Under project plus future year (2025) conditions, impacts would not cause levels of service to decline below acceptable levels at any of the study area intersections. Impacts would be Class III, *less than significant*.

Figures 4.9-11 and 4.9-12 show the year 2025 A.M. and P.M. peak hour traffic volumes, respectively. The project-added traffic volumes were layered onto the year 2025 intersection volumes to develop the year 2025+Project intersection traffic forecasts. Figures 4.9-13 and 4.9-14 show the year 2025 + project A.M. and P.M. peak hour traffic volumes. Tables 4.9-8 and 4.9-9 compare the year 2025 and year 2025 +project levels of service during the A.M. and P.M. peak hours.

The level of service data contained in Table 4.9-8 shows that all of the study area intersections would continue to operate at LOS C or better during the A.M. peak hour volumes. Significant cumulative impacts would not occur at any study area intersections during the A.M. peak hour under year 2025+project conditions.

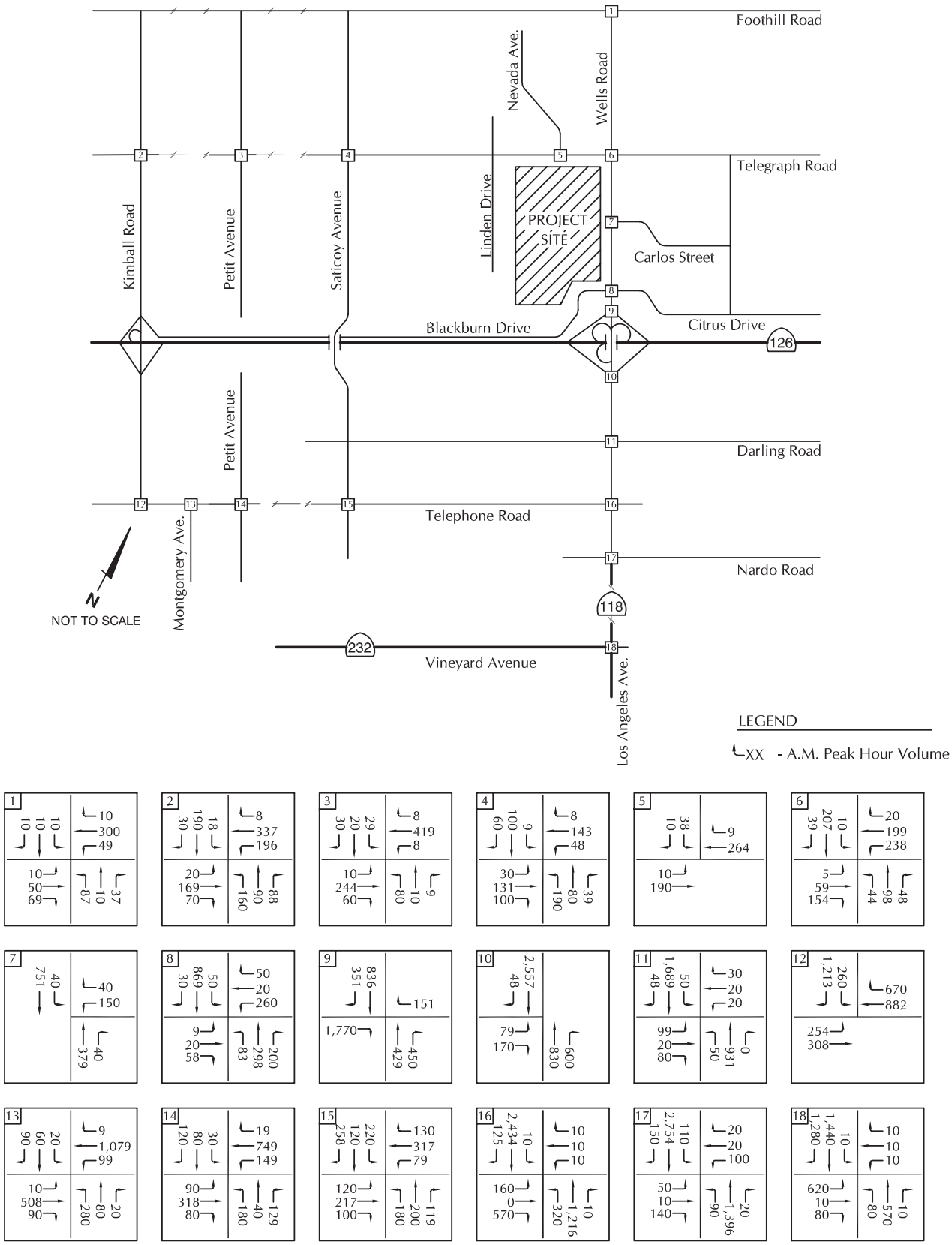
Table 4.9-9 indicates that the study area intersections are forecast to operate at LOS D or better during the P.M. peak hour under the year 2025 +project traffic volumes. Significant cumulative impacts would not occur during the P.M. peak hour under year 2025 + project conditions.

Mitigation Measures. None required.

Significance After Mitigation. Cumulative traffic impacts would be less than significant without mitigation.

Impact T-3 The proposed specific plan will create new intersections and result in development of new roadways. No specific thresholds would be exceeded; however, recommendations to improve access are included. This is a Class III, *less than significant* impact.

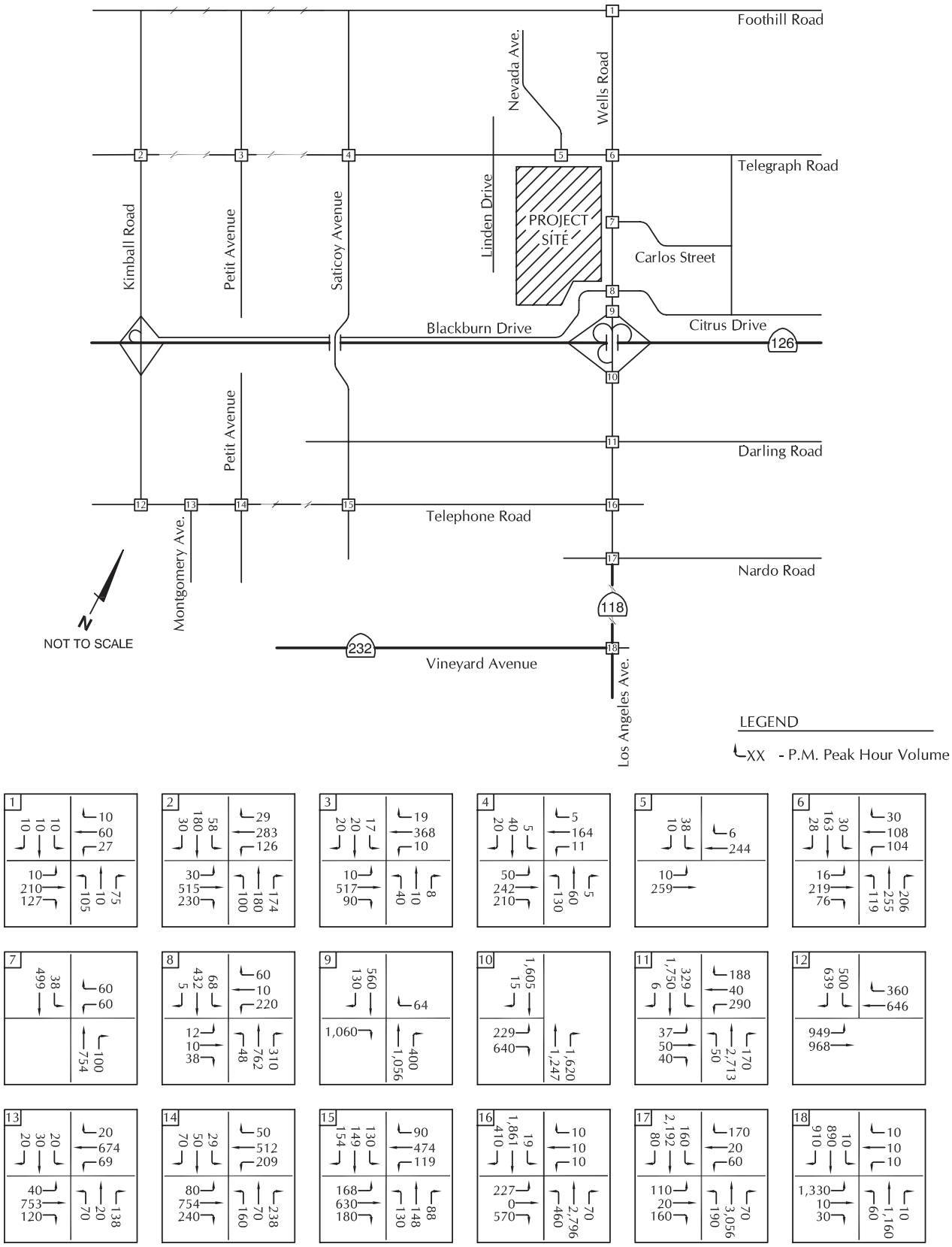
Plan Area Access. The lot distribution and circulation plan (see figures 2-4 and 2-5 in Section 2.0, *Project Description*) indicates that access to the plan area would be provided by three connections located on Telegraph Road, four connections located on Wells Road, four connections on Blackburn Road and one connection to Carlos Street to the west. All connections would be unsignalized, except for the primary roadway connection on Wells Road



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Year 2025 A.M. Peak Hour Volumes

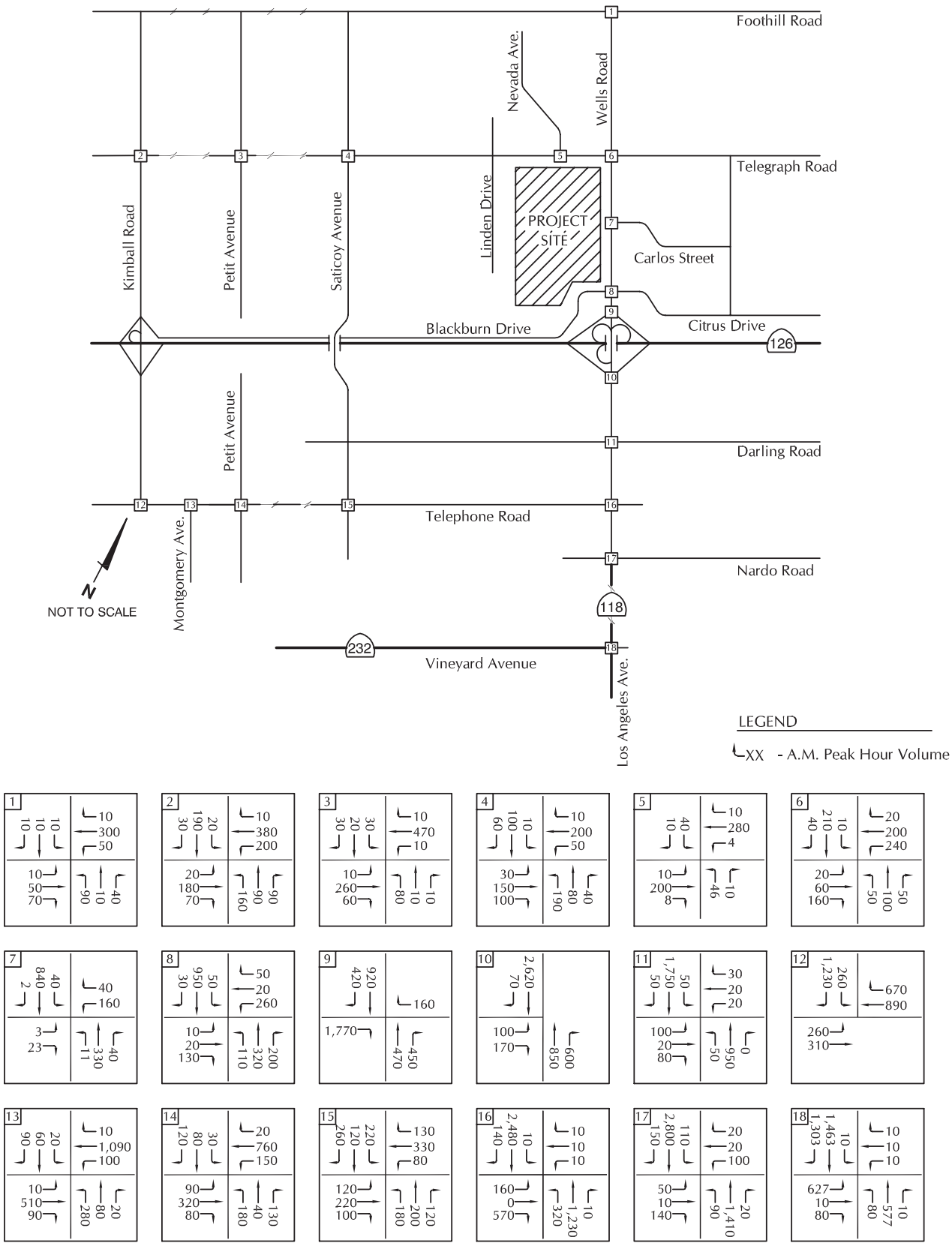
Figure 4.9-11



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Year 2025 P.M. Peak Hour Volumes

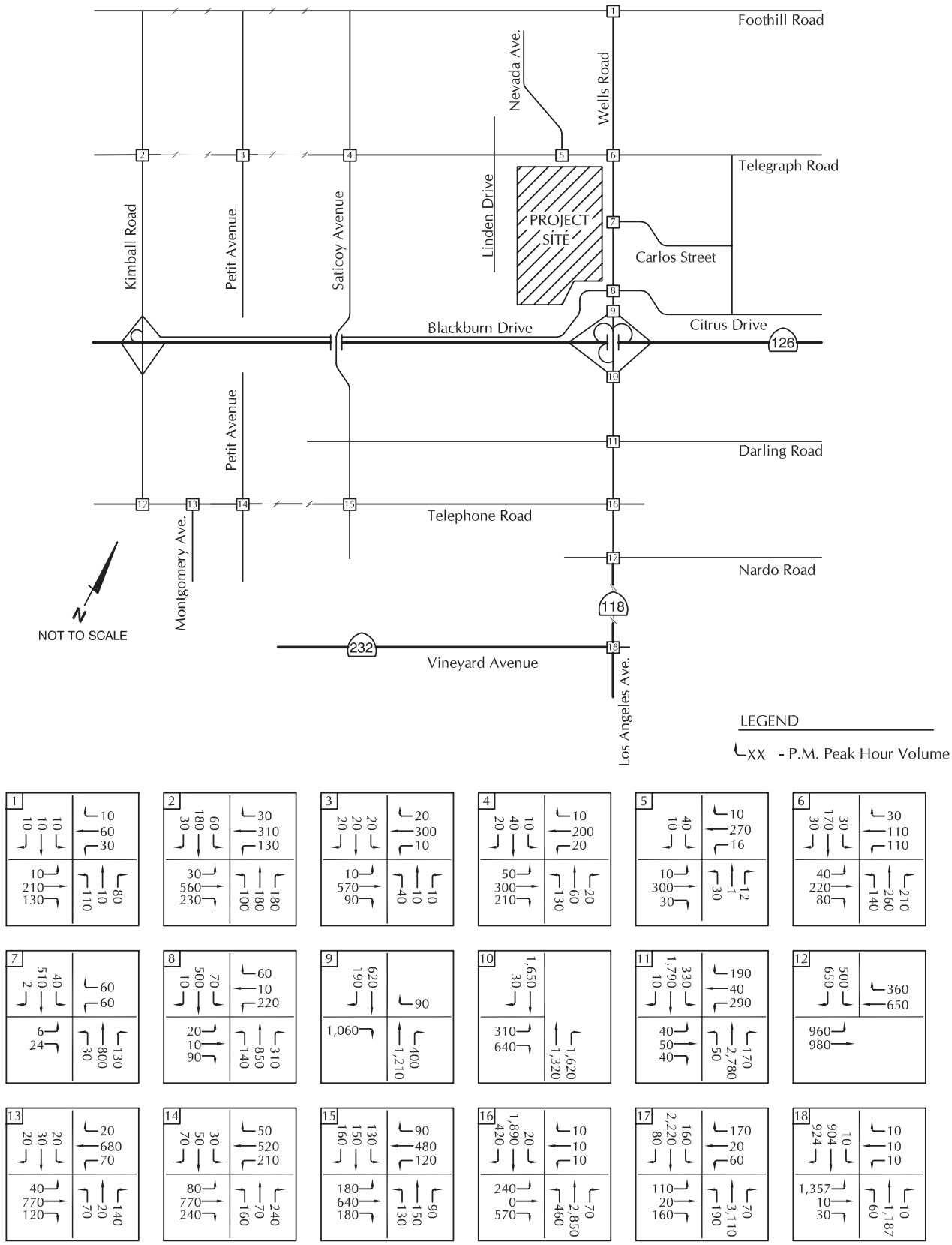
Figure 4.9-12



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Year 2025 + Project A.M. Peak Hour Volumes

Figure 4.9-13



Drawing Source: Associated Transportation Engineers, September 3, 2008.

Year 2025 + Project P.M. Peak Hour Volumes

Figure 4.9-14

Table 4.9-8
2025 Study Area Intersection A.M. Peak Hour
LOS and Project Impacts

Intersection	Year 2025 A.M. Peak Hr	Year 2025 + Project A.M. Peak Hr	
	ICU/Delay – LOS	ICU/Delay - LOS	Impact
1. Foothill Road/Wells Road [1]	9.7 sec. – LOS A	11.6 sec. – LOS B	No
2. Telegraph Road/Kimball Road	0.23 – LOS A	0.24 – LOS A	No
3. Telegraph Road/Petit Avenue	0.35 – LOS A	0.38 - -LOS A	No
4. Telegraph Road/Saticoy Avenue [2]	0.47 - LOS A	0.49 – LOS A	No
5. Telegraph Road/Nevada Avenue [1 2]	10.2 sec. - LOS B	10.5 sec. – LOS B	No
6. Telegraph Road/Wells Road	0.44 - LOS A	0.45 – LOS A	No
7. Carlos Street/Wells Road [1 2]	12.1 sec. - LOS B	14.8 sec – LOS B	No
8. Citrus Dr.-Blackburn Rd/Wells Road	0.38 - LOS A	0.45 – LOS A	No
9. State Route 126 WB Ramps/Wells Road [1]	10.6 sec. - LOS B	10.9 sec. - LOS B	No
10. State Route 126 EB Ramps/Wells Road [2]	0.64 - LOS B	0.66 - LOS B	No
11. Darling Road/Wells Road [2]	0.61 - LOS B	0.62 - LOS B	No
12. Telephone Road/Kimball Road	0.76 - LOS C	0.76 - LOS C	No
13. Telephone Road/Montgomery Avenue [2]	0.58 - LOS A	0.58 - LOS A	No
14. Telephone Road/Petit Avenue [2]	0.45 – LOS A	0.46 - LOS A	No
15. Telephone Road/Saticoy Avenue [2]	0.48 – LOS A	LOS A – 0.49	No
16. Telephone Road/Wells Road [2]	0.71 – LOS A	0.72 - LOS C	No
17. Nardo Street/Wells Road [2]	0.71 – LOS C	0.72 – LOS C	No
18. Los Angeles Avenue/Vineyard Avenue	0.77 – LOS C	0.78 - LOS C	No

[1] *Unsignalized intersection: level of service determined by average delay per vehicle.*
[2] *Assumes City committed intersection improvements.*
Source: ATE, Parklands Project, City of Ventura, Traffic and Circulation Study. September 2008.

Table 4.9-9
2025 Study Area Intersection P.M. Peak Hour
LOS and Project Impacts

Intersection	Year 2025 A.M. Peak Hr	Year 2025 + Project A.M. Peak Hr	
	ICU/Delay – LOS	ICU/Delay - LOS	Impact
1. Foothill Road/Wells Road [1]	11.1 sec. – LOS B	11.2 sec. – LOS B	No
2. Telegraph Road/Kimball Road	0.32 – LOS A	0.34 – LOS A	No
3. Telegraph Road/Petit Avenue	0.24 – LOS A	0.26 - -LOS A	No
4. Telegraph Road/Saticoy Avenue [2]	0.45 - LOS A	0.50 – LOS A	No
5. Telegraph Road/Nevada Avenue [1 2]	9.5 sec. - LOS A	10.2 sec. – LOS B	No
6. Telegraph Road/Wells Road	0.42 - LOS A	0.46 – LOS A	No
7. Carlos Street/Wells Road [1 2]	10.5sec. - LOS B	13.5sec – LOS B	No
8. Citrus Dr.-Blackburn Rd/Wells Road	0.39 - LOS A	0.46 – LOS A	No
9. State Route 126 WB Ramps/Wells Road [1]	13.3 sec. - LOS B	15.1 sec. - LOS C	No
10. State Route 126 EB Ramps/Wells Road [2]	0.73 - LOS C	0.74 - LOS C	No
11. Darling Road/Wells Road [2]	0.84 - LOS D	0.85 - LOS D	No
12. Telephone Road/Kimball Road	0.65 - LOS B	0.66 - LOS B	No
13. Telephone Road/Montgomery Avenue [2]	0.35 - LOS A	0.35 - LOS A	No
14. Telephone Road/Petit Avenue [2]	0.58 – LOS A	0.58 - LOS A	No
15. Telephone Road/Saticoy Avenue [2]	0.46 – LOS A	0.47 - LOS A	No
16. Telephone Road/Wells Road [2]	0.70 – LOS B	0.72 - LOS C	No
17. Nardo Street/Wells Road [2]	0.83 – LOS D	0.85 – LOS D	No
18. Los Angeles Avenue/Vineyard Avenue	0.80 – LOS C	0.82 - LOS D	No

[1] *Unsignalized intersection: level of service determined by average delay per vehicle.*
[2] *Assumes City committed intersection improvements.*
Source: ATE, Parklands Project, City of Ventura, Traffic and Circulation Study. September 2008.

opposite Citrus Drive, which is signalized. The following text provides an analysis of the operations of the street connections to the existing street network based on the project turning volumes shown on figures4.9-6 and 4.9-8, and the future traffic volumes on the adjacent street system.

Telegraph Road. The most western street connection to Telegraph Road and the driveway located west of Wells Road would be restricted to right-turn movements only. These connections would operate acceptably with minimal delays. The main connection is proposed opposite Nevada Avenue. This connection would be full access and controlled by a stop sign. The intersection would operate at LOS B with stop signs and single lanes on the side street approaches, which is considered acceptable. The site plan indicates that the westbound left-turn bay on Telegraph Road would contain 150 feet of storage. This would be sufficient to provide storage for the expected westbound left-turn movement (16 PHT or less) into the project roadway.

The main plan area connection on Telegraph Road opposite Nevada Avenue would be designed as a two-lane divided "Parkway." It would contain 17-foot wide inbound and outbound lanes that are divided by a raised median, which would extend to the intersection with Telegraph Road. A truck turning movement analysis using Autoturn software indicated that this configuration would accommodate a California Design Vehicle (wheelbase 40 feet), provided that on-street parking is prohibited on the parkway adjacent the intersection.

Wells Road. The specific plan includes four connections to Wells Road: two driveways that would provide access to the retail/condominium component of the plan area and two street connections opposite Carlos Street and Citrus Drive that would provide access to the residential areas west of the Brown Barranca.

The first driveway on Wells Road would be located approximately 250 feet south of Telegraph Road. The driveway would be restricted to right-turns only, and would operate acceptably. The second driveway would be located approximately 500 feet south of Telegraph Road. This driveway would be full access. The section of Wells Road adjacent to the full access driveway would contain one through lane and a left-turn bay in the northbound direction, and one through lane and a shared through/right-turn lane in the southbound direction. The plan area driveway would be 24 feet wide, providing for one inbound and one outbound lane. The intersection would operate at LOS B with a stop sign on the side street approach, which is considered acceptable.

The length of the driveway throat of the second driveway from Telegraph Road is shown as 30 feet. Directly west of the driveway throat, the driveway contains a median and angled parking on both sides. The current design would not accommodate simultaneous driveway and parking movements. The proposed design would not create any significant safety hazards. Nevertheless, it is recommended that the driveway and driveway throat length be modified to accommodate turning and parking movements.

The third connection to Wells Road would be located opposite Carlos Street. This roadway connection would be full access. The connection would contain one inbound and one outbound lane (a total of 30 feet wide) and would be controlled by a stop sign. The new Wells Road/Carlos Street is forecast to operate at LOS B under the Year 2025 +Project scenario, which

is considered acceptable based on City thresholds. The proposed design would not create any significant safety hazards. Nevertheless, it is recommended that frontage improvements at this location include modification of the existing raised median on Wells Road to accommodate a northbound left-turn bay, which should contain 100 feet of vehicle storage and a 60 foot taper to accommodate the forecast turning volume of 30 P.M. peak hour trips (PHT).

The fourth project connection to Wells Road would be located opposite Citrus Drive at the current connection of Blackburn Road to Wells Road. This connection would be designed as a two-lane divided "Parkway." It would contain 20-foot wide inbound and outbound lanes that are divided by a raised median, which is set back approximately 25 feet from the intersection with Wells Road. A truck turning movement analysis using Autoturn software indicated that the proposed configuration would accommodate a California Design Vehicle provided that on-street parking is prohibited on the parkway between Wells Road and Blackburn Road.

The proposed design would not create any significant safety hazards. Nevertheless, it is recommended that the eastbound approach (project parkway) retain its current lane geometry (a shared left-turn/through and a right-turn lane), which would provide better operations and reduce queue lengths compared to the proposed one-lane approach. This would require that the median on the parkway be modified to provide sufficient width for two lanes on the eastbound approach, or that the approach be widened.

Wells Road contains raised medians with left-turn bays at the Wells Road/Citrus Drive intersection. The southbound left-turn bay contains 100 feet of vehicle storage, which is sufficient to accommodate the left-turn volume of 70 PHT or less. The northbound left-turn bay also contains 100 feet of storage, which is not adequate to accommodate the forecast left-turn volume of 126 PHT during the A.M. peak hour and 162PHT during the P.M. peak hour.

The proposed design would not create any significant safety hazards. Nevertheless, it is recommended that the median on Wells Road south of the Wells Road/Citrus Drive intersection be reconstructed to provide a minimum of 160 feet of storage in the northbound left-turn bay to avoid vehicles blocking through traffic on Wells Road. The total length of the left-turn bay would be 220 feet assuming a 60 feet taper. The distance from State Route 126 Westbound Off-Ramp to the Wells Road/Citrus Drive intersection is 300 feet, or 80 feet to the start of the taper of the modified left-turn lane on Wells Road. This length would be sufficient for vehicles that turn onto Wells Road from the Westbound Off-Ramp to access the northbound left-turn bay. Coordination with Caltrans would be required to finalize the ultimate design of the improvements on Wells Road.

Circulation. Vehicular, pedestrian and bicycle circulation are discussed below as components of the specific plan.

Vehicular Circulation. The plan area circulation system consists of two-lane divided parkways, two-lane undivided avenues, residential streets and alleys. Parking would be allowed on each of the internal roads, except the alleys. The street network contains elements that are designed to provide for low vehicular speeds throughout the plan area. These elements include 10-foot lane widths or less, on-street parking, tight curb radii and shared use of road by vehicles and bicyclists. In general, the two-lane divided parkway should be designed to

accommodate a California Design Vehicle (WB 40 semi-truck). The secondary roadways should be designed to accommodate trash trucks and emergency vehicles.

Pedestrian and Bicycle Circulation. Pedestrian access to the plan area would be provided via sidewalks on each of the roadway and driveway connections to the sidewalks on Telegraph Road, Wells Road and Blackburn Road, which would be constructed as frontage improvements. Sidewalks are provided along all the internal roadways, except the alleys. Crosswalks would be provided at the Telegraph Road/Wells Road and Wells Road/Citrus Drive intersections.

The bicycle circulation plan would consist of Class III bike lanes where bikes would share the road with vehicles. Class II bike lanes would be provided on Telegraph Road. Wells Road is currently designated as a Primary Arterial. Frontage improvements along Wells Road would thus include a Class II bike lane. It is noted that no bike lanes are provided on Wells Road south of the intersection with Citrus Drive.

External Improvements. External improvements refer to those that are outside the plan area and serve not only the project, but the surrounding areas.

Telegraph Road. Frontage improvements include widening of Telegraph Road along the project's frontage to provide two-travel lanes, parallel parking on both sides of the street, a bike lane on the south side of the street, a central median, and a 28-foot parkway on the north side of the street. The proposed parkway would provide a meandering bike lane and pedestrian path.

Wells Road (north of Citrus Drive). Improvements include widening the street to provide one travel lane in each direction with parallel parking and bicycle lanes on both sides of the street. A center median would also be installed along this segment.

Wells Road (South of Citrus Drive). Improvements including widening the roadway to provide two travel lanes in each direction, as well as parallel parking and bicycle lanes on both sides of the street. A center median would also be installed along this segment.

Blackburn Road. Blackburn Road would be realigned to connect to the project's main roadway approximately 100 feet west of Wells Road. Additional improvements would include construction of curb, gutter and sidewalk on Blackburn Road along the project's frontage.

Mitigation Measures. The impact would be less than significant without mitigation; therefore, mitigation is not required. Nevertheless, the following improvements are recommended along the plan area frontage, subject to review and approval of the improvement by the City's traffic Engineer.

- *It is recommended that the full access driveway proposed on Wells Road approximately 500 feet south of Telegraph Road be modified to accommodate turning and parking movements. These modifications should include provision of additional throat length and reconfiguration of the parking area directly west of the driveway connection to Wells Road.*

- *It is recommended that frontage improvements at the Wells Road/Carlos Street intersection include modification of the existing raised median on Wells Road to*

accommodate a northbound left-turn bay, which should contain 100 feet of vehicle storage and a 60 foot taper.

- *It is recommended that the eastbound approach (project parkway) of the Wells Road/Citrus Drive intersection retain its current lane geometry (a shared left-turn/through and a right-turn lane), which would provide better operations and reduce queue lengths compared to the proposed one-lane approach. This would require that the median on the parkway be modified to provide sufficient width for two lanes on the eastbound approach, or that the approach be widened.*

- *It is recommended that the median on Wells Road south of the Wells Road/Citrus Drive intersection be reconstructed to provide a minimum of 160 feet of storage in the northbound left-turn bay to avoid vehicles blocking through traffic on Wells Road.*

- *It is recommended that the two-lane divided parkway in the plan area be designed to accommodate a California Design Vehicle (WB 40 semi-truck). The secondary roadways should be designed to accommodate trash trucks and emergency vehicles.*

Significance after Mitigation. The impact would be less than significant without mitigation.

Impact T-4 Three of the study area intersections are contained in the County's Congestion Management Plan (CMP). Added project traffic would result in intersection levels of service to operate at LOS C or better. Therefore, impacts are Class III, *less than significant*.

The Wells Road/Telephone Road, SR 126 EB Ramps/Wells Road, and the SR 126 WB Ramps intersections are contained in the County's CMP. As shown in tables 4.9-8 and 4.9-9, the CMP intersections are forecast to operates at LOS C or better under year 2025 + project conditions. These operations are considered acceptable based on the County's CMP standards. Therefore, impacts would be less than significant.

Mitigation Measures. Impacts would be less than significant; therefore, no mitigation is required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact T-5 The proposed specific plan would result in additional traffic on SR 126 in the vicinity of the plan area. However, project generated and cumulative traffic increases would not result in a level of service below C, and mainline freeway operations would continue to operate smoothly. This is a Class III, *less than significant* impact.

Levels of service were calculated for the segment of State Route 126 adjacent to the Wells Road interchange using the operations method contained in the Highway Capacity Manual (LOS worksheet are contained in the Technical Appendix to the traffic report – see Appendix H).

There are three performance measures for freeway operation. Density in passenger cars per mile per lane (pc/mi/ln), mean passenger car speed (mph), and volume to capacity (v/c). Each of these measures is an indication of how the traffic is being accommodated. While the three measures are interrelated, level of service is based upon density (pc/mi/ln). Table 4.9-10 shows the existing and existing + project levels of service for the SR 126 freeway. Year 2025 and year 2025 + project levels of service are shown in Table 4.9-11.

Table 4.9-10
Existing and Existing + Project SR 126 LOS

Direction	Existing			Existing + Project		
	Speed(1)	Density(2)	LOS(3)	Speed(1)	Density(2)	LOS(3)
Eastbound	69.8	21.4	LOS C	69.7	22.1	LOS C
Westbound	70.0	17.4	LOS B	70.0	17.9	LOS B

(1) Speed = average speed in MPH.
(2) Density = passenger cars per mile per lane (pc/mi/ln).
(3) LOS based on density.

Table 4.9-11
Year 2025 and Year 2025 + Project SR 126 LOS

Direction	Year 2025			Year 2025 + Project		
	Speed(1)	Density(2)	LOS(3)	Speed(1)	Density(2)	LOS(3)
Eastbound	69.5	22.8	LOS C	69.3	23.5	LOS C
Westbound	70.0	18.5	LOS C	70.0	19.0	LOS C

(1) Speed = average speed in MPH.
(2) Density = passenger cars per mile per lane (pc/mi/ln).
(3) LOS based on density.

As shown in Table 4.9-10, the SR 126 freeway operations at LOS B-C during the peak hour period under Existing and Existing + Project condition. The analysis shows that the Parklands project would not significantly impact freeway operations under the existing + project scenario.

As shown in Table 4.9-11, SR 126 is forecast to operate at LOS C during the peak hour period under year 2025 and year 2025 + project conditions. The analysis shows that the proposed specific plan would not significantly impact freeway operations under the year 2025 + project scenario.

The SR 126/Wells Road interchange is a partial cloverleaf configuration, with free flow ramps for most of the movements. The levels of service shown in Table 4.9-7 (existing + project) and tables 4.9-8 and 4.9-9 (year 2025 + project) for the eastbound and westbound ramp terminals are based on the City's ICU method. To address Caltrans concerns, further review of the ramp intersections was completed using the operations method outlined in the Highway Capacity Manual using the SYNCHRO software program. The results of the analysis shows that the

ramp intersections are forecast to operate at LOS A-B with existing + project traffic. The 95th percentile queue for the SR 126 westbound off to northbound Wells Road movement, which is controlled by a stop sign, is forecast at 1-2 vehicles for the existing + project scenario. This queue would be easily accommodated on the off-ramp and would not affect mainline operations. The SR 126 westbound off-ramp to southbound Wells Road movement is free flow loop ramp (no control) and queues would therefore not form. The SR 126 eastbound off-ramp connection to Wells Road is controlled by a traffic signal. The 95th percentile queue is forecast at 6-8 vehicles on the off-ramp for the existing + project scenario, which would be accommodated on the ramp and not affect mainline operations.

The year 2025 + project operation analysis indicates that the ramp intersections are forecast to operate at LOS C or better. The 95th percentile queue for the SR 126 westbound off to northbound Wells Road movement, which is controlled by a stop sign, is forecast at 1-2 vehicles for the year 2025 + project scenario. This queue will be easily accommodated on the off-ramp and would not affect mainline operations. The SR 126 eastbound off-ramp connection to Wells Road is controlled by a traffic signal. The 95th percentile queue is forecast at approximately 15 vehicles on the off-ramp for the Year 2025+Project scenario. The off-ramp, which provides approximately 700 feet of storage area (approximately 30 vehicles), would accommodate the queues without affecting mainline operations.

Mitigation Measures. None required.

Significance After Mitigation. Impacts would be less than significant without mitigation

Impact T-6 The proposed project would introduce reduced parking requirements for the specific plan in certain cases. Provided that the specific plan is approved, parking supply would be developed according to the Development Code and adverse effects relating to parking supply would be Class III, *less than significant*.

The specific plan includes parking standards specific to the Parklands Development, which would be guided by the Development Code contained in the specific plan. Parking would be provided along streets, at residences and within the community use areas of the plan area. The parking standards in the specific plan reflect the parking supply ratios observed in traditional California downtowns, small towns, villages and neighborhoods. They allow for a mix of uses (for example, apartments above a shop), and for the creation of a compact, closely-knit neighborhood fabric. They also allow uses within a building to change easily over time, as a village center evolves. Traditional neighborhoods, with their network of small blocks, and parking allowed on both sides of most streets (including village main streets), are able to accommodate much of a neighborhood's parking demand on the street. On-street spaces also allow for more parking with less pavement, as streets serve as both access routes and parking aisles.

The specific plan allows for reduced parking requirements in the following cases:

- *In the COR zone, on-street parking along the frontage lines of the plan area shall be counted toward the fulfillment of these parking requirements.*
- *Each Live/Work Unit, including both its living space and working space, shall be counted as one dwelling unit.*

The specific plan would introduce parking requirements that apply to the plan area and allow for some variation in those requirements based on the types of uses proposed at the time of development. Provided that the specific plan is approved, parking supply would be developed according to the Development Code and adverse effects relating to parking supply would be less than significant.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The cumulative impacts associated with traffic are discussed under Impact T-2, which evaluates the 2025 future year conditions. As indicated in that discussion, cumulative impacts would be less than significant.

5.0 OTHER CEQA-REQUIRED DISCUSSIONS

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4.0, *Environmental Impact Analysis*. These additional issues include: (1) the potential to induce growth; and (2) significant and irreversible impacts on the environment.

5.1 GROWTH INDUCING EFFECTS

Section 15126.2(d) of the *CEQA Guidelines* requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. This section also mandates a discussion of the potential characteristic of the proposed project to facilitate other activities that could affect the environment, either individually or cumulatively.

5.1.1 Economic and Population Growth

As discussed in Section 2.0, *Project Description*, the Parklands Specific Plan proposes to develop 499 residential units in the Wells Community Area of the City of Ventura. The plan area is considered under "Sphere of Influence/Other Infill/Neighborhood Centers" in the predicted development intensity & pattern table in the 2005 General Plan (Table 3-2 in the "Our Well Planned Community" chapter). The Wells/Saticoy area is projected to accommodate a total of 1,050 residences by 2025. Current pending applications for the Saticoy Wells Area include 908 residential units (Saticoy Wells Housing Buildout, 9/2005). Therefore, with the addition of this project, planned and pending development within the Saticoy Wells Area exceeds the number of predicted residences by 357 residential units. However, the 2005 Ventura General Plan and SCAG predicts approximately 8,300 new citywide units by 2025. The proposed specific plan for development of 499 units would put Ventura still under its General Plan housing prediction. Figures estimating future growth in residential units are not development caps. Rather, these figures are merely estimates for future development used for analytical purposes. The project is consistent with the 2005 General Plan in respect to land use and zoning.

The 2005 General Plan includes various policies and actions intended to attract businesses to the City. Citywide job growth through 2025 is projected to range from about 14,000 to 20,000 jobs, which represents growth of about 26-37% over the current level of employment in the City. Such job growth is similar to SCAG forecasts for the City. The economic growth that could be accommodated under the 2005 General Plan would have economic benefits in terms of jobs and City tax revenues.

5.1.2 Removal of Obstacles to Growth

It is the specific purpose of the Parklands Specific Plan to create a traditional neighborhood that embodies the principles of New Urbanism that will emphasize the public realm, include pedestrian friendly streets and blocks, and provide a diversity of uses and building types to generate a distinct sense of neighborhood identity. Parklands will be the first Traditional Neighborhood Development in the City of Ventura challenging the usual pattern of suburban sprawl by bringing together New Urbanist ideals, city planning, and livable spaces.

Furthermore, the Parklands project is an infill project, meaning the proposed development will occur in an area already surrounded by built environment. This type of development is expected to generally reduce the potential for impacts relating to such issues as biological resources, regional traffic, and air quality as compared to continued low density development on undeveloped areas at the periphery of the City. The characteristics of the Parklands Specific Plan make the development a viable smart growth option to help accommodate for Ventura's projected future growth.

5.2 IRREVERSIBLE ENVIRONMENTAL EFFECTS

The CEQA *Guidelines* require that EIRs evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decisionmakers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed development.

Construction facilitated by the Parklands Specific Plan would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the City of Ventura or the General Plan. The addition of new residential and non-residential development in the City through 2025 would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies such as Live/Work options in the Parklands Specific Plan, are expected to offset the demand to some degree. It is not anticipated that growth accommodated under the Parklands Specific Plan would significantly affect local or regional energy supplies.

Implementation of the Parklands Specific Plan would convert Prime agricultural lands to non-agricultural uses. However, under Scenario 1 - Intensification/Reuse Only in Section 4.2 of the 2005 General Plan EIR, the plan area was included as one of a number of properties already designated for non-agricultural use under the previous Comprehensive Plan. During adoption of the 2005 Ventura General Plan and Housing Approval Program (HAP), the City Council considered the conversion of agricultural lands within the City's sphere of influence and determined that public benefits of the General Plan outweigh certain unavoidable adverse environmental effects, including the conversion of agricultural land. A Statement of Overriding Consideration was adopted. Therefore, the project would not have any significant impact to agricultural lands beyond that identified in a prior impact assessment and documented in the certified 2005 General Plan FEIR.

Additional vehicle trips associated with growth through 2025 would incrementally increase local traffic and noise levels and regional air pollutant emissions. Project development has the potential to expose sensitive receptors to noise levels exceeding the normally acceptable range for single family and multiple family residential uses. Implementation of proposed policies and actions, in combination with the additional recommended action, could reduce the noise impacts associated with future growth to a less than significant level. As discussed in Section 4.9, *Traffic and Circulation*, the proposed intersection level of service performance standards

would be met at all locations. Specific plan build out would generate a cumulative impact at the Darling Road/Wells Road intersection during the P.M. peak hour. The intersection will operate at LOS D assuming the prescribed mitigation measures are implemented. As discussed in Section 4.02, *Air Quality*, the Parklands Specific Plan will implement mitigation measures to reduce air emissions associated with the project. Such mitigation measures would include requiring energy efficiency standards 20 percent beyond Title 24 requirements for commercial and residential buildings within the project to partially offset the operational emissions. The Parklands project would also be required to contribute towards an air Quality Mitigation fund to be used to develop regional programs to offset air pollutant emissions associated with implementation of the specific plan.

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6.0 ALTERNATIVES

As required by Section 15126.6 of the *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed specific plan. However, it should be emphasized that the proposed specific plan would not result in any unavoidably significant impacts. The proposed specific plan would require annexation of land that is currently within the County and would involve culverting a 725 linear foot section of Brown Barranca, both of which are actions subject to outside approvals. Therefore, because there were no alternatives that would result in a reduction of unavoidably significant impacts, this alternatives analysis explores the No Project Alternative, an Existing General Plan/Zoning Alternative, and a Barranca Avoidance Alternative.

The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project (no development - no change to existing land uses)*
- *Alternative 2: Existing General Plan/Zoning Alternative*
- *Alternative 3: Barranca Avoidance. This alternative would leave the barranca in its current state.*

Table 6-1 provides a summary comparison of the development characteristics of the proposed specific plan and the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative.

Table 6-1
Comparison of Project Alternatives' Buildout Characteristics

Characteristic	Proposed Specific Plan	Alternatives		
		1	2	3
		No Project – No Build	Existing General Plan/Zoning	Barranca Avoidance
Residential Density	~7.48 units/acre (499 units)	AE -40 AC - one caretaker mobile home	R-1-7 ~7 units/acre (91 Units)	~7.19 units/acre (480 Units)
Commercial Square Footage	Up to 25,000 square feet	None	None	Up to 25,000 square feet
Barranca Modifications	725 Linear Feet Culverted	None	None	None
Remaining Agricultural Production	None	67 acres	54 acres	None

6.1 ALTERNATIVE 1: NO PROJECT – NO BUILD

This alternative assumes that the proposed improvements are not implemented and that the existing agricultural operations continue. It should be noted that implementation of the No Project alternative would not preclude future development within the specific plan area.

The No Project alternative would avoid the proposed specific plan's environmental impacts in every issue area studied in the EIR except for treatment of contaminated soils and groundwater demand. Under this alternative, pesticide use and drawing of groundwater would continue. These impacts would be reduced with implementation of the proposed specific plan. The proposed specific plan would require treatment of contaminated soils and asbestos containing materials, and would cease to involve application of agricultural pesticides.

The No Project Alternative would also not achieve two objectives of the specific plan: 1) alleviation of existing flooding at the Blackburn Road undercrossing where the existing double box culvert is deficient by 304 cubic feet/second under a 100-year storm condition; and 2) development of the Carlos Street extension as a collector street through the plan area that would eventually link Wells Road and Saticoy Avenue (as illustrated on the Roadway Classification Plan of the 2005 General Plan).

Despite avoiding most of the environmental impacts of the proposed specific plan, the No Project Alternative would not provide new housing opportunities in the City of Ventura. Moreover it is noted that the proposed specific plan does not have any project-specific impacts that cannot be mitigated to a less than significant level.

6.2 ALTERNATIVE 2: EXISTING GENERAL PLAN/ ZONING

This alternative would involve development under the existing County of Ventura General Plan and Zoning Designations. About 54 acres of the plan area are currently within the County. The County lands are currently zoned AE-40 and have a General Plan designation of Agricultural Urban Reserve - 40 Acre minimum. This alternative assumes that these 54 acres would remain in agricultural production as they are today. About 13 acres are currently within the City of Ventura and are zoned R-1-7 with a General Plan designation of Neighborhood Low 0-8 du/acre. This alternative assumes that buildout of these 13 acres would have a maximum density of 7 units/acre as allowed under the zoning ordinance, and would result in development of 91 units. This alternative would not involve modifications to the Barranca and would not involve development of commercial uses.

It is noted that the 54-acres that are currently within the County have an Urban Reserve General Plan overlay designation, which specifies that the property is intended for eventual annexation. This alternative would not preclude some eventual future development pursuant to the City's Neighborhood Low 0-8 du designation, should annexation be sought. Maximum allowable residential density for these 54 acres would be an additional 432 dwelling units.

6.2.1 Aesthetics

Under this alternative, views of the plan area from SR 126 and Wells Road would be altered, similar to what would occur under the proposed specific plan, since the 13 acres that would be developed with residential uses are situated along the southern and eastern boundaries of the plan area adjacent to SR 126/Blackburn Road and Wells Road. It is likely the same 7-8 foot tall garden wall would need to be constructed along the southern boundary of the plan area to attenuate noise within exterior usable spaces, as with the proposed specific plan.

From the SR 126 and Wells Road vantages, the viewer would see 1-2 story residential development, similar to what would occur under the proposed specific plan. However, views of the mountains in the background would remain visible, the same as with the proposed specific plan. The impacts with respect to views from visually sensitive corridors would be less than significant.

Under this alternative, views of agricultural land would remain from Telegraph Road, but not from SR 126 or Wells Road. Views from Wells Road and SR 126 would still involve alteration of the visual character of the plan area; however the change would not be visually offensive, and the impact would be less than significant. Overall, the change in visual character would be lower under this alternative as 54 of the 67 plan area acres would remain in agricultural production.

6.2.2 Air Quality

Temporary impacts to air quality resulting from construction of this alternative would be lower than with the proposed specific plan. Since this alternative would develop roughly 20% of the units proposed under the specific plan, construction emissions would be reduced by about 80%. The same standard dust control mitigation would apply, and, as with the proposed specific plan, the impact would be less than significant.

Operational emissions would not exceed Ventura County APCD thresholds and no mitigation measures would be necessary. This alternative would result in about 20% of the emissions that would result from buildout of the proposed specific plan or about 15 lbs of ROG per day as compared with the 66 lbs of ROG per day that would be produced at full buildout of the specific plan. Emissions of NOx would be similarly reduced to 9 lbs per day from the 50 lbs per day that would be associated with full buildout of the specific plan.

This alternative would be anticipated to result in continued farming practices on the 54 acres that would remain in agricultural production. The area produces row crop flowers that involves tilling and would be anticipated to continue to involve application of pesticides and herbicides. These agricultural practices would continue to expose existing nearby receptors and future residential receptors to particulate matter and pesticides or herbicides, some of which could have adverse health effects. This is a potentially adverse effect that could be mitigated through implementation of appropriate buffers between residences and agricultural operations.

6.2.3 Biological Resources

Because this alternative would not include modifications to Brown Barranca, the potential for adverse effects to biological resources would be reduced. This alternative would result in no impacts to riparian vegetation, wildlife or wetlands and biological resource impacts would be less than significant. The biological resource impacts associated with development under the proposed specific plan would be significant, but mitigable. It should be noted that this alternative would not include the barranca restoration that would occur under the proposed specific plan.

6.2.4 Cultural Resources

Grading would be reduced under this alternative, as development would be limited to 13 acres instead of the 67 acres that would be developed under the proposed specific plan. Nevertheless, potential impacts to unrecorded archaeological resources would be the same as for the proposed specific plan, and mitigation measures recommended for the proposed specific plan for unexpected discovery of such resources would apply. This alternative would significant, but mitigable impacts similar to those of the proposed specific plan.

6.2.5 Hazards

The plan area has several different hazards due to the presence of an underground storage tank, soils contaminated with pesticides, and asbestos cement. This alternative would maintain agricultural production in the northwest corner of the plan area, where soils are contaminated with pesticides. The ongoing agricultural operations would not require removal of these soils; therefore mitigation measure HAZ-1 would not apply though these soils could still be dispersed by wind and water, which is adverse due to the presence of residential receptors surrounding the plan area.

Mitigation measures for removal of the underground storage tank and asbestos cement would apply as these hazards are present within areas where development of the 91 residences would occur. This alternative would have significant, but mitigable impacts with respect to hazards, the same as with the proposed specific plan.

6.2.6 Drainage and Flood Hazards

This alternative would not construct the barranca improvements at the Blackburn Road undercrossing to alleviate the existing flooding impact at Blackburn Road. It is noted that this alternative could include such an improvement, but that biological resource impacts would also result. If no improvements were constructed, portions of the developable area would be within the 100-year flood zone (see updated 100-year flood zone delineation on Figure 4.6-1) and residential units would need to be constructed outside of the flood hazard area. The impacts with respect to Flood Hazards would be less than significant if structures were sited outside of the 100-year flood zone. The impact would be significant, but mitigable if barranca improvements were incorporated to reduce the flood hazard within the developable area, the same as for the proposed specific plan. This alternative would include similar drainage features to comply with City requirements and the impacts would similar to those of the proposed specific plan.

6.2.7 Land Use and Planning

This alternative would not achieve extension of Carlos Street through the plan area, as that extension would bisect agricultural operations. Thus, this alternative would not achieve the City's objective of creating that Carlos Street roadway extension to connect Wells Road and Saticoy Avenue as indicated on the Roadway Classification Plan of the 2005 General Plan. Additionally, the 54 County acres would not be annexed to the City as part of the infill strategy that was chosen above expanding the City's boundaries on the periphery of the City.

This alternative would not result in extension of the linear park system and would not create mixed uses at the southeast corner of Telegraph Road and Wells Road. This alternative could be found to be consistent with applicable policies of the 2005 General Plan, but would not implement the goals and policies of the 2005 General Plan to the degree that the proposed specific plan would through provision of a walkable, higher density mixed use neighborhood with parks, trails and peripheral pedestrian, bicycle and vehicular circulation improvements to Telegraph Road and Wells Road that would benefit the community as a whole.

6.2.8 Noise

Construction noise would be lower than under the proposed specific plan, but compliance with the City's noise ordinance would reduce impacts to a less than significant level. This alternative would produce less traffic than the proposed specific plan, and would thus produce less traffic-generated noise, though traffic generated noise from the proposed specific plan would be less than significant. Like the proposed specific plan, residences along the southern boundary of the plan area would require a 7-8 foot garden wall along the north side of Blackburn Road, with interior noise attenuation for those residences closest to Blackburn Road/SR 126 due to freeway generated noise in excess of the residential standards. Residences closest to Wells Road and Telegraph Road would likewise require orientation such that exterior usable spaces are either shielded by the proposed structures, with noise attenuating construction or would require construction of a sound wall to ensure that exterior spaces do not exceed the allowable noise levels of 65 dBA. The same mitigation measures applied to the proposed specific plan would apply to this project. This alternative would expose residences to noise associated with agricultural operations, which could mean the use of tractors for tilling, planting, harvesting and spraying, which would not occur with the proposed specific plan.

6.2.9 Traffic and Circulation

This alternative would generate fewer trips than the proposed specific plan. Assuming 91 single family residences, this alternative would generate 871 average daily trips (ADT), which is 4,687 fewer trips (84% reduction) as compared to the proposed specific plan. As with the proposed specific plan, this alternative's impact to the local circulation system would be less than significant.

6.3 ALTERNATIVE 3: BARRANCA AVOIDANCE

This alternative would involve avoidance of the barranca as this was a recommendation made by the Department of Fish and Game in response to the Mitigated Negative Declaration that was previously issued for the proposed specific plan. This alternative would reduce impacts to

biological resources, primarily riparian and wetland habitat that would be affected by the culverting of 725 linear feet of the barranca. The Barranca Avoidance Alternative assumes a slight reduction in units (19 fewer) as those residential units that would be situated within the updated 100-year flood zone as shown on Figure 4.6-1 would not be constructed. This alternative assumes that the specific plan would still involve development of up to 25,000 square feet of commercial use, but that the Carlos Street extension would not be constructed as it is dependent on culverting of the barranca.

6.3.1 Aesthetics

Under this alternative, because the overall layout of development would be roughly the same as under the proposed specific plan, aesthetic impacts would be similar to those of the proposed specific plan. Impacts relating to the freeway sound wall could be reduced to below a level of significance with the mitigation measure recommended to the proposed specific plan.

6.3.2 Air Quality

Under this alternative, impacts would be about similar to, but slightly lower than, those of the proposed specific plan because the level of development would be slightly lower. Both construction and operational impacts would be reduced slightly; however, the same mitigation measures relative to payment of Transportation Demand Management fees would apply.

6.3.3 Biological Resources

Because this alternative would not include modifications to Brown Barranca, the potential for adverse effects to biological resources would be reduced. This alternative would result in no direct impacts to riparian vegetation, wildlife or wetlands and biological resource impacts would be less than significant. The biological resource impacts associated with development under the proposed specific plan are classified as significant, but mitigable. It should be noted that this alternative would not be expected to include the barranca restoration program that is part of the proposed specific plan.

6.3.4 Cultural Resources

The development footprint would be about the same as that of the proposed specific plan, but would involve about 19 fewer residential units. Potential impacts to unrecorded archaeological resources would be the same as for the proposed specific plan, and mitigation measures recommended for the proposed specific plan for unexpected discovery of such resources would apply. This alternative would have the same significant, but mitigable impacts as the proposed specific plan.

6.3.5 Hazards

The plan area has several different hazards due to the presence of an underground storage tank, soils contaminated with pesticides, and asbestos cement. Because the level of development with this alternative would be about the same as with the proposed specific plan and all of the same areas would be disturbed, this alternative would have impacts and mitigation measures similar to those of the proposed specific plan.

6.3.6 Drainage and Flood Hazards

This alternative would not include the barranca improvements at the Blackburn Road undercrossing to alleviate the existing flooding impact at Blackburn Road. The impacts with respect to Flood Hazards would be less than significant providing that structures would be sited outside of the 100-year flood zone. This alternative would include similar drainage features to comply with City requirements and the impacts would be the same as for the proposed specific plan and would be less than significant.

It should be noted that under this alternative, flooding along Blackburn Road would continue to occur, whereas under the proposed specific plan, that impact would be reduced as compared with what currently occurs (see Figure 4.6-1, Updated and Proposed 100-Year Flood Plains).

6.3.7 Land Use and Planning

This alternative would not achieve extension of Carlos Street through the plan area, as that improvement is dependent on culverting the 725 linear foot section of Brown Barranca. Therefore, this alternative would not achieve the City's objective of creating the Carlos Street roadway extension to connect Wells Road and Saticoy Avenue as indicated on the Roadway Classification Plan of the 2005 General Plan. This alternative would, however, be consistent with other goals and policies pertaining to infill development, creation of mixed use walkable neighborhoods in close proximity to transit and with pedestrian and bicycle amenities. This alternative would have similar less than significant land use and planning impacts.

6.3.8 Noise

This alternative would have the same noise impacts as the proposed specific plan due to the similar development intensity and layout. Noise impacts would be less than significant for construction and due to project generated traffic. Impacts relating to exposure of future residents to noise would be the same as under the proposed specific plan and mitigation measures regarding interior construction materials as well as garden wall construction would apply.

6.3.9 Traffic and Circulation

This alternative would generate slightly fewer trips than the proposed specific plan (about 4% fewer trips). This alternative's impacts to the local circulation system would be similar to those of the proposed specific plan and would be less than significant. This alternative would not involve the extension of Carlos Street through the plan area as would occur with the proposed specific plan; therefore, some of the traffic shown to utilize this intersection would be re-distributed to other intersections on the periphery of the plan area such as Citrus Drive. However, since all project-generated traffic impacts were determined to be less than significant, the redistribution is not likely to cause a significant impact. This alternative's effects would be about the same as those of the proposed specific plan.

6.4 ALTERNATIVE SITES

The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicated that a discussion of alternative sites is needed if the project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site. As suggested in *Goleta*, several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. *Could the size and other characteristics of another site physically accommodate the project?*
2. *Is another site reasonably available for acquisition?*
3. *Is the timing of carrying out development on an alternative site reasonable for the applicant?*
4. *Is the project economically feasible on another site?*
5. *What are the land use designation(s) of alternative sites?*
6. *Does the lead agency have jurisdiction over alternative sites? and*
7. *Are there any social, technological, or other factors that may make the consideration of alternative sites infeasible?*

Other sites that could physically accommodate the proposed specific plan may be present in Ventura, and some sites have land use designations that would accommodate the general scale of the proposed specific plan. However, one of the fundamental objectives of the proposed specific plan is to design the project around Brown Barranca with the barranca as a focal point of the project. Moreover, the project is sited to develop this southwest corner of Telegraph Road at Wells Road with mixed uses thereby expanding the Wells Corridor westward towards the edge of the barranca. The specific plan at this location would be a key to shaping the future development pattern of the area to create walkable, bikeable neighborhoods with ample recreational, residential and commercial opportunities. Relocating the project to another site would not achieve this objective. Moreover, the applicant does not have access to other sites and has already made a substantial investment in the current project site. Therefore, relocating the project to another site would not be feasible from either an economic or timing standpoint. Consequently, because relocation of the project to an alternative site is not feasible, discussion of the impacts of alternative sites is not warranted.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-2 shows a comparison of the environmental effects of each alternative in the issue areas that were covered in the EIR. The No Project Alternative would avoid most of the proposed specific plan's adverse impacts. However, the No Project Alternative would not remediate all of the existing hazards, including soil that has been contaminated with pesticides, would not improve the existing flooding hazard at Blackburn Road/Wells Road, and would not construct the Carlos Street Extension from Wells Road through the plan area. Moreover, the No Project Alternative would not eliminate the potential for future development proposals within the plan area.

Among the other alternatives, the Existing General Plan and Zoning Alternative would have reduced air quality, hazards, noise and traffic effects due to the reduction in units (82% reduction). It would also avoid impacts to biological resources within Brown Barranca, though

it also would not include the proposed restoration of the barranca. This alternative could have secondary adverse effects because of other air quality impacts from tilling (suspended particulate matter) and pesticide/herbicide use, in addition to not remediating the existing soil contamination hazard in the northwestern corner of the plan area. This alternative also would not facilitate the Carlos Street extension, nor would it repair existing deficiencies at the Brown Barranca undercrossing. Moreover, this alternative would not prevent future annexation and development of the County portions of the plan area as both the City's land use designation and the County's land use designation acknowledge that the area is intended for eventual annexation to the City. Later annexation of these 54 acres could result in development of up to 432 additional residences.

Table 6-2
Comparison of Environmental Impacts of Alternatives

Issue	Proposed specific plan	No Project No Build	Existing General Plan/Zoning	Barranca Avoidance
Aesthetics	=	+	=	=
Air Quality	=	+	+ / -	=
Biological	=	+ / -	+ / -	+ / -
Cultural Resources	=	+	=	=
Hazards	=	-	+ / -	=
Drainage and Flood Hazard	=	- / =	- / =	- / =
Land Use	=	-	-	- / =
Noise	=	+	= / +	=
Transportation/Traffic	=	+	+	=

+ Superior to the proposed specific plan
- Inferior to the proposed specific plan
= Similar impact to the proposed specific plan

The Barranca Avoidance Alternative could be considered superior to the proposed specific plan with respect to reducing impacts to biological resources, though it also would not include the proposed barranca restoration. This alternative would be inferior with respect to drainage/ flooding and land use because the barranca modifications are necessary to alleviate an existing flood hazard along Blackburn Road at Wells Road and to facilitate extension of Carlos Street through the plan area.

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7.0 REFERENCES AND REPORT PREPARERS

7.1 REFERENCES

7.1.1 Bibliography

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7.1.2 Persons Contacted

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This EIR was prepared by the City of Ventura with the assistance of Rincon Consultants, Inc., Padre Associates, Inc., Earth Systems Southern California, Hawks and Associates. Cori Thomas, Senior Planner, managed the preparation of the EIR for the City. Consultant staff involved in the preparation of the EIR are listed below.

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8.0 ADDENDA and ERRATA/ RESPONSES to COMMENTS

8.1 ADDENDA and ERRATA

This section of the Final EIR (FEIR) for the Parklands Specific Plan presents modifications to the Draft EIR (DEIR) text based on comments received and the City's responses, which are included below in Section 8.2. Deletions are noted by ~~strikeout~~ and insertions by <u>underline</u>. Individual typographical corrections are not specifically stated.

CEQA Guidelines §15088.5(a) states that when new information is provided on a project, a lead agency is not required to recirculate an EIR "…unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." The changes incorporated into this EIR involve clarifications resulting from comments received from the applicant, staff, and the public. The changes do not result in presentation of new substantial adverse environmental effects that cannot be mitigated by existing mitigation.

The following paragraph was added at the end of subsection 1.1 of Section 1.0, Introduction, in response to comment 7.1.

<u>In accordance with Section 15152 of the CEQA Guidelines, this EIR tiers off of the 2005 General Plan Final EIR that was originally certified by the City of Ventura in August 2005 and for which an EIR Supplement was approved in July 2007. The 2005 General Plan EIR is incorporated by reference.</u>

The following change to the discussion of impacts to Telegraph Road on page 4.1-8 of Section 4.1, *Aesthetics*, was made in response to comment 10.52.

<u>Telegraph Road</u>. With respect to Telegraph Road, the proposed development would occur south of Telegraph Road, whereas the <u>closest</u> hillsides lie to the north. <u>The distant hillsides to the south and east would be partially obscured by plan area development; however, the hillsides to the southeast are more than two miles away and, therefore, are not prominent visual features from Telegraph Road.</u> Thus, although the proposed development would alter the character of views to the south by converting agricultural land to residential use, it would not obstruct views of the hillsides to the north. Consequently, the visual effect of plan area development along the Telegraph Road corridor would be less than significant.

The following information discussed under Section M.3 of the Initial Study in Appendix A was changed in response to Comment 3.5.

As discussed above under L.1, current pressure deficiencies in the Wells and Saticoy areas are being addressed through City planned improvements and additional water supply in the Saticoy area would be provided for planned growth under the 2005 General Plan through development of Saticoy Well #3 ~~(also called the Saticoy Yard Well, planned for operation in late 2009)~~.

The following change was made in the Water Supply Assessment (Appendix I) in response to Comment 3.7.

The City of Ventura obtains its water from several sources, including the Ventura River, Casitas Municipal Water District, ~~United Water Conservation District,~~ the Mound Groundwater Basin, the Oxnard Plain Groundwater Basin, the Santa Paula Groundwater Basin, and the Saticoy Yard Well.

The following change was made in the Water Supply Assessment (Appendix I) in response to Comment 3.8.

If approved, the proposed project would be served by the City of Ventura, which obtains water from various sources including the Ventura River, Casitas Municipal Water District, the Mound Groundwater Basin, the Santa Paula Groundwater Basin, the Oxnard Plain Groundwater Basin, and the Saticoy Yard Well (~~United Forebay Basin~~ Oxnard Forebay Basin).

8.2 COMMENTS and RESPONSES

This section of the FEIR for the Parkland Specific Plan Project contains all of the written comments received in response to the DEIR during the 45-day public review period of December 5, 2008 through January 20, 2009. Each comment received by the City of Ventura has been included within this report. Responses to all comments have been prepared to address the concerns raised by the commenters and to indicate where and how the EIR addresses environmental issues. Changes that were made to the EIR in response to comments are outlined in the beginning of this section under Addenda Errata.

This document constitutes the FEIR to be presented to the City of Ventura Planning Commission for certification prior to decisions on acceptance and approval of the Parklands Specific Plan.

Specific comments contained within any particular written letter have been numbered in order to provide a reference to it in the response. Each letter is presented first, followed by responses.

	Commenter	Page
1.	Edmund J. Pert, Regional Manager, South Coast Region, State of California, Department of Fish and Game	8-4
2.	Reed V. Smith, Science Chair, Ventura Audobon Society	8-8
3.	E. Michael Solomon, General Manager, United Water Conservation District (January 14, 2009)	8-12
4.	E. Michael Solomon, General Manager, United Water Conservation District (November 20, 2008)	8-18
5.	Kimberly L. Rodriguez, County Planning Director, County of Ventura Resource Management Agency	8-24
6.	Jim Myers, Engineering Manager II, County of Ventura Public Works Agency	8-26

Commenter	Page
7. Kai Luoma, Deputy Executive Officer, Ventura Local Agency Formation Commission (LAFCO)	8-28
8. Nazir Lalani, Deputy Director, County of Ventura Public Works Agency, Transportation Department	8-32
9. Alicia Stratton, Ventura County Air Pollution Control District	8-36
10. Daniel Cormode, East Ventura Community Council	8-38

State of California – The Resources Agency ARNOLD SCHWARZENEGGER, Governor

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Letter 1

RECEIVED
JAN 22 2009
Community Development
PLANNING DIVISION

January 16, 2009

Mr. Iain Holt
City of Buenaventura
Community Development Department
501 Poli Street
Ventura, California 93002

Subject: Notice of Completion of a Draft Environmental Impact Report for the Parklands Specific Plan and Tentative Tract Map SCH # 2008031082, Ventura County

Dear Mr. Holt:

The Department of Fish and Game (Department) has reviewed the November 2008 updated Draft Environmental Impact Report (DEIR) for the Parklands Specific Plan. The proposed project is the development of a 66.7-acre eight-parcel area in the Wells Community. The primary objective of the proposed Parklands Specific Plan is to create a financially viable traditional neighborhood that embodies the principles of New Urbanism through emphasizing the public realm, creating pedestrian friendly streets and blocks, and providing a diversity of uses and building types that will generate a distinct sense of neighborhood identity. The project includes annexation of three parcels currently under agriculture production from the County to the City. The proposal outlines the development of 499 total residential units, a 6,560 square foot community center, a 25,000 square foot commercial/retail space, and approximately 11.62 acres of open space along Brown Barranca. Brown Barranca includes approximately 1,660 linear feet of quality riparian habitat. The proposal is to maintain 860 feet within Brown Barranca and approximately 725 feet of riparian stream would be modified and placed underground in three box culverts. Native trees will be planted on the surface adjacent to a constructed stream and above the historic channel. 1.1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under the California Environmental Quality Act (CEQA), Section 15381 over those aspects of the proposed project that come under the purview of Fish and Game Code Section 1600 et seq. regarding impacts to streams and lakes.

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the City of San Buenaventura to minimize impacts to fish and wildlife resources with a focus on these stressors.

The Department appreciates the revisions made to the DEIR and inclusion of Staff recommendations to minimize biological impacts to below a level of significance. The Department concurs with the mitigation measures developed to minimize impacts on biological resources.

The following mitigation measures are detailed in the DEIR. Edits have been made to BIO 1(a) and BIO 2(b). In BIO 1(a) the Department requests consultation with Department staff if any sensitive species are observed during the pre-construction surveys and prior to any translocation efforts. As you are aware, all Federal or State listed species, such as the Federally listed threatened California red-legged frog, need a take permit prior to relocation activities. In BIO 2(b) the Department requests consultation when assessing off-site mitigation lands and also requests the opportunity to review the native plant restoration plan 30 days prior to implementation.

The following mitigation measures are excerpts from the DEIR and would reduce the potential for adverse effects to special status species and habitats to a less than significant level.

BIO-1(a) Pre-Construction Surveys. A qualified biologist shall conduct pre-construction field surveys for arroyo chub, southwestern pond turtle, two-striped garter snake, San Diego mountain kingsnake, California red legged frog. If observed, these species shall be relocated to suitable habitat areas up or downstream of the plan area. The Department requests that Department staff be consulted if any sensitive species are observed during the pre-construction surveys in order to develop a prudent plan of action.

BIO-1(b) Construction Timing. Work within 500 feet of Brown Barranca shall be planned to avoid the breeding bird season if feasible, which generally runs from March 1 to August 31, as early as February 1, for raptors. If avoidance of the breeding bird season is infeasible, BIO-1(c) shall be implemented.

BIO-1(c) Nesting Bird Surveys. If avoidance of the breeding bird season is not feasible, beginning 30 days prior to the disturbance of suitable nesting habitat, the project proponent should arrange for weekly bird surveys to detect protected native birds occurring in the habitat that is to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allow. The surveys shall be conducted with emphasis on Cooper's hawk, yellow warbler, yellow-breasted chat, Allen's hummingbird, California horned lark and other riparian-dependent special-status bird species. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If a protected native bird is found, the project proponent shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet of raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and the juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel shall be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. 1.1

The following mitigation measures would reduce the project's adverse effects on wetlands to a less than significant level under CEQA.

BIO-2(a) Invasive Plant Removal. The applicant shall remove invasive or nonnative plants from the Brown Barranca Preserve area, including (but not limited to) castor bean, German ivy, garden blackberry, tree tobacco, garden nasturtium, and palm trees.

BIO-2(b) Wetland Creation. The applicant shall mitigate the removal of riparian vegetation (Department defined wetlands) at a minimum ratio of 1:1. The mitigation may be done on-site by increasing the area of the Brown Barranca preserve where feasible to eliminate landscape specimens and incorporate native riparian species between the bikepath/footpath and the preserve such that the total area of the preserve is increased by 0.27 acres or the applicant may mitigate off-site through in-kind mitigation banks within the same watershed subject to review and approval by the Planning Division or their designee. Please consult with Department staff when considering off-site mitigation and please provide a copy of the native plant restoration planting plan for review 30 days prior to implementation.

BIO-2(c) Barranca and Basin Maintenance Plan. The applicant shall develop and implement a maintenance plan to assure that future maintenance of the detention basin, Brown Barranca and associated slopes for permanent erosion control measures, which will minimize adverse effects to vegetation and promote maturation of wetland vegetation.

And the following mitigation measures would reduce the projects effect on wildlife in the Brown Barranca preserve would be less than significant. 1.1

BIO-3(a) Proper Erosion Control Device Installation. The applicant shall install erosion control devices in areas that have the potential to drain to Brown Barranca throughout the construction duration and prior to vegetation establishment. These devices should include silt fencing, sandbags, straw wattles, and/or straw bales.

BIO-3(b) Split-Rail Fencing. The applicant shall install aesthetic (split-rail) fencing between the proposed footpath and Brown Barranca to reduce disturbance of habitat.

BIO-3(c) Biological Resource Signage. The applicant shall provide signage and written materials to all property owners describing biological resources and prohibiting entry into the Brown Barranca Preserve.

BIO-3(d) Oil/Grease Traps. The applicant shall fit inlets of all storm drains with easily accessible trash excluders approved for use by the City and the Regional Water Quality Control Board. Low Impact Development (LID) principles established in the City's Municipal (MS4) Stormwater Permit shall be used to manage street runoff to meet stormwater quality objectives. Other than litter exclusion, stormwater quality objectives shall not be accomplished in the storm drain inlets. Rather, the objectives shall be accomplished through LID practices.

If there are any future proposed changes to the detailed biological mitigation measures provided in the November 2008 DEIR, please contact Department staff for concurrence. Thank you again for this opportunity to provide comments and for working with Department Staff on developing biological mitigation measures. Questions regarding this letter and project consultation during pre-construction surveys should be directed to Mr. Dan Blankenship, Staff Environmental Scientist, at (661) 259-3750.

Sincerely,

Theresa A. Stewart

for Edmund J. Pert
Regional Manager
South Coast Region

cc: Ms. Helen Birss, Los Alamitos
Betty Courtney, Newhall
Dan Blankenship, Newhall
Jeff Humble, Ventura
State Clearinghouse, Sacramento

Letter 1

COMMENTER: Edmund J. Pert, Regional Manager, South Coast Region, State of California, Department of Fish and Game

DATE: January 16, 2009

Response 1.1

The commenter concurs with the mitigation measures developed to minimize impacts on biological resources. No response is necessary.

Letter 2

The Ventura Audubon Society, Inc.

P.O. Box 24198, Ventura, CA 93003 www.venturaaudubon.org

January 12, 2009

RECEIVED
JAN 14 2009
Community Development
PLANNING DIVISION

City of SanBuenaventura
Planning Division
Attn: Iain Holt
501 Poli Street
Ventura, CA 93002

Dear Mr. Holt,

The Ventura Audubon Society has the following comments on Draft EIR for EIR-2459 regarding the development proposed for the corner of Telegraph and Wells Roads.

We have the following concerns:

Currently this portion of Brown Barranca is a valuable riparian wildlife habitat. It consists of a willow woodland up to 160' wide, bordering a stream. The stream flow is maintained by agricultural water from the adjacent farm land which in turn supports the woodland growth. Irrigation water enters the stream through runoff and subsurface contribution. The change in land use from agriculture to residential and its effect on water in the stream has not been considered in the DEIR and we believe that the change will reduce the water available to the riparian forest. (Storm events were considered, but no consideration was given to the water availability during the majority of the year.) A reduction in water in the stream will result in severe reduction of the riparian forest. 2.1

The DEIR states that Brown Barranca will be a "No Entry" Preserve area, yet inadequate fencing is called for as mitigation. The DEIR recommends a low split rail fence to help keep people out of the stream course. Such a fence would not stop people, dogs and cats from entering the area. Adequate fencing would be such that it would prohibit the entry into the area by people as well as dogs and cats that accompany residential development. The USFWS has identified the presence of domestic cats as being a major factor in reducing bird populations in and near residential developments. 2.2

Up to 90% of birds use riparian areas at some point in their life. Many use riparian areas as migration stopovers during spring and fall. There are many species that nest in riparian forests. There are some species that are tied to

riparian areas for nesting. Least Bell's Vireo, Southwestern Willow Flycatcher and Yellow-billed Cuckoo are three species that are endangered specifically because of the loss of riparian forest through development of lands adjacent to streams. Any loss of current riparian forest areas is unsupportable.

Therefore we recommend that Alternative No. 1 – No Project be adopted. The City can seek new housing opportunities in areas without such significant adverse impacts to the environment. 2.3

Please feel free to contact me with any questions regarding these comments at (805)652-0706.

Reed V. Smith, Science Chair
Ventura Audubon Society

Letter 2

COMMENTER: Reed V. Smith, Science Chair, Ventura Audobon Society

DATE: January 12, 2009

Response 2.1

The commenter states that Brown Barranca supports a valuable riparian habitat that supports woodland growth and receives stream flow from existing agricultural land. The commenter further states an opinion that the change in land use may reduce water available to the riparian forest.

The depth to groundwater in the vicinity of the site ranges from 3.5 feet below the ground surface in the central area of the site, to about 10 feet in the southern area, to about 14 feet in the north-central part of the site, to more than 50 feet near the northern property line (Geotechnical Engineering Report for Parklands, October 6, 2005). Brown Barranca ranges from about 25-50 feet deep (Earthsystems Southwest, November 26, 2006). Though surface water flows within Brown Barranca are intermittent, groundwater at these variable depths, flowing in the same general direction as the topography (southeast), would be anticipated to surface within the barranca, which varies in depth from about 25-50 feet.

It is acknowledged that the site currently contains agricultural wells and irrigated crops. Under the proposed specific plan, the hydrological design involves a network of open vegetated swales with infiltration trenches along parkways [see Figure 4.30 of the Parklands Specific Plan (March 2008)]. The infiltration trenches would capture water and facilitate percolation into the ground. The plan area also includes depressed turf areas that function as mini-detention, filtration, and sediment dropout areas [see Figure 4.30 of the Parklands Specific Plan (March 2008)], also designed to facilitate infiltration into the ground. Figures 4.31 and 4.32 {Parklands Specific Plan (March 2008)] also show open vegetated swales along the barranca edge and along the Central Parkway, both of which would serve to capture runoff and facilitate percolation into the ground. The hydrologic system of the plan area would function to preserve percolation into the ground for both landscape irrigation water and natural rainfall. As discussed in the DEIR, the project includes 11.62 acres of green space, in addition to the landscaped yards of each of the homes and complexes. These vegetated areas would allow for percolation into the ground, natural recharge of the groundwater basin beneath the 66.7-acre plan area and surface flows within Brown Barranca due to topography and groundwater flows.

Response 2.2

The commenter states an opinion that a low split rail fence, as required in the DEIR, would not stop people, dogs, and cats from entering the barranca and asserts that cats reduce bird populations.

The plan area is about 67 acres, but is surrounded by development. The barranca upstream of the plan area is open to residential development, which lies about 80 feet from the western edge of the barranca. This portion of the barranca lies within a linear bike path and walking trail and there is no fence prohibiting access to the barranca. Similar to what is proposed under the

specific plan, a split rail fence marks the bike path. Within the plan area, the barranca is currently unfenced. There is an existing residence onsite and adjacent residential development lies about 260 feet to the north of the barranca across Telegraph Road, or about 560 feet to the west adjacent the western boundary of the plan area. As the commenter notes, the proposed fence would not stop dogs and cats from entering the barranca. It is intended to discourage people from entering the barranca and is expected to serve the purpose.

The proposed project would introduce additional development, but the stream corridor is already located within a relatively developed urban area (see Figure 2-2 in Section 2.0, *Project Description,* for an aerial view). As discussed in the DEIR under impact BIO-3, no protected animal species were observed and the potential for occurrence is low to none. Nevertheless, because development under the specific plan has the potential to introduce noise, lighting, domestic animals, mitigation measures BIO-3(a-d) have been provided. Given the lack of protected species within the barranca, these measures are sufficient to reduce the potential for adverse effects to a less than significant level. Moreover, as indicated in the letter from the California Department of Fish and Game (DFG), the DFG concurs with the impacts and mitigation discussed in the DEIR.

<u>Response 2.3</u>

The commenter suggests that Alternative 1, no project, be adopted. The comment is noted. As the comment does not pertain to the adequacy of the DEIR, no further response is necessary.

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Legal Counsel
Anthony H. Trembley

General Manager
E. Michael Solomon

Letter 3

UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

January 14, 2009

Mr. Iain Holt
Community Development Department
City of San Buenaventura
501 Poli Street
Ventura, CA 93001

Reference: Parklands Specific Plan Draft EIR (November, 2008)

Dear Mr. Holt,

United Water Staff has reviewed the Parklands Specific Plan Draft Environmental Impact Report and have the following comments which are discussed below.

- The Water Supply Assessment (WSA), Appendix I, does not mention that the Santa Paula basin is under California Superior Court stipulated Judgment with respect to pumping. This means that pumpers within the basin are subject to a 7 year rolling average pumping allocation. The proposed development overlies the Gladys D. Coffman property. Gladys D. Hoffman was assigned a 97 acre-feet allocation based on the historical pumping of well 03N22W-35N01. The City of Ventura was assigned a pumping allocation of 3,000 acre-feet. We assume that the City of Ventura will be given the 97 acre-feet allocation that belongs to Gladys D. Coffman. This would give the City a total allocation of 3,097 acre-feet. 3.1

  The Judgment contains staged pumping allocation reductions in the event the pumping allocations are determined by the Court to be in excess of basin yield. The City of Ventura has a Stage 3 cutback from an allocation of 3,000 acre-feet to an allocation of 1,141 acre-feet (United Water Conservation District vs. City of San Buenaventura, 1996). The WSA does not account for the possibility of a Stage 3 Santa Paula basin pumping allocation reduction. 3.2

- The WSA relies on GMA credits which the WSA refers to as "Banked Groundwater", to allow for additional pumping needed in drought years. The accumulated GMA credits of 35,447 acre-feet stated by the WSA as available at the end of 2004 need to be updated to 28,821 acre-feet of credits available as of the end of 2007 (Dave Panaro FCGMA, 2008). 3.3

  The method shown in the WSA for the accrual of future GMA credits shown in Table 4, WSA page 6, and Table 6, WSA, page 8 appears incorrect. GMA credits can only be accrued if the City of Ventura annual pumping on the Oxnard Plain is less than the assigned pumping allocation of 4,378 acre-feet (this is 80% of original GMA pumping allocation of 5,472 acre-feet and does not include the Saticoy Country Club allocation). The water supply from Lake Casitas, the Ventura River, Mound basin, Santa Paula basin and the Saticoy County Yard 3.4

106 N. 8th Street • Santa Paula, California 93060 • Phone (805) 525-4431 • FAX (805) 525-2661 • www.unitedwater.org

well cannot be included in GMA credit calculations. Since the WSA projects dry year Oxnard Plain pumping to be 4,400 acre-feet there can be no accrual of GMA credits. This is 22 acre-feet above the GMA allocation.

Attached is a revised Table 6 (Summary of Projected Multiple-Dry Three Year Water Demand and Supply) with the correct GMA credit accumulation. This shows a cumulative deficit of 20,328 acre-feet of GMA credits by the year 2030 as opposed to the existing table which shows a cumulative deficit of 1,454 acre-feet by the year 2030.

WSA normal year projection of Oxnard Plain pumping at 4,600 acre-feet (Table 4) is 222 acre-feet above the GMA allocation. Thus there would be no accrual of GMA credits in normal years. 3.5

- Table 4, page 6 of the WSA shows multiple dry year reduction of pumping in City of Ventura Mound Basin wells and the Saticoy County Yard well. Are these downward pumping projections based on anticipated water quality and drawdown problems? 3.6
- UWCD is incorrectly stated as a water supplier to the City of Ventura on page 2 of the WSA. 3.7
- On page 12 of the WSA the Saticoy County Yard well is incorrectly stated to be located in the "United Forebay basin". This should be the Oxnard Forebay basin. 3.8
- A map of the City of Ventura distribution pipeline from all of its water supply sources would be beneficial. This would better help us understand the specific sources that will supply the Parkland development. We assume, however, the Parkland development will be supplied water from the Saticoy #2 well, Saticoy #3 well or the Saticoy County Yard well. 3.9

Thank you for allowing us to comment on the Parklands Specific Plan Draft Environmental Impact Report. If you have any questions please contact Pete Dal Pozzo at (805) 525-4431 or alternatively at peted@unitedwater.org .

Sincerely,

E. Michael Solomon

E. Michael Solomon
General Manager

Cc: BDRF
Santa Paula Basin Pumpers Association

File: City of San Buenaventura

Table 6. Revised from Parklands Specific Plan Water Supply Assessment
Summary of Projected Multiple-Dry Three Year Water Demand and Supply (Five Year Increments in Acre-Feet)

Year	Projected Planning Area Population (ac-ft)	Projected Water Demand (ac-ft)	Projected Supply Multiple-Dry Water Years (ac-ft)	Difference (Supply-Demand) (ac-ft)	GMA Allocation (ac-ft)	GMA (Oxnard Plain) Projected Pumping (ac-ft)	Additional GMA (Oxnard Plain) Pumping (ac-ft)	GMA Credits Accrual (ac-ft)	GMA Credits January 2008 (28,821) Stand Alone (ac-ft)	GMA Credits January 2008 (28,821) Cumulative (ac-ft)
2008	112,677	21,282	25,764	4,482	4,378	4,400	0	-22	28,799	28,799
2009	113,648	21,457	20,783	-674	4,378	4,400	674	-696	28,103	28,103
2010	114,629	21,633	16,549	-5,084	4,378	4,400	5,084	-5,106	22,997	22,997
2013	117,621	22,172	25,464	3,292	4,378	4,400	0	-22	28,799	22,975
2014	118,635	22,354	20,483	-1,871	4,378	4,400	1,871	-1,893	26,906	21,082
2015	119,659	22,539	16,549	-5,990	4,378	4,400	5,990	-6,012	20,894	15,070
2018	122,784	23,101	25,464	2,363	4,378	4,400	0	-22	28,799	15,048
2019	123,844	23,292	20,483	-2,809	4,378	4,400	2,809	-2,831	25,968	12,217
2020	124,913	23,484	16,549	-6,935	4,378	4,400	6,935	-6,957	19,011	5,260
2023	128,177	24,072	25,464	1,392	4,378	4,400	0	-22	28,799	5,238
2024	129,284	24,271	20,483	-3,788	4,378	4,400	3,788	-3,810	24,989	1,428
2025	130,400	24,472	16,549	-7,923	4,378	4,400	7,923	-7,945	17,044	-6,517
2028	133,755	25,076	25,464	388	4,378	4,400	0	-22	28,799	-6,539
2029	134,909	25,284	20,483	-4,801	4,378	4,400	4,801	-4,823	23,976	-11,362
2030	136,072	25,493	16,549	-8,944	4,378	4,400	8,944	-8,966	15,010	-20,328

Letter 3

COMMENTER: E. Michael Solomon, General Manager, United Water Conservation District

DATE: January 14, 2009

Response 3.1

The commenter states that the Water Supply Assessment (WSA), Appendix I, does not mention that the Santa Paula basin is under California Superior Court stipulated Judgment with respect to pumping and that pumpers within the basin are subject to a seven year rolling average pumping allocation. The commenter further states that the proposed development, which overlies the Gladys D. Coffman property, has been assigned a 97 acre-feet per year (AFY) allocation based on the historical pumping of well 03N22W-35N01 and that the City of Ventura has been assigned a pumping allocation of 3,000 AFY. The commenter assumes that the City will be given the Gladys D. Coffman allocation of 97 AFY.

If the project is approved, the plan area would be annexed to the City and would be provided water by the City via the City's existing water system. The subdivider shall dedicate all water rights on the property, including shares in mutual water companies, to the City on the Final Map, in order to assist in mitigating the water demand created by the project and to preclude inappropriate water use. Further, any wells on the site would be abandoned or destroyed in a manner satisfactory to the City Engineer and the County Resource Management Agency. Therefore, the current pumping allocation of 97 AFY (under the party name of Gladys D. Coffman) from the Santa Paula Basin would be transferred to the City as part of the conditions of development.

Response 3.2

The commenter states that the California Superior Court Judgment contains staged pumping allocation reductions in the event the pumping allocations are determined by the Court to be in excess of basin yield. The commenter further states that the WSA does not account for the possibility of a Stage 3 Santa Paula basin pumping allocation reduction.

The Water Supply Assessment conducted for the specific plan (see Appendix I) considers a generic future drought scenario, including both a single dry year and three consecutive dry years. The Water Supply Assessment was based on the information presented in the 2005 UWMP and 2006 Biennial Water Supply report. The commenter notes that the pumping reduction within the Santa Paula groundwater basin would be about 1,859 acre-feet/year under at Stage 3 pumping reduction. This is about 6% of the overall forecasted supply of 29,900 acre-feet/year as forecast in Table 1 of the Water Supply Assessment.

The City of Ventura may implement water shortage stages and reduction goals in the event that water resources are reduced. As Table 7 of the Water Supply Assessment in Appendix I indicates, a Stage 3 shortage corresponds to an overall demand reduction goal of 20% with mandatory conservation measures. Moreover, as indicated on page 9 of the Water Supply Assessment, no cumulative shortage is anticipated even with a three-year drought every five

years. Therefore, even if a Stage 3 pumping reduction were assessed on annual withdrawals from the Santa Paula Basin, overall demand could be offset with water shortage stages and reductions implemented by the City if necessary.

Response 3.3

The commenter states that the WSA relies on Groundwater Management Agency (GMA) credits which the WSA refers to as "Banked Groundwater," to allow for additional pumping needed in drought years. The commenter suggests that the accumulated GMA credits stated in the WSA be updated to reflect the 2007 statistic of 28,821 acre-feet of available credits, as indicated by Dave Panaro, Fox Canyon Groundwater Management Agency (FCGMA), 2008.

The commenter refers to only GMA groundwater credits, while the WSA and 2005 UWMP consider "Banked Groundwater" as surplus from all City supply sources. The amount of banked groundwater was obtained from the adopted 2005 UWMP, which assumes that 35,447 acre feet were available as banked groundwater from all City supply sources.

However, even if Table 6 of the WSA were updated to reflect the 6,626 acre-foot reduction (35,447-28,821) asserted by the Fox Canyon Groundwater Management Agency, standalone supplies would be adequate to serve the proposed development through 2030 with a 15,465 acre feet remaining in the groundwater bank (see Table 6 of the WSA in Appendix I). If the cumulative losses were assumed (one three-year long drought every five years until 2030), supplies would still be adequate to serve development through 2029, as was concluded on page 9 of the WSA. This analysis including the commenter's reduction, does not change the conclusions of the WSA, which is based on adopted estimates of banked groundwater from multiple sources as documented in the 2005 UWMP. Therefore, no changes to the tables in the WSA will be made.

Response 3.4

The commenter states an opinion that the method shown in the WSA for the accrual of future GMA credits in Table 6 appears incorrect. The commenter states that the water supply from Lake Casitas, the Ventura River, Mound basin, Santa Paula basin and the Saticoy County Yard well cannot be included in GMA credit calculations. The commenter asserts that no accrual of GMA credits would in fact occur. The commenter attached a revised Table 6 with altered GMA credit accumulation.

The banked groundwater credit calculations contained in the WSA are based on the City's methodology as contained in Table 6-1 and Table 6-4 of the adopted 2005 UWMP. As previously noted, the 2005 UWMP and the WSA both consider "banked groundwater" as surplus from all City supply sources, whereas the commenter considers only GMA credit as banked groundwater.

Response 3.5

The commenter states that the WSA normal year projection of Oxnard Plain pumping, shown in Table 4, is 222 acre-feet above the GMA allocation; thus, there would be no accrual of GMA credits during normal years, according to the commenter. The banked groundwater credit

calculations contained in the WSA are based on the City's methodology as contained in Table 6-1 and Table 6-4 of the adopted 2005 UWMP. Table 4 of the WSA reflects the City's capacity of current facilities with a full basin (from Table 3-6 of the 2005 UWMP). Table 4 shows GMA allocation available used to calculate the available treated water supply.

Response 3.6

The commenter states that Table 4 of the WSA shows multiple dry year reduction of pumping in the City Mound Basin wells and the Saticoy County Yard well. The commenter wonders if the reduction is due to anticipated water quality and drawdown problems. The forecast reductions are taken from Section 6.3 of the 2005 UWMP (page 46) and are based on *"1) the current status of each existing source and 2) the past response of each existing source to similar drought conditions."* Please refer to Table 4 footnote No. 6 for the Mound Basin information and Footnote No. 8 for the Saticoy County Yard Well.

Response 3.7

The commenter states that the UWCD is incorrectly identified as a water supplier to the City. The WSA has been updated to delete the reference to UWCD as a supplier on page 2 of the WSA.

Response 3.8

The commenter states that the Saticoy County Yard well is incorrectly stated to be located in the "United Forebay basin" in the WSA and should be amended to be located in the "Oxnard Forebay basin." The characterization of the location was made based on information contained in the adopted 2005 UWMP. Per the 2008 Biennial Water Supply Report, Page 5, the Saticoy County Yard well will pump from the Oxnard Forebay basin and is not within the GMA boundary. The WSA will be amended to include this language.

Response 3.9

The commenter states that a map of the City distribution pipeline from all of its water supply sources would be beneficial to help the commenter understand the specific sources that will supply the proposed project. The commenter assumes that the proposed project would be supplied water from the Saticoy #2 well, Saticoy #3 well, or the Saticoy County Yard well. The project would be served by the City, which derives water from numerous sources, as indicated on page 2 and 3 of the WSA. The plan area is located in the eastern portion of the City and would likely be served by groundwater supplied by the Santa Paula Basin (Saticoy #2 well and Saticoy #3 well) the Saticoy County Yard Well, and future sources.

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Legal Counsel
Anthony H. Trembley

General Manager
E. Michael Solomon

Letter 4

UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

November 20, 2008

Mr. Iain Holt
Community Development Department
City of San Buenaventura
501 Poli Street
Ventura, CA 93001

Reference: Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration (March, 2008)

Dear Mr. Holt,

United Water Staff has reviewed the Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration and have the following comments which are discussed below. We apologize for not getting you our comments before the October 28, 2008 scoping meeting on the Draft Focused Environmental Impact Report.

- The Water Supply Assessment (WSA) Appendix G does not mention that the Santa Paula basin is under California Superior Court stipulated Judgment with respect to pumping. This means that pumpers within the basin are subject to a 7 year rolling average pumping allocation. The proposed development overlies the Gladys D. Coffman property. Gladys D. Hoffman was assigned a 97 acre-feet allocation based on the historical pumping of well 03N22W-35N01. The City of Ventura was assigned a pumping allocation of 3,000 acre-feet. We assume that the City of Ventura will be given the 97 acre-feet allocation that belongs to Gladys D. Coffman. This would give the City a total allocation of 3,097 acre-feet 4.1

  The Judgment contains staged pumping allocation reductions in the event the pumping allocations are determined by the Court to be in excess of basin yield. The City of Ventura has a Stage 3 cutback from an allocation of 3,000 acre-feet to an allocation of 1,141 acre-feet (United Water Conservation District vs. City of San Buenaventura, 1996). The WSA does not account for the possibility of a Stage 3 Santa Paula basin pumping allocation reduction. 4.2

- The WSA relies on GMA credits which the WSA refers to as "Banked Groundwater", to allow for additional pumping needed in drought years. The accumulated GMA credits of 35,447 acre-feet stated by the WSA as available at 4.3

106 N. 8th Street • Santa Paula, California 93060 • Phone (805) 525-4431 • FAX (805) 525-2661 • www.unitedwater.org

the end of 2004 need to be updated to 28,821 acre-feet of credits available as of the end of 2007 (Dave Panaro FCGMA, 2008).

The method shown in the WSA for the accrual of future GMA credits shown in Table 4, WSA page 6, and Table 6, WSA, page 8 appears incorrect. GMA credits can only be accrued if the City of Ventura annual pumping on the Oxnard Plain is less than the assigned pumping allocation of 4,378 acre-feet (this is 80% of original GMA pumping allocation of 5,472 acre-feet and does not include the Saticoy Country Club allocation). The water supply from Lake Casitas, the Ventura River, Mound basin, Santa Paula basin and the Saticoy County Yard well cannot be included in GMA credit calculations. Since the WSA projects dry year Oxnard Plain pumping to be 4,400 acre-feet there can be no accrual of GMA credits. This is 22 acre-feet above the GMA allocation. WSA normal year projection of Oxnard Plain pumping at 4,600 acre-feet (Table 4) is 222 acre-feet above the GMA allocation. 4.4

Attached is a revised Table 6 (Summary of Projected Multiple-Dry Three Year Water Demand and Supply) with the correct GMA credit accumulation. This shows a cumulative deficit of 20,328 acre-feet of GMA credits by the year 2030 as opposed to the existing table which shows a cumulative deficit of 1,454 acre-feet by the year 2030.

- The existing Saticoy County yard well and the proposed Saticoy #3 well are assumed to be different wells. Section M-3, Utilities and Service Systems of the Draft Negative Declaration refers to the Saticoy #3 well as the Saticoy County Yard well. 4.5

- Table 4, page 6 of the WSA shows multiple dry year reduction of pumping in City of Ventura Mound Basin wells and the Saticoy County Yard well. Are these downward pumping projections based on anticipated water quality and drawdown problems? 4.6

- UWCD is incorrectly stated as a water supplier to the City of Ventura on page 2 of the WSA. 4.7

- On page 12 of the WSA the Saticoy County Yard well is incorrectly stated to be located in the "United Forebay basin". This should be the Oxnard Forebay basin. 4.8

UNITED WATER CONSERVATION DISTRICT

- A map of the City of Ventura distribution pipeline from all of its water supply sources would be beneficial. This would better help us understand the specific sources that will supply the Parkland development. We assume, however, the Parkland development will be supplied water from the Saticoy #2 well, Saticoy #3 well and the Saticoy County Yard well. 4.9

Thank you for allowing us to comment on the Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration. If you have any questions please contact Pete Dal Pozzo at (805) 525-4431 or alternatively at peted@unitedwater.org .

Sincerely,

E. Michael Solomon
General Manager

Cc: BDRF
Santa Paula Basin Pumpers Association

File: City of San Buenaventura
H:\pete\City of Ventura\Comments on Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration (March, 2008) 11-18-08

Table 6 Revised. Summary of Multiple-Dry Three Year Water Demand and Supply (Five Year Increments in Acre-feet).
Parklands Specific Plan Water Supply Assesment

Year	Projected Planning Area Population (ac-ft)	Projected Water Demand (ac-ft)	Projected Supply (ac-ft)	Difference (Suply-Demmand) (ac-ft)	GMA Allocation (ac-ft)	GMA Projected[1] Pumping (ac-ft)	GMA Credit Accrual (ac-ft)	GMA Credits January 2008 (28,821) stand alone (ac-ft)	GMA Credits January 2008 (28,821) cumulative (ac-ft)
2008	112,677	21,282	25,764	4,482	4,378	4,400	-22	28,799	28,799
2009	113,648	21,457	20,783	-674	4,378	4,400	-22	28,103	28,103
2010	114,629	21,633	16,549	-5,084	4,378	4,400	-22	22,997	22,997
2013	117,621	22,172	25,464	3,292	4,378	4,400	-22	28,799	22,975
2014	118,635	22,354	20,483	-1,871	4,378	4,400	-22	26,906	21,082
2015	119,659	22,539	16,549	-5,990	4,378	4,400	-22	20,894	15,070
2018	122,784	23,101	25,464	2,363	4,378	4,400	-22	28,799	15,048
2019	123,844	23,292	20,483	-2,809	4,378	4,400	-22	25,968	12,217
2020	124,913	23,484	16,549	-6,935	4,378	4,400	-22	19,011	5,260
2023	128,177	24,072	25,464	1,392	4,378	4,400	-22	28,799	5,238
2024	129,284	24,271	20,483	-3,788	4,378	4,400	-22	24,989	1,428
2025	130,400	24,472	16,549	-7,923	4,378	4,400	-22	17,044	-6,517
2028	133,755	25,076	25,464	388	4,378	4,400	-22	28,799	-6,539
2029	134,909	25,284	20,483	-4,801	4,378	4,400	-22	23,976	-11,362
2030	136,072	25,493	16,549	-8,944	4,378	4,400	-22	15,010	-20,328

[1] **Does not include projected 4,600 acre-feet normal year Oxnard Plain GMA pumping**

Letter 4

COMMENTER: E. Michael Solomon, General Manager, United Water Conservation District

DATE: November 20, 2008

Response 4.1

Please see Response 3.1.

Response 4.2

Please see Response 3.2.

Response 4.3

Please see Response 3.3.

Response 4.4

Please see Response 3.4.

Response 3.5

The commenter states that the Initial Study in Appendix A of the DEIR inaccurately identifies the Saticoy County yard well and Saticoy #3 well as the same well. The wells are acknowledged to be two separate wells. The following sentence located under topic M.3 in the initial study (Appendix A) will be modified as follows. Deleted text is shown in strikethrough. *As discussed above under L.1, current pressure deficiencies in the Wells and Saticoy areas are being addressed through City planned improvements and additional water supply in the Saticoy area would be provided for planned growth under the 2005 General Plan through development of Saticoy Well #3 ~~(also called the Saticoy Yard Well, planned for operation in late 2009)~~.*

Response 4.6

Please see Response 3.6.

Response 4.7

Please see Response 3.7.

Response 4.8

Please see Response 3.8.

Response 4.9

Please see Response 3.9.

Letter 5

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division
Kimberly L. Rodriguez
Director

January 16, 2009

City of San Buenaventura
Planning Division
501 Poli Street
Ventura, CA 93002
Attn.: Mr. Iain Holt

E-mail: iholt@ci.ventura.ca.us

Subject: Comments on NOC/DEIR; Parklands Specific Plan/General Plan Amendment/Tract Map

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Kari Finley, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009. 5.1

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Kari Finley at (805) 654-3327.

Sincerely,

Kimberly L. Rodriguez
County Planning Director

Attachment

County RMA Reference Number 08-010-2

800 South Victoria Avenue, L# 1740, Ventura, CA 93009-1740 (805) 654-2481 Fax (805) 654-2509

Letter 5

COMMENTER: Kimberly L. Rodriguez, County Planning Director, County of Ventura Resource Management Agency

DATE: January 16, 2009

Response 5.1

The commenter states that comments that have been received by the County of Ventura Resource Management Agency have been attached and that additional comments may have been sent directly to the City of Ventura. The commenter further states that responses to comments should be sent to the commenter with a copy to Kari Finley, Ventura County Planning Division. No further response is necessary.

Letter 6

COUNTY OF VENTURA
PUBLIC WORKS AGENCY

ENGINEERING SERVICES DEPARTMENT
DEVELOPMENT & INSPECTION SERVICES DIVISION

MEMORANDUM

DATE: January 14, 2009

TO: Kari Finley, Case Planner
RMA - Planning Division

FROM: Jim Myers
Engineering Manager II
Development and Inspection Services

SUBJECT: APPLICATION COMPLETENESS
PROJECT NO.: 08-010-2
LEAD AGENCY: City of Ventura Parklands Specific Plan / General Plan Amendment / Tract Map

Development & Inspection Services has reviewed the Draft EIR for the proposed development. The DEIR should address Geologic and soil engineering hazards including liquefaction. 6.1

Letter 6

COMMENTER: Jim Myers, Engineering Manager II, County of Ventura Public Works Agency

DATE: January 14, 2009

Response 6.1

The commenter states an opinion that the DEIR should address geologic and soil engineering hazards, including liquefaction.

Liquefaction potential for the plan area was analyzed in the Initial Study for the Parklands Specific Plan and, with implementation of standard conditions, was found to be a less than significant impact. The following language from the Initial Study specifically addresses this issue.

> *A standard project condition requires the preparation of a soils and geology investigation by a qualified expert to identify any site preparation or engineering design recommendations for site development that further ensure potential adverse effects from liquefaction hazards are less than significant. A report has been prepared for this project, which will be reviewed by the City Building Official/Fire Marshal. The recommendations of this report would establish required compliance measures. The building official may require that special provisions be made in foundation design and construction for the high-risk structures. Implementation of this standard development project condition would reduce risk due to liquefaction to a less than significant level and no mitigation measures are required.*

The DEIR considers issues that were raised as potentially significant when a Mitigated Negative Declaration (MND) was previously circulated for the Parklands Specific Plan. As the Initial Study did not identify potentially significant geologic impacts and no comments on the MND raised concerns about that issue, it was determined that further discussion of the issue of geology in the DEIR was not warranted.

Letter 7

Ventura
Local Agency Formation Commission

January 14, 2009

Mr. Iain Holt
City of San Buenaventura
Planning Division
501 Poli Street
Ventura, CA 93002

RE: Parklands Specific Plan Draft EIR

Dear Mr. Holt:

Thank you for providing the Ventura Local Agency Formation Commission (LAFCO) with the opportunity to review the Draft EIR for the Parklands Specific Plan. As a CEQA responsible agency, we are charged with ensuring that environmental documents prepared by lead agencies address the issues that relate to our scope of authority. Please note that these comments are solely those of the LAFCO staff; the document has not been reviewed by the Commission.

Impact LU-2, Page 4.7-11

Agricultural and Open Space Preservation.

The DEIR identifies various LAFCO policies concerning its role in the preservation of agriculture resources. According to the DEIR, as part of the adoption of the 2005 general plan, the City Council adopted a statement of overriding considerations for the unavoidable significant impact of converting prime farmland. Please note that the City's adoption of a statement of overriding consideration does not absolve LAFCO of its responsibility to evaluate a project's impact on agricultural resources.

Also, in reviewing the City Council's Resolution which certified the general plan's FEIR (Resolution 2005-071), it was noted that the significant unavoidable impact of converting prime farmland is not among the impacts for which statements of overriding considerations where adopted. 7.1

Please note Ventura LAFCO Commissioner's Handbook Policy 2.1.2. requires the submittal of specific information in conjunction with change of organization proposals that could lead to the conversion of agricultural lands to non-agricultural uses (the Handbook can be found on LAFCO's website:

County Government Center • Hall of Administration • 800 S. Victoria Avenue • Ventura, CA 93009-1850
Tel (805) 654-2576 • Fax (805) 477-7101
http://www.ventura.lafco.ca.gov

www.ventura.lafco.ca.gov/html/publications.htm). Any of this information not included in the EIR will be required by LAFCO prior to deeming an application complete.

School Capacity

The DEIR seems to imply that LAFCO Handbook Policy 3.1.6 does not apply to this project, citing sections of the government code that restrict LAFCO from imposing mitigation measures or conditions to address impacts to schools. Please note that Policy 3.1.6 does not provide for the imposition of mitigation or conditions regarding school capacity. It simply states that a reorganization will not be favored if the school district certifies that it does have sufficient school capacity. The cited code sections are not relevant and do not in any way supersede LAFCO's authority to approve or disapprove a change of organization. 7.2

Island Annexation

We would like to remind the City that the proposed annexation appears to meet the criteria outlined in Handbook Policy 3.2.3 regarding the annexation of unincorporated county islands (Montalvo). As a result, recordation of the Parklands annexation may be contingent on the City's annexation of its unincorporated island. 7.3

Please do not hesitate to contact me should you have any questions.

Sincerely,

Kai Luoma, AICP
Deputy Executive Officer

cc: Supervisor Steve Bennett, District 1

Letter 7

COMMENTER: Kai Luoma, Deputy Executive Officer, Ventura Local Agency Formation Commission (LAFCO)

DATE: January 14, 2009

Response 7.1

The commenter states that the City's adoption of a statement of overriding consideration for the unavoidably significant impact of converting prime farmland does not absolve LAFCO of its responsibility to evaluate a project's impact on agricultural resources. The commenter states that the submittal of specific information in conjunction with change of organization proposals that could lead to the conversion of agricultural lands to non-agricultural uses is required by LAFCO prior to deeming an application complete. The commenter also notes that the statement of overriding considerations adopted by the City for the 2005 General Plan does not specifically identify agricultural resource impacts.

The comment regarding LAFCO responsibilities is noted and the City of Ventura will be required to provide specific information to LAFCO prior to completion of an application. This comment does not, however, pertain to the adequacy of the DEIR.

The commenter is correct that the issue of agricultural resources was inadvertently left off of the statement of overriding considerations (SOC) originally adopted for the 2005 General Plan on August 8, 2005. However, the FEIR for the 2005 General Plan specifically identifies unavoidably significant agricultural resource impacts associated with the 2005 General Plan, which considered development of the specific plan area. In addition, the omission of the agricultural resources impact was subsequently discovered and the City subsequently readopted the SOC, with the acknowledgement of the unavoidably significant agricultural resource impact, on two separate occasions. First, the SOC was subsequently adopted in association with the Housing Approval Program on August 7th, 2006. The SOC was then adopted again in conjunction with the 2005 General Plan SEIR that evaluated additional development within the Ventura Harbor area on July 9th, 2007.

Please note that the Parklands Specific Plan DEIR tiers off of the 2005 General Plan EIR, which is incorporated by reference. A note clarifying that point has been added to Section 1.0 of the FEIR.

Response 7.2

The commenter states an opinion that the DEIR seems to imply that LAFCO Handbook Policy 3.1.6 does not apply to the Parklands Specific Plan. The commenter notes that Policy 3.1.6 does not provide for the imposition of mitigation or conditions regarding school capacity, but rather states that a reorganization will not be favored if the school district certifies that it does not have sufficient school capacity. The DEIR includes this discussion on Page 4.7-13 of Section 4.7, *Land Use*, regarding school capacity.

> *School Capacity. LAFCo will not favor a change of organization where any affected school district certifies that there is no sufficient existing school capacity to serve the territory involved. As discussed in the Initial Study (Appendix A), although many schools are at or near capacity, the school district is working toward resolving overcrowding through construction of a new middle school in the vicinity of the plan area, as well as exploring potential new school sites and expansion of facilities at existing sites. Mitigation of adverse effects on capacity at schools is accomplished through payment of School Mitigation Fees at issuance of building permits pursuant to State Law. Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, mitigation is not required and the impact is considered less than significant.*

The DEIR does not suggest that LAFCO policies do not apply to the proposed specific plan. However, the question of whether or not the LAFCO will favor the proposed reorganization is not a CEQA issue, but one that the LAFCO will need to consider at the time the City applies to the LAFCO for a reorganization.

Response 7.3

The commenter states that the proposed annexation appears to meet the criteria outlined in Handbook Policy 3.2.3 regarding the annexation of unincorporated county islands (Montalvo). The commenter further states that, as a result, recordation of the Parklands annexation may be contingent on the City's annexation of its unincorporated island. The DEIR discusses Policy 3.2.3 and notes its applicability on page 4.7-13.

Letter 8

PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division
M E M O R A N D U M

DATE: December 19, 2008

TO: Resource Management Agency, Planning Division
Attention: Kari Finley

FROM: Nazir Lalani, Deputy Director

SUBJECT: **REVIEW OF DOCUMENT 08-010-2 Westwood Communities Corporation**
Notice of Completion for Draft Environmental Impact Report.
Project consists of an Annexation, Specific Plan, Zone Change, and General Plan Amendment located in southwest corner of Telegraph Road and Wells Road in the City of Ventura.
Lead Agency: **City of Ventura**
APN 089-0-012-045, -080, -140,-016, -160, -185. -195, -200 & -210

Pursuant to your request, the Public Works Agency -- Transportation Department has completed the review of the Draft EIR for Annexation, General Plan (GP) Amendment, Specific Plan (SP), Zone Change, Tentative Tract map, and Design Review for the subject project. The proposed project consists of an Annexation, SP, and Zone Change from County Single Family (R-1) and City Single Family (R-1 =-1AC) to form-based code transect zones T3.1, T3.1 and T4.6 and associated overlays zones and a subdivision of a 66.7-acre site for 216 single-family residential dwellings, 283 courtyard and town home condominiums, 25,000 sq.ft. of commercial, 6,560 sq.ft. of community building and approximately 11.62 acres of open space and park area. Accompanying the project is a GP Amendment changing Figure 3.5 for SP designation and Figure 4.3 Roadway Classification Plan of the 2005 GP for the segment of Wells Road between Telegraph Road and Carlos Street to be constructed as a collector with two travel lanes in the short term, while retaining the right-of-way width in the future for the secondary arterial with four travel lanes.

Our comments are as follows:

1. No project specific impacts on County roadways were identified in the Draft EIR, as identified in our memo dated July 23, 2008. Project specific impacts on County roadways need to be addressed in the Draft EIR. 8.1

2. As identified in the July 23, 2008 memo, the Draft EIR should include the project site specific impacts, if any, and mitigation measures to address additional traffic from this project on Ventura County local roads and intersections, in particular, on the following road segments and intersections: 8.2

   - Foothill Road, from City of Ventura city limits to Olive Road, including the intersection;
   - Intersection of Foothill Road and Wells Road;

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- Telegraph Road, from Ventura city limits to Olive Road, including the intersection;
- Olive Road, from Foothill Road to Telegraph Road;
- Saticoy Avenue, from and to City of Ventura city limits;
- Intersection of SR 118 and Nardo Street;
- Intersection of SR 118 and Vineyard Avenue (SR 232);
- Intersection of SR 118 and Rose Avenue;
- Intersection of SR 118 and Santa Clara Avenue, and
- Intersection of SR 118 and Hwy 34.

8.3

The project shall contribute its fair share of cost for the sidewalk improvement project on Foothill Road in the vicinity of Brown Baranca, which is to be a joint project between the City of Ventura and the County of Ventura. 8.4

Additionally:

4. The cumulative impact of this project, when considered with the cumulative impact of all other approved (or anticipated) development projects in the County, is potentially significant. The condition for paying the County Traffic Impact Mitigation Fee (TIMF) to address the cumulative impacts of this project on the County Regional Road Network should be included in the Draft EIR. Based on the information from Initial Study (reviewed April 16, 2008) and the Reciprocal Agreement between the City of Ventura and the County of Ventura, the fee due to the County is: 8.5

   5,559 ADT x $42.95/ADT = **$238,759.05**

   The above estimated fee may be subject to adjustment at the time of deposit, due to provisions in the TIMF Ordinance allowing the fee to be adjusted for inflation based on the Engineering News Record Construction Cost Index. The above fee is an estimate only based on information provided in the Initial Study. If the project cumulative impacts are not mitigated by payment of a TIMF, current GP policy will require County opposition to this project.

5. The Public Works Agency – Transportation Departments requests the opportunity to review the Draft Environmental Impact Report (DEIR) when it becomes available 8.6

Our review is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at 654-2080 if you have questions.

Letter 8

COMMENTER: Nazir Lalani, Deputy Director, County of Ventura Public Works Agency, Transportation Department

DATE: December 19, 2008

Response 8.1

The commenter suggests that project specific impacts on County roadways be addressed in the EIR. The traffic analysis included in the DEIR evaluates the traffic impacts of the Parklands Specific Plan based on the traffic impact thresholds adopted by the City of Ventura, the lead agency. The DEIR determined that the project-generated traffic would not result in project-specific or cumulative impacts to City or County roadways and intersections.

Response 8.2

The commenter states an opinion that the EIR should include the project site specific impacts, if any, and mitigation measures to address additional traffic from the project on Ventura County local roads and intersections, specifically mentioning 10 segments/intersections.

The DEIR evaluates 18 intersections in the study area adjacent to the plan area. The intersections included in the DEIR were determined based on consultation with the City of Ventura, the lead agency, review of the City's traffic impact criteria thresholds, and consideration of the likely travel routes for traffic generated by the project. The DEIR includes an evaluation of following three intersections that were listed in the County's comment letter.

- *Foothill Road/Wells Road*
- *State Route 118/Nardo Street*
- *State Route 118/Vineyard Avenue*

The DEIR analysis found that the project would not generate project-specific or cumulative impacts to these County intersections. Given the project-generated peak hour traffic volumes and the distribution of project traffic to the County intersections (some of which are located more the 10 miles away), the project would not generate impacts at the intersections of State Route 118/Rose Avenue, State Route 118/Santa Clara Avenue and State Route 118/State Route 34, Telegraph Road/Olive Road, and Foothill Road/Olive Road based on the City's impact criteria. The addition of project traffic would not cause the existing LOS on any County intersection to fall to an unacceptable level as defined by the County.

The roadway segments of Foothill Road, Telegraph Road, Olive Road and Saticoy Avenue currently operate at acceptable LOS under County and City standards. The project would add an estimated 8 peak hour trips to Foothill Road west of Wells Road, 13 peak hour trips to Telegraph Road east of Wells Road, 24 peak hour trips to Saticoy Road south of Telegraph Road and less than peak hour trips to Olive Road. The addition of project traffic would not cause the existing LOS on any County roadway segment to fall to an unacceptable level as defined by the County.

Response 8.3

The commenter states an opinion that the applicant should contribute fees to the cost of the sidewalk improvement on Foothill Road in the vicinity of Brown Barranca, which is to be a joint project between the City of Ventura and the County of Ventura. Given the location of the Parklands Specific Plan and the minimal amount of traffic added by the project to the segment of Foothill Road in the vicinity of the Brown Baranca, the City of Ventura has determined that project would not be responsible for contributing a fair share payment to the cost of the sidewalk improvement project due to a lack of a reasonable nexus.

Response 8.4

The commenter states an opinion that the cumulative impact of the project is potentially significant. The commenter suggests that payment of the County Traffic Impact Mitigation Fee (TIMF), estimated to be $238,759.05 based on the information in the Initial Study, be included in the EIR. The commenter further states that if project cumulative impacts are not mitigated by payment of a TIMF, current General Plan policy will require County opposition of the project. As required by the City's reciprocal fee agreement with the County, the applicant would be required to pay the County TIMF if the project is approved.

Response 8.5

The commenter requests the opportunity to review the DEIR when it becomes available. The County has already reviewed and commented on the DEIR, which was circulated for 45 days in accordance with the public review requirements outlined in sections 15203-15205 of the *CEQA Guidelines*. The FEIR will be available for review on the City of Ventura website prior to EIR certification hearings.

Letter 9

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Kari Finley/Dawnyelle Addison, Planning DATE: January 8, 2009

FROM: Alicia Stratton

SUBJECT: Request for Review of Request for Review of Draft Environmental Impact Report for the Parklands Specific Plan/General Plan Amendment/Tract Map, City of Ventura (Reference No. 08-010-2)

Air Pollution Control District staff has reviewed the subject draft environmental impact report (DEIR) which is a proposal for development of a 66.7-acre eight-parcel area in the Wells Community, with annexation of three parcels. The project would involve a general plan amendment and subsequent development would include residential uses, green-space, community recreational space and some service commercial development. There would be 216 single-family residential dwellings, 283 courtyard and town home condominiums, 6,560 sq. ft. of community building, 25,000 sq. ft. commercial/retail space and 11.62 acres of open space and park area. The project location is the southwest corner of the intersection of Telegraph Road and Wells Road in the City and County of Ventura. 9.1

Section 4.2 of the DEIR addresses air quality issues. We concur with the findings of this discussion that significant operational air quality impacts would result from the project. With implementation of Mitigation Measure No. Impact AQ-2, as described on Page 4.2-10 (Transportation Demand Management fees), air quality impacts would be reduced to a less than significant level. No further mitigation is needed.

If you have any questions, please call me at (805) 645-1426.

Letter 9

COMMENTER: Alicia Stratton, Ventura County Air Pollution Control District

DATE: January 8, 2009

Response 9.1

The commenter concurs with the findings regarding air quality impacts in DEIR Section 4.2, *Air Quality*. The commenter further concurs that impact AQ-2, as described on Page 4.2-10, would mitigate air quality impacts to a less than significant level and that no further mitigation is necessary. The comment is noted.

Letter 10

Neighbors Together

Parklands
Environmental Impact Report
EIR-2459
Review Comments

Daniel Cormode
East Ventura Community Council
Planning & Development Committee
04 Jan 2009

EVCC
EAST VENTURA COMMUNITY COUNCIL

Working Towards The Future

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Chapter 00
Parklands EIR-2459 Review Comments
Summary

1) This report contains comments developed by the East Ventura Community Council Planning & Development Committee as a result of a review of Draft Environmental Impact Report EIR-2459 for Annexation A327, General Plan Amendment AO-227, Specific Plan SP-6, Zone Change Z-916, Tentative Tract Map S-5632, Design Review ARB-2985 and EIR-2459 to be developed at the southwest corner of Telegraph Road and Wells Road, City and County of Ventura, Project Applicant Westwood Communities Corporation, 263 Westwood Blvd, #120, Los Angeles, CA 90024
2) Each of the comment subject area is contained in a separate chapter with each comment or data supporting the comment contained on a separate numbered slide within the chapter containing a graphic of the comment or supporting data and supporting text if the graphic is not self-explanatory. It is expected that the response from the preparer of the EIR will be pertinent to the subject, clear and unambiguous.
3) The following review comments are applicable to Chapters 1-19.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3. See Chapters 1-19 for additional details and supporting information.
   b) The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. . For additional information and a detailed discussion of the information supporting this comment, see Chapters 1-19.
   c) The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environmental effects.[1] . For additional information and a detailed discussion of the information supporting this comment, see Chapters 1-19. 10.1
   d) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative impact of proposed residential developments on each specific subject area of concern. . For additional information and a detailed discussion of the information supporting this comment, see Chapters 1-19.
4) The following comments are specifically applicable to Chapter 01 Parklands EIR-2459 Review Comments - Parklands EIR Requirements. For additional information and a detailed discussion of the information supporting this comment, see Chapter 2.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not address the impact of the downturn in the national and state economy and the resulting loss of revenues to the City of San Buenaventura which raises the issue of the City having sufficient revenues to meet expenses and make the residential development economically self-sustaining without to make additional subsidization from the general fund. Failure to adequately address this issue has the potential of not only creating an economic impact on the City, but a social impact on the general population created by the increased burden of paying additional taxes and fees to subsidize the impacts of residential development.
   c) The EIR fails to place the whole record before the reviewing bodies in order that the magnitude of substantial evidence can be determined.
   d) Information in other chapters contained in this report demonstrates and supports the contention that:
      i) Scientific and technical information is incomplete as demonstrated by previously submitted DMND and Scoping Meeting Reports have been omitted, drainage study data and maps previously contained in the DMND have been omitted and previously submitted archaeological and cultural data have been omitted:

[1] See Chapters 1-19 for additional specific detail.

ii) Views held by members of the public have been either withheld or omitted as demonstrated by eliminating comments to the DMND and Scoping Meeting; and

iii) Reasonably foreseeable impacts are not addressed as evidenced by failure to address the magnitude of the impact of a greater than Q100 storm event, failure to identify the adverse impact of reclassifying Telegraph and Wells Roads from secondary arterial to collector roadways violation of the California Fire Code requirements, and the social and economic impact of overcrowded schools.

e) The 2005 General Plan EIR is incomplete and fails to quantify impacts and therefore cannot be cited in subsequent Initial Studies (IS), Negative Declarations (ND) or Environmental Impact Reports (EIRs).

5) The following comments are specifically applicable to Chapter 02 Parklands EIR-2459 Review Comments - Cumulative Impacts. For additional information and a detailed discussion of the information supporting this comment, see Chapter 2.

a) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative impacts of proposed residential developments on the subject area of concern.

b) The EIR fails to provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects. The discussion fails to focus on whether the impacts of the project would result in cumulative effects,

c) The EIR does not address the cumulative physical, economic or social impacts of other residential development.

d) The *CEQA Guidelines* require that an EIR provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects 10.1

e) The EIR does not address the cumulative physical, economic or social impacts of other residential development on the ability to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32.

6) The following comments are specifically applicable to Chapter 03 Parklands EIR-2459 Review Comments - Other Comments. For additional information and a detailed discussion of the information supporting this comment, see Chapter 3.

a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

i) Responses to EIR-2459 Notice of Preparation prepared and submitted by the East Ventura Community Council were not either acknowledged or included in Appendix A of EIR-2459 Initial Study Notice of Preparation Responses to Notice of Preparation.

ii) Responses to the request for input for the EIR-2459 Scoping Meeting prepared and submitted by the East Ventura Community Council were not included in Appendix A of EIR-2459 Initial Study Notice of Preparation Responses to Notice of Preparation.

iii) Detailed issues and concerns submitted in writing by the East Ventura Community Council have not been specifically addressed as demonstrated by staff responses contained in the EIR. The East Ventura Community Council representative stated that all detailed issues and concerns provided in the letter and accompanying Compact Disk were expected to be specifically addressed in the EIR.

iv) The quantity, magnitude and omission of review comments provided by the East Ventura Community Council sufficiently demonstrate that EIR-2459 is inadequate and incomplete and that there has not been a good faith effort at full disclosure and, therefore, fails to meet the CEQA Guidelines for a standard of adequacy.

b) The City of San Buenaventura has failed to respond to requests for public information pertinent to the review of the subject EIR and, as a result in failing to respond to the above request, has violated the California Public Records Act.

7) The following comments are specifically applicable to Chapter 04 Parklands EIR-2459 Review Comments - Housing & Population. For additional information and a detailed discussion of the information supporting this comment, see Chapter 4.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR fails to recognize overcrowding of public facilities and the adverse effect of that overcrowding on the people.
   c) The 2005 General Plan EIR is incomplete and fails to quantify impacts and therefore cannot be cited in subsequent Initial Studies (IS), Negative Declarations (ND) or Environmental Impact Reports (EIRs).
8) The following comments are specifically applicable to Chapter 05 Parklands EIR-2459 Review Comments – Schools. For additional information and a detailed discussion of the information supporting this comment, see Chapter 5.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) Even though payment of fees is considered mitigation of environmental impacts, that does not excuse failure to discuss project specific and cumulative environmental, economic or social impacts. 10.1
   c) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development nor of the cumulative impact of proposed residential developments on schools.
      (1) Developers contribute to **64.8%** of the cost of new schools by paying developer fees with the balance funded by the school district.
      (2) The total seat cost for 6,961 units of a 2,500 square foot dwelling unit residential development is estimated to be $57,428,250 with only $37,241,350 collected in developer fees leaving the school district and taxpayer to pay **$20,186,900.**
      (3) The development of 6,961dwelling units will cause the student load at Saticoy School to exceed the maximum utilization by over 92% and Lincoln School to exceed the maximum utilization by over 69%.
      (4) The development of 6,961dwelling units will cause the student load at Anacapa and Balboa Middle Schools to exceed the maximum utilization. The development of 6,961 dwelling units will cause the student load at Buena High School to exceed the maximum utilization by over 8% and Ventura High School by 2%.
      (5) The School Site Selection was incomplete and was not consistent with the California Department of Education Site Selection Criteria.
9) Chapter 06 Parklands EIR-2459 Review Comments - Water Supply & Drought. For additional information and a detailed discussion of the information supporting this comment, see Chapter 6.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

b) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.
   (1) The City of San Buenaventura 2005 General Plan Environmental Impact Report (EIR) fails to address the susceptibility of the water supply to drought conditions.
   (2) The EIR fails to comply with CEQA and Supreme Court principles for conducting water supply analysis. Sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need over a long term and under conditions of drought are not presented.
   (3) Drought intensity, duration or safe/expected yields of rivers, lakes and aquifers under drought conditions are not discussed or quantified.
   (4) The environmental impacts to rivers, lakes and aquifers of providing water to the entire project under drought conditions is not discussed or quantified.
   (5) The EIR does not address the impacts of likely loss of future water sources does not include a reasoned analysis of the circumstances affecting the likelihood of the water's availability such as a prolonged drought.
   (6) Discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies under drought conditions are not discussed or quantified.
   (7) No degree of confidence is demonstrated of the ability of the current water supply to meet future requirements.

10) The following comments are specifically applicable to Chapter 07 Parklands EIR-2459 Review Comments – Traffic. For additional information and a detailed discussion of the information supporting this comment, see Chapter 7.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3. 10.1
   b) The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative.
   c) The EIR does not address the estimated cost to the City of $526,106.57 to delay paving and installing gutters on the unimproved right-of-way at a later date.
   d) The EIR does not address the City Council action taken on 06 Oct 2008 denying the proposed reclassification of Telegraph Road from a Secondary Arterial Roadway to a Collector Roadway.
   e) The EIR does not address impacts impact on 2005 General Plan due to intensification of land use beyond 2005 General Plan housing densities.
   f) The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative on surrounding neighborhood streets.
   g) The EIR does not addresses the cumulative effect of residential development on Wells Road Traffic.
   h) The EIR fails to discuss the errors in traffic planning resulting from using urban trip generation rates for different type of housing in a suburban environment.
   i) The EIR does not address the adverse physical, economic or social impacts of increased traffic or required infrastructure improvements from either the specific residential development or the cumulative impact of residential development.
   j) The EIR does not address the increase in traffic and subsequent adverse impact on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32

11) The following comments are specifically applicable to Chapter 08 Parklands EIR-2459 Review Comments - Viewshed Protection. For additional information and a detailed discussion of the information supporting this comment, see Chapter 8.
    a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
    b) Description of the visual impact of the soundwall on views of the hills and mountains contained in the EIR is incomplete.
    c) Description of the visual impact of the proposed development on views from Telegraph Road is incomplete.
    d) The EIR does not identify the visual impact of placing a soundwall on Blackburn Road.
    e) The EIR does not address the cumulative effect of freeway soundwalls from Franklin Barranca to Saticoy Avenue on the viewshed.
    f) The visual impact of the proposed residential development on views looking north from Wells Road are not adequately described.
    g) The EIR does not describe the visual impact of high rise buildings along Telegraph or Wells Roads.
12) The following comments are specifically applicable to Chapter 09 Parklands EIR-2459 Review Comments - Public Safety - Fire Department. For additional information and a detailed discussion of the information supporting this comment, see Chapter 9.
    a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
    b) Design Guidelines Typical 30 foot Wide Neighborhood Yield Street allows a maximum of 14.0 feet when parking is allowed on both sides of the streetwhich is in violation of the 2007 California Fire Code Minimum Street Width Street clearance of 20 feet when parking is allowed on both sides of the street. 10.1
    c) A minimum street width of 36 feet is required in order to comply with the 2007 California Fire Code Minimum Street Width Street clearance of 20 feet when parking is allowed on both sides of the street.
    d) Interference from opposing traffic which may prevent or delay Fire Apparatus from reaching destination is not addressed in the EIR.
    e) The inability of emergency vehicles to pass each other thereby creating operational problems for medical emergencies is not addressed.
    f) Curved streets having no line of sight between intersections and preventing emergency apparatus from observing oncoming vehicles is not addressed.
    g) Increase in emergency response time is not addressed in the EIR.
    h) Proposed modifications to resolve practical difficulties in the California Fire Code have not been justified.
    i) Hazards to emergency personnel created by Parkway Swale Hazards are not addressed.
    j) Additional response time created by implementing staging areas decreases chance of survival in of full cardiac arrest incidents.
    k) Project design elements which are not conducive to fire and rescue activities have not been addressed in the EIR.
    l) Mitigation measures are not proposed for 95% of the fire department incidents in the EIR.
13) The following comments are specifically applicable to Chapter 10 Parklands EIR-2459 Review Comments - Architectural & Cultural. For additional information and a detailed discussion of the information supporting this comment, see Chapter 10.
    a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
    b) Architectural and Cultural research was incomplete and limited.

c) Search of Internet Web Sites revealed additional archaeological or cultural information.

14) The following comments are specifically applicable to Chapter 11 Parklands EIR-2459 Review Comments – Drainage. For additional information and a detailed discussion of the information supporting this comment, see Chapter 11.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) While increased flows due to residential development for Q100 and below storms are mitigated, the EIR does not identify or quantify the adverse impact of storms with intensities greater than Q100.
   c) The magnitude or impact of the overflow from the Brown Barranca flowing easterly in the Hwy 126 Freeway culvert to the inlet of the Saticoy Drain and southerly over the Hwy 126 Freeway toward Darling Road and the Saticoy Drain is not discussed.
   d) The Brown Barranca Floodplain investigation only analyzed the condition of Brown Barranca overtopping Wells Road north of Blackburn and did not include analysis of flow eastward from under the Wells Road Overcrossing
   e) The latest revision of the FEMA Flood Insurance Rate Map is not referenced in the Parklands Brown Barranca Hydraulic Study
   f) The proposed Brown Barranca project is to only upgrade the existing inadequate earth ditch. And upgrades to resolve other infrastructure issues to not appear to be either included in the proposed project or funded.
   g) The EIR contains no studies or data to validate either the requirements or impact of the proposed storm water detention and other runoff reduction measures.
   h) The relatively small difference between the inflow at Telegraph Road and and outflow at Hwy 126 brings into question that inflows from all reaches have been properly accounted. No flow vs time data is included in the EIR. 10.1

15) The following comments are specifically applicable to Chapter 12 Parklands EIR-2459 Review Comments - Hazards & Soils. For additional information and a detailed discussion of the information supporting this comment, see Chapter 12.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) Investigation as to the extent and magnitude of an asbestos hazard is based on one remote finding and the supposition of past unrelated historical practices and is incomplete.
   c) Reports and maps of liquefaction areas are not shown.
   d) The EIR does not address different soil types and characteristics which were reported in the site.
   e) Physical inspection of the Brown Barranca has revealed the actual slope of the stream bank is inconsistent with the slope shown on the topographic maps.

16) The following comments are specifically applicable to Chapter 13 Parklands EIR-2459 Review Comments – Parking. For additional information and a detailed discussion of the information supporting this comment, see Chapter 13.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.
   c) The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.
   d) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of either the impact of the proposed residential development or the cumulative impact of the proposed residential development on the subject area of concern.

e) The above statements are substantiated by information contained in the attached slides.

17) The following comments are specifically applicable to Chapter 14 Parklands EIR-2459 Review Comments - Public Transportation – Bus. For additional information and a detailed discussion of the information supporting this comment, see Chapter 14.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not address the physical, economic or social impacts of the increased demand for public bus service created by either the specific residential development or the cumulative impact of residential development.
   c) The EIR does not address the capability of the public bus service to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32

18) The following comments are specifically applicable to Chapter 15 Parklands EIR-2459 Review Comments - Public Transportation – Rail. For additional information and a detailed discussion of the information supporting this comment, see Chapter 15.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) Rail schedules and service does not make public transportation by rail a viable alternative for most employees.
   c) The EIR does not address the capability of the public rail service to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32. 10.1

19) The following comments are specifically applicable to Chapter 16 Parklands EIR-2459 Review Comments - Qualty Housing & Greenhouse Emissions. For additional information and a detailed discussion of the information supporting this comment, see Chapter 16.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not address the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32

20) The following comments are specifically applicable to Chapter 17 Parklands EIR-2459 Review Comments - Walkability & Retail. For additional information and a detailed discussion of the information supporting this comment, see Chapter 17.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.
      (1) Determinants of walkability are not discussed.
      (2) Walkability and the proximity of sources for retail goods and services are not discussed.

(3) Increase in greenhouse gases created by the distant relationship of sources of retail goods and services and the need for transportation to access those sources is not discussed.

21) The following comments are specifically applicable to Chapter 18 Parklands EIR-2459 Review Comments – Employment. For additional information and a detailed discussion of the information supporting this comment, see Chapter 18.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.
   c) The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.
   d) The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.
   e) The EIR does not address the location of the proposed residential development and its relationship to distant sources of employment and the environmental impact of the need to use private modes of transportation to obtain employment nor does the EIR address the adverse impact on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32 10.1

22) The following comments are specifically applicable to Chapter 19 Parklands EIR-2459 Review Comments - Journey to Work. For additional information and a detailed discussion of the information supporting this comment, see Chapter 19.
   a) The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.
   b) The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.
   c) The EIR does not address the adverse impact of locating housing distant from work centers on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32.

Chapter 01
Parklands EIR-2459 Review Comments
- CEQA EIR Requirements

SUMMARY:

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.2

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environmental effects. 10.3

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern. 10.4

The EIR fails to recognize overcrowding of public facilities and the adverse effect of that overcrowding on the people. 10.5

The EIR does not address the impact of the downturn in the national and state economy and the resulting loss of revenues to the City of San Buenaventura which raises the issue of the City having sufficient revenues to meet expenses and make the residential development economically self-sustaining without to make additional subsidization from the general fund. Failure to adequately address this issue has the potential of not only creating an economic impact on the City, but a social impact on the general population created by the increased burden of paying additional taxes and fees to subsidize the impacts of residential development. 10.6

The EIR fails to place the whole record before the reviewing bodies in order that the magnitude of substantial evidence can be determined. 10.7

Information in other chapters contained in this report demonstrates and supports the contention that:

Scientific and technical information is incomplete as demonstrated by previously submitted DMND and Scoping Meeting Reports have been omitted, drainage study data and maps previously contained in the DMND have been omitted and previously submitted archaeological and cultural data have been omitted: 10.8

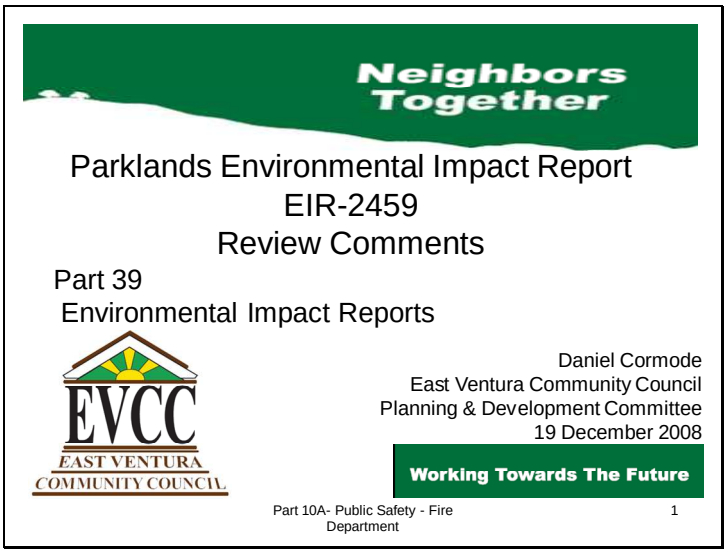
Views held by members of the public have been either withheld or omitted as demonstrated by eliminating comments to the DMND and Scoping Meeting; and

Reasonably foreseeable impacts are not addressed as evidenced by failure to address the magnitude of the impact of a greater than Q100 storm event, failure to identify the adverse impact of reclassifying Telegraph and Wells Roads from secondary arterial to collector roadways violation of the California Fire Code requirements, and the social and economic impact of overcrowded schools.

The 2005 General Plan EIR is incomplete and fails to quantify impacts and therefore cannot be cited in subsequent Initial Studies (IS), Negative Declarations (ND) or Environmental Impact Reports (EIRs). 10.9

The above statements are substantiated by information contained in the attached slides.

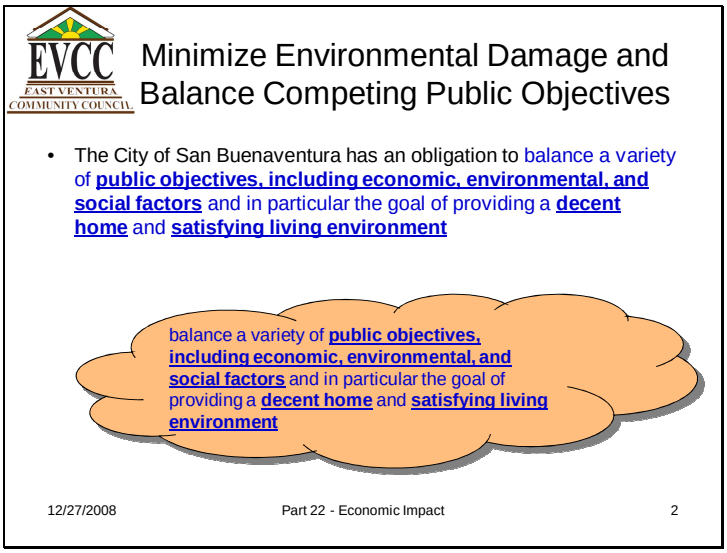
Slide 1



Part 39 – Environmental Impact Reports

•The Environmental Impact Report (EIR) for the proposed Parklands residential development shall be developed in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act. 10.10

Slide 2



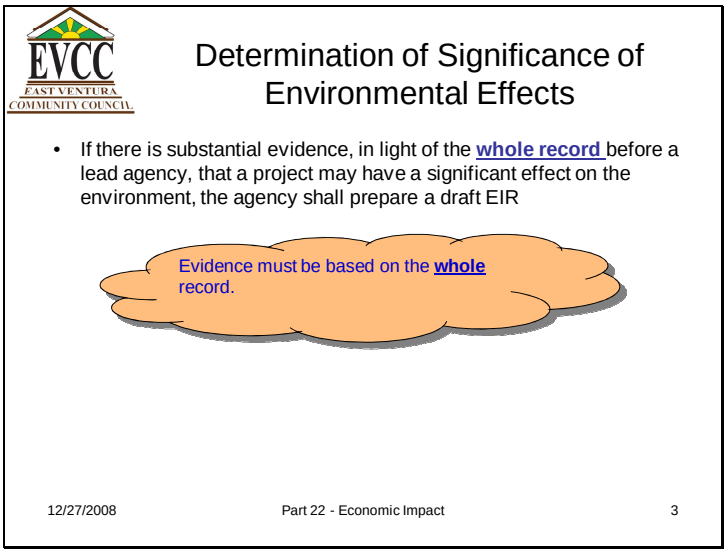
The EIR fails to identify the magnitude of the economic, environmental and social factors and impacts as a result of implementation of the subject residential development.

The EIR does not address the impact of the downturn in the national and state economy and the resulting loss of revenues to the City of San Buenaventura which raises the issue of the City having sufficient revenues to meet expenses and make the residential development economically self-sustaining without to make additional subsidization from the general fund. Failure to adequately address this issue has the potential of not only creating an economic impact on the City, but a social impact on the general population created by the increased burden of paying additional taxes and fees to subsidize the impacts of residential development. 10.10

CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of **public objectives, including economic, environmental, and social factors** and in particular **living environment** for every Californian.[1]

[1] Duty to Minimize Environmental Damage and Balance Competing Public Objectives, Title 14, California Code of Regulations, Chapter 3, Section 15021 (d),

Slide 3



The EIR fails to place the whole record before the reviewing bodies in order that the magnitude of substantial evidence can be determined.

Reports, comments and other related information submitted by both public and non-profit organizations have been omitted from the EIR as evidenced by comments from both the County of Ventura and East Ventura Community Council. 10.10

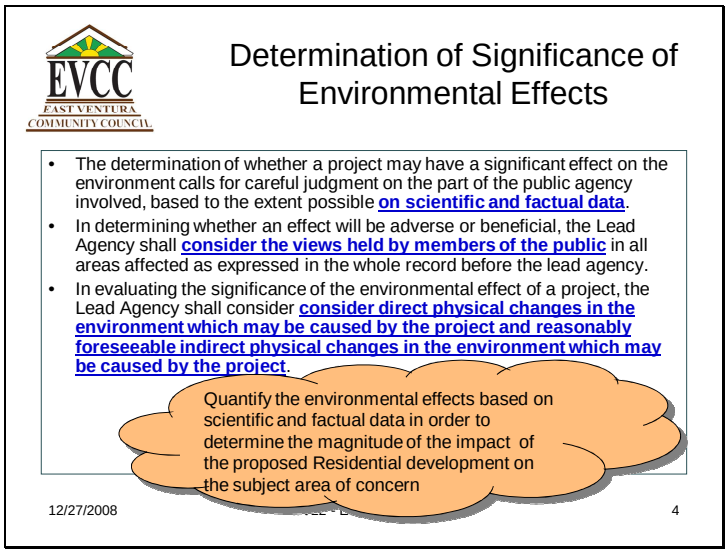
•(a) Determining whether a project may have a significant effect plays a critical role in the CEQA process.

•(1) If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR.

•(2) When a final EIR identifies one or more significant effects, the Lead Agency and each Responsible Agency shall make a finding for each significant effect and may need to make a statement of overriding considerations for the project.[2]

[2] Determination of Significance of Environmental Effects, Title 14, California Code of Regulations, Chapter 3, Section 15064 (a)

Slide 4



Information in other chapters contained in this report demonstrates and supports the contention that:

Scientific and technical information is incomplete as demonstrated by previously submitted DMND and Scoping Meeting Reports have been omitted, drainage study data and maps previously contained in the DMND have been omitted and previously submitted archaeological and cultural data have been omitted:

Views held by members of the public have been either withheld or omitted as demonstrated by eliminating comments to the DMND and Scoping Meeting; and

Reasonably foreseeable impacts are not addressed as evidenced by failure to address the magnitude of the impact of a greater than Q100 storm event, failure to identify the adverse impact of reclassifying Telegraph and Wells Roads from secondary arterial to collector roadways violation of the California Fire Code requirements. 10.10

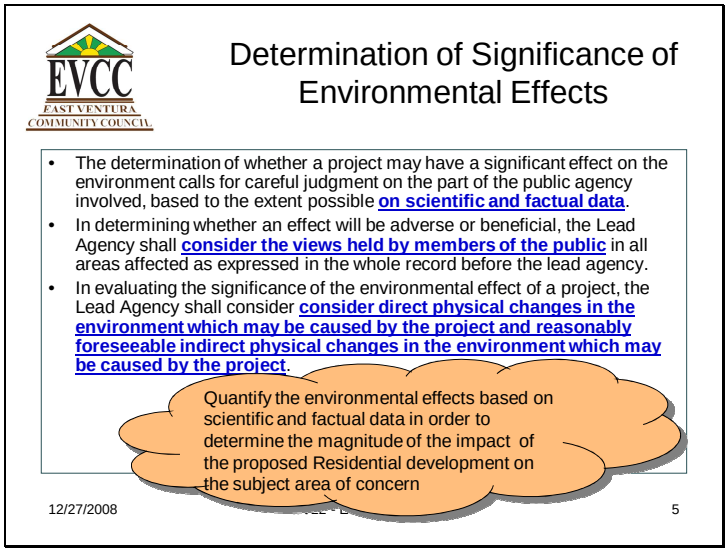
(b) The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible **on scientific and factual data**[3].

•(c) In determining whether an effect will be adverse or beneficial, the Lead Agency shall consider **the views held by members of the public** in all areas affected as expressed in the whole record before the lead agency.
•(d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider **direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project**.

[3] Determination of Significance of Environmental Effects, Title 14, California Code of Regulations, Chapter 3, Section 15064

•(1) A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. Examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant and possible odors from operation of the plant.
•(2) An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity and may lead to an increase in air pollution.
•(3) An indirect physical change is to be considered only if **that change is a reasonably foreseeable impact** which may be caused by the project.

Slide 5



10.10

The EIR fails to address forseeable impacts such as inadequate school facilities, impact of future development on roadway capacity and the increase in unmitigated drainage on surrounding private property.

• (d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider **direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project**.

•(1) A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. Examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant and possible odors from operation of the plant.
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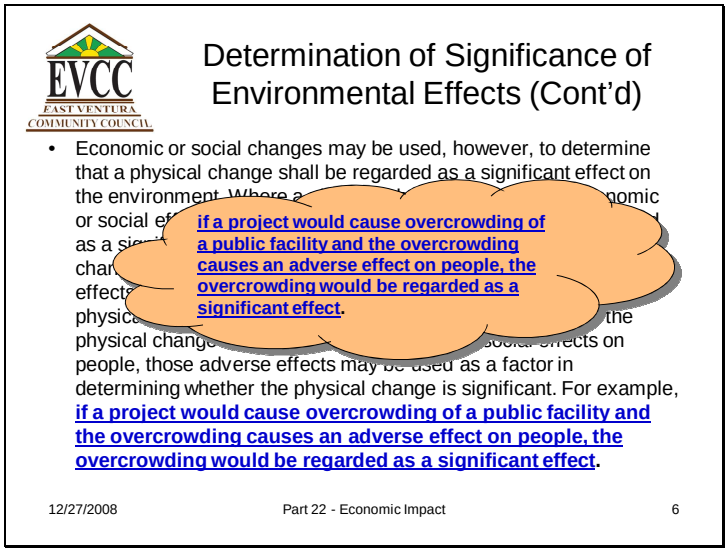
•(3) An indirect physical change is to be considered only if **that change is a reasonably foreseeable impact** which may be caused by the project.[4]

Slide 6



10.11

The EIR fails to quantify and determine the cumulative economic and social impact of overcrowded schools created by residential development.

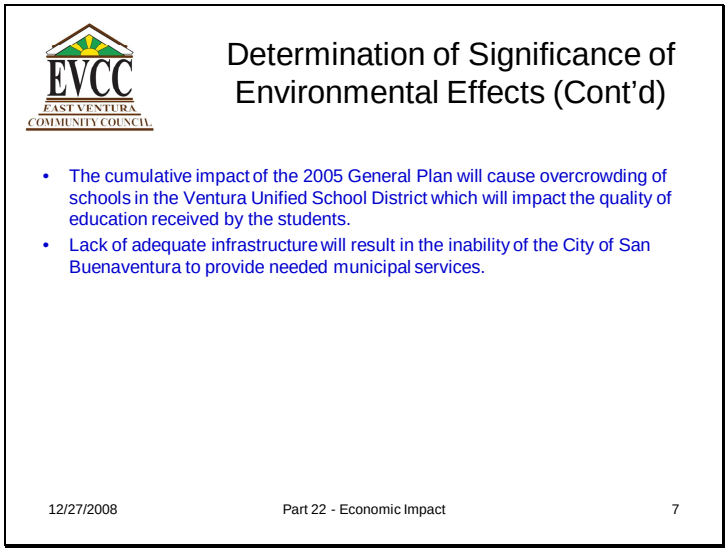
(e) Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, **if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.**

[4] Determination of Significance of Environmental Effects, Title 14, California Code of Regulations, Chapter 3, Section 15064

•Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment.

•If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, **if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect**.[5]

Slide 7



10.11

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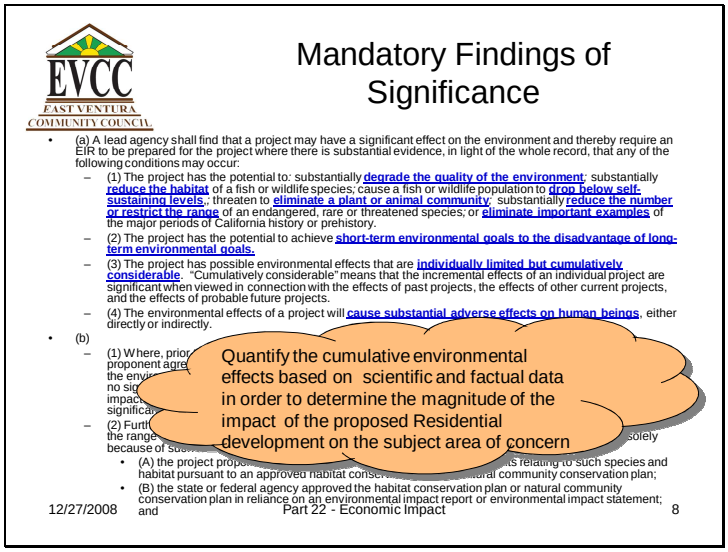
Slide 8



10.12

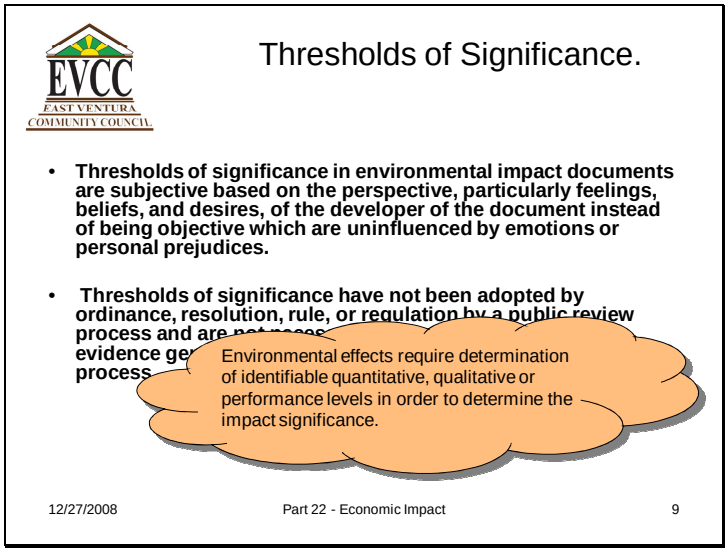
(a) A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur:

(1) The project has the potential to*:* substantially **degrade the quality of the environment***;* substantially **reduce the habitat** of a fish or wildlife species*;* cause a fish or wildlife population to **drop below self-sustaining levels**,*;* threaten to **eliminate a plant or animal community***;* substantially **reduce the number or restrict the range** of an endangered, rare or threatened species*;* or **eliminate important examples** of the major periods of California history or prehistory.

[6] Determination of Significance of Environmental Effects, Title 14, California Code of Regulations, Chapter 3, Section 15064

(2) The project has the potential to achieve **short-term environmental goals to the disadvantage of long-term environmental goals.**
(3) The project has possible environmental effects that are **individually limited but cumulatively considerable**. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
(4) The environmental effects of a project will **cause substantial adverse effects on human beings**, either directly or indirectly.[7]

Slide 9



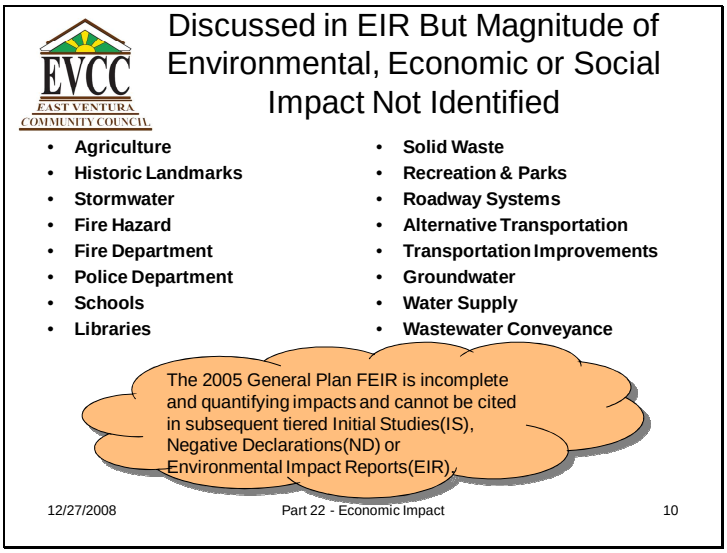
10.13

•(a) Each public agency is encouraged to **develop and publish thresholds of significance** that the agency uses in the determination of the significance of environmental effects. **A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect**, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.
•(b) Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence.[8]

[7] Mandatory Findings of Significance, Title 14, California Code of Regulations, Chapter 3, Section 15065

[8] Thresholds of Significance, Title 14, California Code of Regulations, Chapter 3, Section 15064.7

Slide 10



10.14

•The following environmental subjects were described and discussed in the 2005 General Plan Final Environmental Impact Report (FEIR) but the magnitude of the environmental, economic or social impacts were not quantified or identified. The 2005 General Plan FEIR is incomplete and cannot be cited in subsequent tiered Initial Studies(IS), Negative Declarations(ND) or Environmental Impact Reports(EIR)[9].

[9] Determination of Significance of Environmental Effects, Title 14, California Code of Regulations, Chapter 3, Section 15064

Slide 11

Impact on Agriculture

- The magnitude of the specific or cumulative economic or social impact of residential development on agriculture is not discussed or quantified:
  - Loss of production capacity.
  - Increase in production costs caused by necessary changes in processes, procedures or materials.
  - The social and economic impact of loss of agricultural employment

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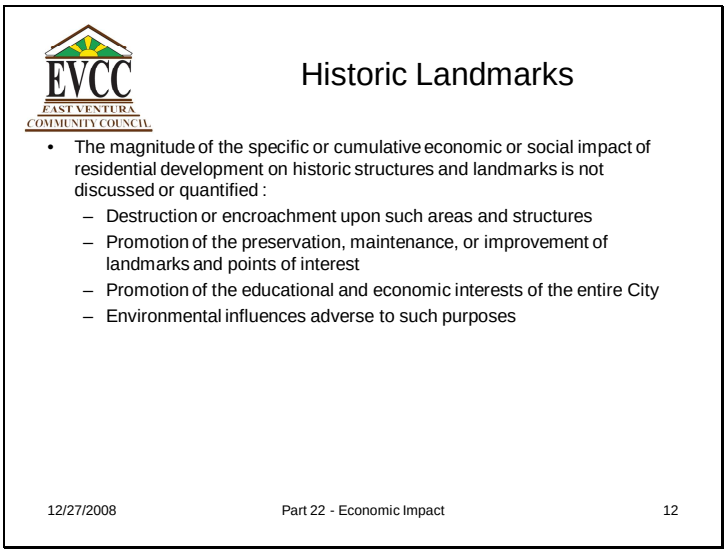
10.15

The placement of residential development adjacent to farmland can also have negative impacts on farming operations. Direct physical impacts include vandalism to farm equipment or fencing, and theft of fruits and vegetables. Soil compaction from trespassers or equestrians can also damage crop potential. These can result in indirect economic impacts. One study (Ventura County Agricultural Land Trust, 1996) showed that crop production in the first two rows adjacent to urban uses is about 20% lower than the rows beyond. Reduced air quality from adjacent urban development can also result in impacts to adjacent farmland. Placement of residences adjacent to cultivated agriculture can also have economic impacts to growers. Increased regulations and liability insurance to protect the farmer from adjacent urban uses cost time and money. Some farmers' sensitive to nearby residences voluntarily limit their hours of operation and do not intensively use the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering crop yields, which can potentially affect the long-term economic viability of the agricultural operation [10]

[10] Reference: 2005 City of San Buenaventura General Plan Final EIR, Page 4.2.20

Slide 12



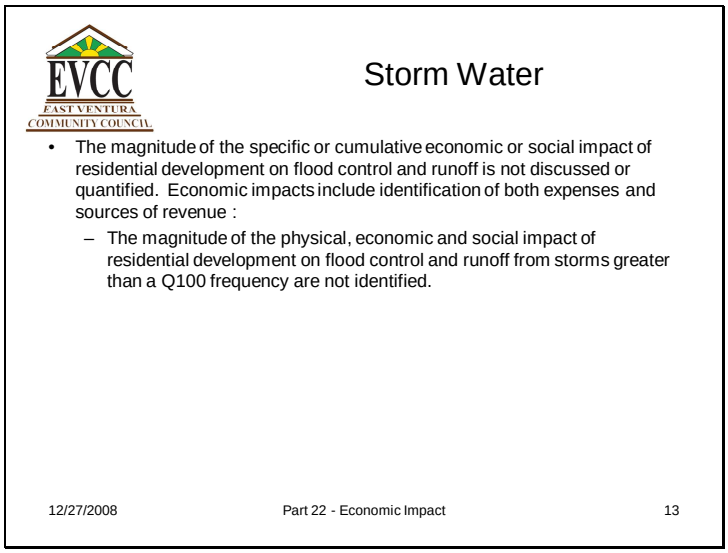
10.16

Historic Preservation:
•In addition to the designation of individual historical landmarks and points of interest, the Historic Preservation Committee, Planning Commission, and, ultimately, the City Council may designate certain areas of the City as Historic District (HD) Overlay Zones, pursuant to the City of Ventura Municipal Code, Chapter 23.340 and §24.455.310. The purpose of the HD Overlay Zone is to regulate a landmark, point of interest, or any combination thereof in order to:

- •A. Protect against destruction or encroachment upon such areas and structures
- •B. Encourage uses which promote the preservation, maintenance, or improvement of landmarks and points of interest
- •C. Assure that new structures and uses within such areas will be in keeping with the character to be preserved or enhanced
- •D. Promote the educational and economic interests of the entire City
- •E. Prevent creation of environmental influences adverse to such purposes.[11]

[11] Reference: 2005 City of San Buenaventura General Plan Final EIR, Page 4.5.8.

Slide 13



10.17

The primary effect of flooding, where urban encroachment on flood plains has occurred, is the threat to life and property. Floods may also create health and safety hazards and disruption of vital public services. Economic costs may include a variety of flood relief expenses, as well as investment in flood control facilities to protect endangered development. The extent of damage caused by any flood depends on the topography of the area flooded; depth, duration, and velocity of floodwaters; the extent of development in the floodplain; and the effectiveness of forecasting, warnings, and emergency operations. Encroachment onto floodplains, such as artificial fills and structures, reduces the capacity of the flood plain and increases the height of floodwater upstream of the obstructions. Impacts associated with each General Plan land use scenario are discussed below [12]

Scenario 1 – Intensification/Reuse Only. Most of the infill/intensification areas under this scenario are outside the 100- flood zone. However, portions of the North Avenue, Upper North Avenue, Arundell, and Auto Center districts are within the 100-year flood zone. General Plan Action 7.10 require proponents of any new developments within the 100-year floodplain to implement measures, as identified in the Flood Plain Ordinance, to protect structures from 100-year flood hazards. As required by the Flood Plain Ordinance, any future development within the 100-year flood zone would require a hydrologic/hydraulic analysis to show that they are protected from flood flows and a Letter of Map Revision (LOMR) filed and approved by FEMA prior to development approval. Compliance with these requirements would reduce flooding impacts to a less than significant level[13]

[12] 2005 General Plan FEIR, Page 4.8-16

[13] Reference: 2005 General Plan FEIR, Page 4.8-18

Slide 14

Fire Hazard

- The magnitude of the specific or cumulative economic or social impact of residential development on the availability of public services to protect property in hazardous areas ability of the flood control and runoff is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue:
  - Increased fire protection services
  - Increased protection from storm water runoff.
  -

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10.18

Impact PS-1 Development under any of the 2005 General Plan land use scenarios would increase the City's population and density of development, and introduce new development into high fire hazard areas. This would increase demand for fire protection services and potentially create the need for new fire protection facilities.[14]

[14] Reference: 2005 General Plan FEIR, Page 4.11-23

Slide 15

Fire Department

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of the fire department to provide adequate emergency medical services and fire protection or suppression is not discussed or quantified . Economic impacts include identification of both expenses and sources of revenue :
  - Medical emergencies.
  - Fire suppression.
  - Fire protection.
  - Hazardous materials.

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10.19

Fire Protection (Impact PS-1). 30 new firefighters needed to alleviate current deficiencies; one to two new fire stations and 9 to 18 new firefighters needed to serve the Ventura Harbor and Ventura Avenue areas; limited new development introduced adjacent to high fire hazard areas. [15]

[15] Reference: 2005 General Plan FEIR, Page 4.11-24

Slide 16

Police Department

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of the police department to provide adequate response to police emergencies not discussed or quantified . Economic impacts include identification of both expenses and sources of revenue :
  - Police protection.
  - Crime investigation.
  - Traffic control.

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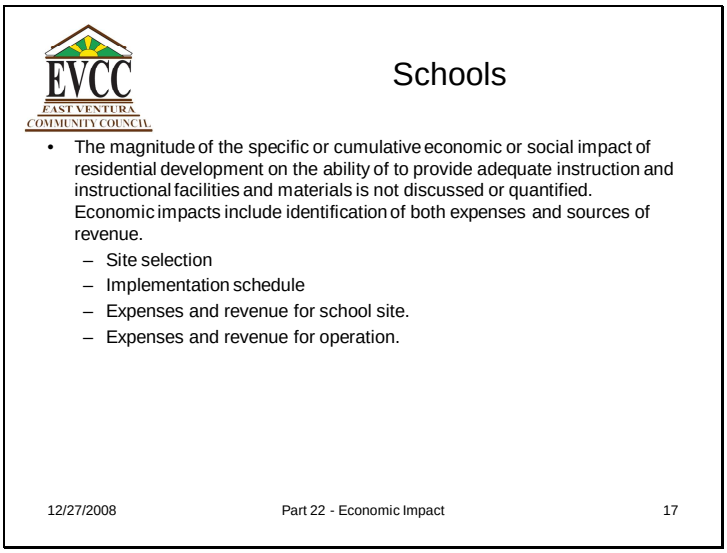
10.20

Police Protection (Impact PS-2). An additional 26 police officers needed to maintain current officers-residents ratio in 2025. New or expanded police facilities needed since the current headquarters is at capacity; Downtown storefront station also needed. [16]

[16] Reference: 2005 General Plan FEIR, Page 4.11-24

Slide 17



10.21

Schools (Impact PS-3). An estimated 3,486 new VUSD students projected by 2025 under this scenario. Based on Department of Education criteria, 2-3 new elementary schools needed and possibly a new middle school and new high school. Payment of State mandated fees reduce impacts to Class III, less than significant, per State law; nevertheless, limited available land for new schools may necessitate condemnation of property for new school sites and/or more intensive use of existing facilities.[17]

The total seat cost for 6,613 units of a 2,500 square foot dwelling unit residential development is estimated to be $54,557,250 with only $35,379,550 collected in developer fees leaving the school district and taxpayer to pay **$19,177,700.**.

[17] Reference: 2005 General Plan FEIR, Page 4.11-24

Slide 18

Libraries

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to provide adequate library facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection
  - Implementation schedule
  - Expenses and revenue for library site and materials.
  - Expenses and revenue for library operation.

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10.22

Libraries (Impact PS-4). An additional 78,153 square feet of library facilities needed to achieve desired 1 square foot/capita ratio in 2025. Funding needed for new facilities, but facilities could likely be provided without significant environmental effects.[18]

[18] Reference: 2005 General Plan FEIR, Page 4.11-24

Slide 19

Solid Waste

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to provide adequate solid water disposal facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection
  - Implementation schedule
  - Expenses and revenue for solid waste site.
  - Expenses and revenue for solid waste site operation.

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10.23

Solid Waste (Impact PS-5). Projected growth would increase solid waste sent to landfills by an estimated 84 tons per day by 2025. This is within the current available daily capacity, but area landfills are projected to close in the 2022-2027 time period. Absent an alternative means/location for disposing of waste, impacts are Class I, unavoidably significant.[19]

[19] Reference: 2005 General Plan FEIR, Page 4.11-24

Slide 20

Recreation & Parks

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to provide adequate recreation and park facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection
  - Implementation schedule
  - Expenses and revenue for recreation or park site.
  - Expenses and revenue for recreation or park site operation.

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10.24

Recreation/Parks (Impact PS-6). Projected population growth would generate demand for 212 acres of new parks by 2025 based on 10 acres/1,000 residents standard. Continued collection of required park fees and requirement of land dedication for parks could reduce impacts to Class III, less than significant. However, parks in older areas of
the City (Downtown, Ventura Avenue corridor, Midtown area) where available land is lacking and population growth is projected may experience shortages of neighborhood parks absent land dedication with larger projects. Large sites to accommodate citywide park facilities are also lacking under this scenario.[20]

[20] Reference: 2005 General Plan FEIR, Page 4.11-26

Slide 21

Roadway Systems

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to provide adequate roadways and transportation facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection and improvements required
  - Implementation schedule
  - Expenses and revenue for site right-of-way.
  - Expenses and revenue for roadway operation.

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10.25

Roadway System Impacts (Impact TC-1). One location – Wells Road and Darling Road intersection - requires additional (non-committed) improvements. Because feasible improvements are available for this deficiency, impacts are Class II, significant but mitigable.[21]

[21] Reference: 2005 General Plan FEIR, Page 4.12-21

Slide 22

Alternative Modes of Transportation

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to provide alternative modes of transportation and facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection and improvements required
  - Implementation schedule
  - Expenses and revenue for alternative modes of transportation sites.
  - Expenses and revenue for alternative mode of transportation operation.
  - Each resident of the City of San Buenaventura is currently subsidizing Gold Coast Transit at a rate of $28.18 per year.

12/27/2008 Part 22 - Economic Impact 22

10.26

Alternative Transportation Modes (Impact TC-2). Emphasis on intensification/reuse and mixed use development, in combination with proposed General Plan policies, generally enhance opportunities for alternative transportation modes. Impacts are Class IV, beneficial.[22]
$3,051,318/108,261 = $28.18/year/resident.[23]

[22] Reference: 2005 General Plan FEIR, Page 4.12-22

[23] Reference: 2005 General Plan FEIR, Page 4.12-22

Slide 23

Transportation Improvements

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to providing transportation improvements of transportation facilities is not discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection and transportation improvements required
  - Implementation schedule
  - Expenses and revenue for transportation improvement sites.
  - Expenses and revenue for transportation site improvement operation.

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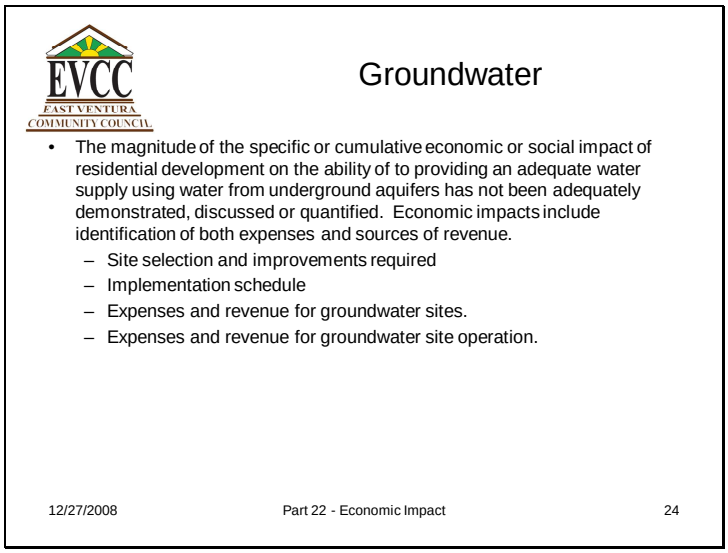
10.27

Year 2025 ICUs are illustrated on Figure 4.12-6. Transportation improvements to provide adequate capacity for this scenario are shown in Table 4.12-4. Year 2025 ICUs are listed in Table 4.12-5, which shows the ICU values under Baseline improvements only, and then the values obtained by adding the recommended additional improvements (labeled “non-committed” improvements). Scenario 1 results in one location requiring additional (non-committed) improvements. This location is the Wells Road and Darling Road intersection. [24]

[24] Reference: 2005 General Plan FEIR, Page 4.12-23

Slide 24



10.28

Groundwater. Under Scenario 1, there are no expansion areas that would be taken out of agriculture; therefore, no credits for additional groundwater sources available for new development in these areas. However, as discussed previously, agricultural lands within the existing SOI that are already designated for non-agricultural uses could be converted under this scenario. Using the agricultural irrigation factor of 2.5 feet per year, the total amount of water credit is 1,278 acre feet per year (AFY) (see Table 4.13-14). This amount is credited against the total projected water demand calculation for intensification/reuse that could occur under every scenario. Projected water demands for the various land uses and cumulative totals for Scenario 1 are shown in Table 4.13-15. As indicated in the table, growth accommodated under this Scenario would increase current water demand by 5.18 million gallons per day (mgd) or about 5,806 acre-feet per year (AFY). [25]

[25] Reference: 2005 General Plan FEIR, Page 4.13-18

Slide 25

Water Supply

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to providing an adequate water supply and distribution system using water from underground aquifers, rivers and lakes has not been adequately demonstrated, discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection and improvements required.
  - Distribution facility requirements and improvements.
  - Implementation schedule
  - Expenses and revenue for water supply sites and distribution facility construction.
  - Expenses and revenue for water supply site and distribution facility operation.

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10.28

Water Supply and Delivery (Impact U-1). Net demand increase of 4,528 AFY, resulting in overall demand of approximately 26,028 AFY in 2025. This is within projected supply. System upgrades needed in older parts of the City to improve pressure and fire flow, but can be achieved with significant secondary impacts. Impacts are Class
III, less than significant.[26]

[26] Reference: 2005 General Plan FEIR, Page 4.13-19

Slide 26

Wastewater Conveyance

- The magnitude of the specific or cumulative economic or social impact of residential development on the ability of to providing an adequate wastewater conveyance system has not been adequately demonstrated, discussed or quantified. Economic impacts include identification of both expenses and sources of revenue.
  - Site selection and improvements required.
  - Distribution wastewater facility requirements and improvements.
  - Implementation schedule
  - Expenses and revenue for wastewater conveyance and treatment site construction.
  - Expenses and revenue for wastewater conveyance and treatment site operation.

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10.29

Wastewater Conveyance and Treatment (Impact U-2). Projected increase in flow of 2.88 million gallons per day (mgd) at VWRF and 0.18 mgd at OVSD plant. Increases are within the capacities of both plants. Sewer line upgrades needed in many older neighborhoods, but can be achieved without significant secondary impacts. Impacts are Class III, less than significant[27]

[27] Reference: 2005 General Plan FEIR, Page 4.13-19

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.30

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative impacts of proposed residential developments on the subject area of concern.

The EIR fails to provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects. The discussion fails to focus on whether the impacts of the project would result in cumulative effects,

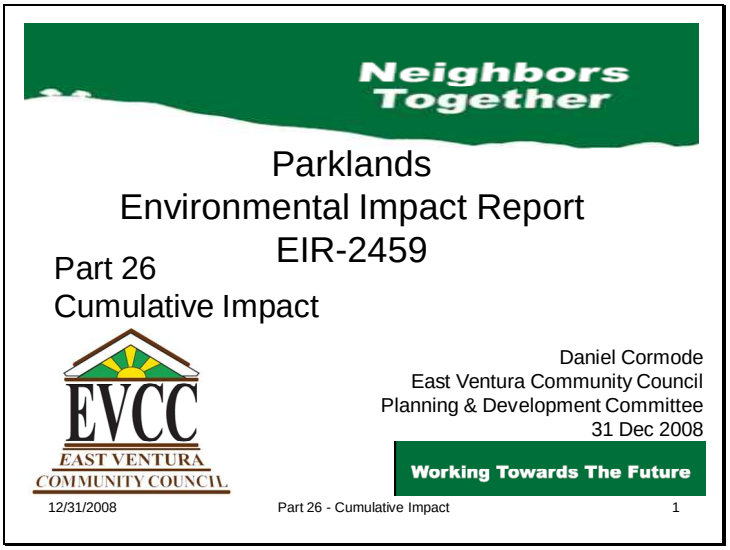
The EIR does not address the cumulative physical, economic or social impacts of other residential development.

The *CEQA Guidelines* require that an EIR provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects 10.31

The EIR does not address the cumulative physical, economic or social impacts of other residential development on the ability to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32.

The above statements are substantiated by information contained in the attached slides

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 26
Cumulative Impact
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
31 Dec 2008
Working Towards The Future
12/31/2008
Part 26 - Cumulative Impact
1

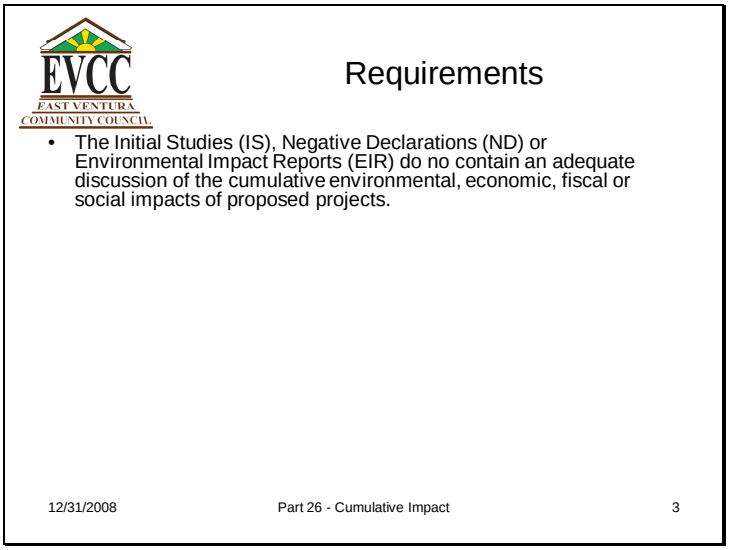
Slide 2

Cumulative Impact

- Requirements
- Basis for Analysis
- Probable Future Projects

12/31/2008 Part 26 - Cumulative Impact 2

Slide 3



The EIR fails to provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects. The discussion fails to focus on whether the impacts of the project would result in cumulative effects, 10.31

The *CEQA Guidelines* require that an EIR provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects. The discussion should focus on whether the impacts of the project would result in cumulative effects, and therefore need not consider cumulative impacts to which the project does not contribute

Slide 4

Basis for Analysis

- The 2005 General Plan Final Environmental Impact Report (FEIR) does not contain a list of past, present, and probable future projects
- The 2005 General Plan Final Environmental Impact Report (FEIR) does not quantify the cumulative magnitude or quantify the environmental, economic, fiscal or social impacts of:
  - **Past, present or future projects.**
  - **Regional or areawide conditions contributing to the cumulative impact**.

12/31/2008 Part 26 - Cumulative Impact 4

Basis for Analysis

The cumulative analysis shall be based upon either:

- a list of past, present, and probable future projects,or
- a summary of projections contained in an adopted general plan or related planning document (such as a regional growth plan), or in a certified environmental document, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

10.31

Slide 5

Probable Future Projects

- The 2005 General Plan Final Environmental Impact Report (FEIR) does not list probable future projects which meet one of the required definition:
  - 1) for which an application has been received at the time the notice of preparation is released;
  - 2) included in an adopted capital improvements program or other similar plan;
  - 3) included in a summary of projections of projects in a general plan or a similar plan;
  - 4) anticipated as later phase of a previously approved project (e.g. a subdivision); or
  - 5) for which money has been budgeted by a public agency.

12/31/2008 Part 26 - Cumulative Impact 5

10.31

Probable Future Projects

"Probable future projects"is defined in *CEQA Guidelines Section 15130(b)(1)(B)(2)* (http://www.ceres.ca.gov/topic/env_law/ceqa/guidelines/art9.html) as projects:

1) for which an application has been received at the time the notice of preparation is released;
2) included in an adopted capital improvements program or other similar plan;
3) included in a summary of projections of projects in a general plan or a similar plan;
4) anticipated as later phase of a previously approved project (e.g. a subdivision); or
5) for which money has been budgeted by a public agency.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.32

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment or the cumulative impact of other proposed residential developments on the subject.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative effects of other proposed residential developments on the subject area of concern.

Responses to EIR-2459 Notice of Preparation prepared and submitted by the East Ventura Community Council were not either acknowledged or included in Appendix A of EIR-2459 Initial Study Notice of Preparation Responses to Notice of Preparation. A copy of the letter containing a summary of the responses and supporting files and documentation to the Notice of Preparation prepared and submitted by the East Ventura Community Council are included as Attachment A.

Responses to the request for input for the EIR-2459 Scoping Meeting prepared and submitted by the East Ventura Community Council were not included in Appendix A of EIR-2459 Initial Study Notice of Preparation Responses to Notice of Preparation. A copy of the letter containing a inputs for the EIR-2459 Scoping Meeting prepared and submitted by the East Ventura Community Council are included as Attachment B. 10.33

Detailed issues and concerns submitted in writing by the East Ventura Community Council have not been specifically addressed as demonstrated by staff responses contained in the EIR. Copies of the responses are contained in Attachment C. The East Ventura Community Council representative stated that all detailed issues and concerns provided in the letter and accompanying Compact Disk were expected to be specifically addressed in the EIR..

The quantity, magnitude and omission of review comments provided by the East Ventura Community Council sufficiently demonstrate that EIR-2459 is inadequate and incomplete and that there has not

been a good faith effort at full disclosure and, therefore, fails to meet the CEQA Guidelines for a standard of adequacy.

10.33 The City of San Buenaventura has failed to respond to requests for public information pertinent to the review of the subject EIR and, as a result in failing to respond to the above request, has violated the California Public Records Act.

The above statements are substantiated by information contained in the following attachments.

From: Daniel Cormode [dcormode@sbcglobal.net]
Sent: Tuesday, April 08, 2008 8:30 PM
To: iholt@ci.ventura.ca.us; MIde@ci.ventura.ca.us; 'Hernandez, Nelson'
Cc: 'Cole, Rick'; council@ci.ventura.ca.us; 'Planning Commission'; drc@ci.ventura.ca.us; DANIEL CORMODE
Subject: City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration EIR-2459 Review Coments

Attachments: Parklands Specific Plan DMND Review - Water Supply 2008 04 06.pdf; General Plan FEIR 2005 Deficiencies - Water Supply Cover Ltr & Encl 2007 05 27.pdf; Parklands IS & DMND Review Comments 2008 04 08.pdf; Parklands Specific Plan DMND Review - Architectural & Cultural 2008 04 04.pdf; Parklands Specific Plan DMND Review - Density & Land Use 2008 04 06.pdf; Parklands Specific Plan DMND Review - Drainage 2008 04 04.pdf; Parklands Specific Plan DMND Review - Hazards & Soils 2008 04 04.pdf; Parklands Specific Plan DMND Review - Missing Documeentation 2008 04 06.pdf; Parklands Specific Plan DMND Review - Mobility 2008 04 04.pdf; Parklands Specific Plan DMND Review - New Urbanism Concepts 2008 04 06.pdf; Parklands Specific Plan DMND Review - Public Safety 2008 04 06.pdf; Parklands Specific Plan DMND Review - Schools 2008 04 06.pdf; Parklands Specific Plan DMND Review - Viewshed 2008 04 06.pdf 10.33

08 April 2008

From: East Ventura Community Council
11178 Carlos St.
Ventura, CA 93004

To: City of San Buenaventura (Ventura)
501 Poli Street
PO Box 99
Ventura, CA 93002
Attn: I. Holt

SubJ; City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration, EIR-2459 dated 12 Mar 2008

Ref: (a) City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration, EIR-2459 dated 12 Mar 2008
(b) Parklands Draft MND.pdf 03/13/2008 11:22 AM 55,156,409
(c) Parklands NOI.pdf 03/13/2008 11:22 AM 291,195
(d) *Title 14. California Code of Regulations,* Chapter 3. Guidelines for Implementation of the California Environmental Quality Act. Section 15063 . Initial Study

Encl: (1) Compact Disk of Files:

Parklands Specific Plan DMND Review - Architectural & Cultural 2008 04 04.pdf
Parklands Specific Plan DMND Review - Density & Land Use 2008 04 06.pdf
Parklands Specific Plan DMND Review - Drainage 2008 04 04.pdf
Parklands Specific Plan DMND Review - Missing Documeentation 2008 04 06.pdf
Parklands Specific Plan DMND Review - Hazards & Soils 2008 04 04.pdf
Parklands Specific Plan DMND Review - Mobility 2008 04 04.pdf
Parklands Specific Plan DMND Review - New Urbanism Concepts 2008 04 06.pdf
Parklands Specific Plan DMND Review - Public Safety 2008 04 06.pdf
Parklands Specific Plan DMND Review - Schools 2008 04 06.pdf
Parklands Specific Plan DMND Review - Viewshed 2008 04 06.pdf
Parklands Specific Plan DMND Review - Water Supply 2008 04 06.pdf
General Plan FEIR 2005 Deficiencies - Water Supply Cover Ltr & Encl 2007 05 27.pdf

1. Reference (a) is a City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration which forwarded references (b) and (c) for review and comment by 16 Apr 2008 stating “The City of Ventura has performed a comprehensive evaluation of the potential impacts for this project in accordance with the State CEQA Guidelines and has determined that there is no substantial evidence the proposed project may have significant effect on the environment”. Reference (b) is an electronic copy of a City of Ventura Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration , dated 12 Mar 2008. 10.33

2. All phases of project planning, implementation, and operation must be considered in the Initial Study of the project. Since a lead agency must consider all impacts of a project, consultation provides access to the expertise of other agencies in evaluating a project. In *Sundstrom v. Mendocino* (1988) 202 Cal. App. 3d 296, the court held that "some degree of interdisciplinary consultation may be necessary on an initial study as well as in preparation of an EIR." It also stated that an agency must provide the information it used to reach its conclusions and that a checklist unsupported by data and facts is not sufficient for an adequate Initial Study. The Initial Study shall contain a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. Since the proposed project is part of an urban center to be located away from the Victoria Corridor and Downtown Specific Plan area the EIR must discuss the potential economic and social consequences of the project, if the proposed urban center would take business away from the downtown and thereby cause business closures and eventual physical deterioration of the downtown.

3. Furthermore, the Wells-Saticoy Community Plan and associated Initial Study/Environmental Impact Report is under development which will identify future requirements, costs, and mechanisms for funding those requirements has yet to be completed.

4. Comments contained in the files contained in Enclosure (1) demonstrate that the data contained in references (b) and (c) is incomplete and does not contain sufficient information to demonstrate that the proposed project's technical, economic or environmental impacts have been considered.

5. For additional information, please contact Daniel Cormode by telephone at 805-647-4063 or by e-mail at dcormode@sbcglobal.net.

6. Comments and information contained in Enclosure (1) also applies to the Wells-Saticoy Community Plan Environmental Impact Report. 10.33
R/

Daniel Cormode
For W. C. Roderick

Parklands IS & DMND Review
Letter & Files EIR-2459

Microsoft Office PowerPoint 97-2003 Presentation

Parklands Specific Plan DMND Review - Architectural & Cultu...
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Density & Land Use ...
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Drainage 2008 04 04
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Hazards & Soils 2008...
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Missing Documentati...
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Mobility 2008 04 04
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Parklands Specific Plan DMND Review - Schools 2008 04 06
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Viewshed 2008 04 06
Microsoft Office PowerPoint 9...

Parklands Specific Plan DMND Review - Water Supply 2008 0...
Microsoft Office PowerPoint 9...

10.33

Microsoft Office Word 97 - 2003 Document

Parklands IS & DMND Review Comments 2008 04 07
Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Architectural & Cultu...
Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Density & Land Use ...
Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Drainage 2008 04 04
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Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Schools 2008 04 06
Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Viewshed 2008 04 06
Microsoft Office Word 97 - 20...

Parklands Specific Plan DMND Review - Water Supply 2008 0...
Microsoft Office Word 97 - 20...

28 October 2008

From: East Ventura Community Council
11178 Carlos St.
Ventura, CA 93004

To: City of San Buenaventura
PO Box 99
Ventura, CA 93002
Attn: Iain Holt, Acting Senior Planner

Subj: CITY OF SAN BUENAVENTURA ENVIRONMENTAL IMPACT REPORT,
Case No. EIR-2459, PARKLANDS

Ref	Description
	Notice of Scoping Meeting, Draft Focused Environmental Report, Parklands
(a)	Specific Plan and Tentative Tract Map, EIR-2459dated 15 Oct 2008.
(b)	Planning & Development Part 01 Planned Projects 2008 08 08.ppt
(c)	Planning & Development Part 02 Schools 2008 08 09.ppt
(d)	Planning & Development Part 03 Water Supply 2008 07 03.ppt
(e)	Planning & Development Part 04 Walkability & Retail 2008 07 04.ppt
(f)	Planning & Development Part 05 Employment 2008 07 15.ppt
(g)	Planning & Development Part 06 Traffic 2008 09 01.ppt
(h)	Planning & Development Part 07 Parking 2008 07 05.ppt
(i)	Planning & Development Part 08 Public Transportation - Bus 2008 07 06.ppt
(j)	Planning & Development Part 09 Circulation 2007 11 09.ppt
(k)	Planning & Development Part 10A Public Safety - Fire Department 2008 10 28.ppt
(l)	Planning & Development Part 10B Public Safety - Police Department 2008 07 06.ppt
(m)	Planning & Development Part 11 Neighborhood Compatabiility 2007 11 09.ppt
(n)	Planning & Development Part 12 Land Use Changes 2007 11 09.ppt
(o)	Planning & Development Part 13 Specific & Community Plans 2007 11 09.ppt
(p)	Planning & Development Part 14 Historic Buildings 2007 11 09.ppt
(q)	Planning & Development Part 15 Notice of Preparation Initial Studies 20071110.ppt
(r)	Planning & Development Part 17 New Urbanism Concepts 2008 07 15.ppt
(s)	Planning & Development Part 20 Street Widths & Setbacks 2008 07 15.ppt
(t)	Planning & Development Part 21 Journey to Work 2008 07 15.ppt
(u)	Planning & Development Part 22 Economic Impact 2008 07 22.ppt
(v)	Planning & Development Part 23 Public Transportation - Rail 2008 07 06.ppt

10.33

(w) Planning & Development Part 24 Viewshed Protection.ppt
(x) Planning & Development Part 25 Retail Sales 2008 07 12.ppt
(y) Planning & Development Part 26 - Cumulative Impact.ppt
(z) Planning & Development Part 27 Stormwater Treatment 2008 07 15.ppt
(aa) Planning & Development Part 28 Brown Barranca Spillover 2008 06 05.ppt
(ab) Planning & Development Part 29 Architectural and Cultural 2008 07 13.ppt
(ac) Planning & Development Part 30 Drainage 2008 05 24.ppt
(ad) Planning & Development Part 31 Hazards & Soils 2008 04 04.ppt
(ae) Planning & Development Part 32 Expected Neighborhood Growth 2008 08 08.ppt
(af) Planning & Development Part 33 Covering 101 2008 07 20.ppt
(ag) Planning & Development Part 34 - Greening 2008 07 20.ppt
(ah) Planning & Development Part 35 Where Does It Stop 2008 07 21.ppt
(ai) Planning & Development Part 37 Future Traffic After SOAR 2008 09 19.ppt
(aj) Planning & Development Part 38 Swales 2008 09 28.ppt

Encl: (1) Compact Disc (CD) with Files 10.33

1. Reference (a) is an announcement of a Draft Focused Environmental Report Scoping Meeting for the Parklands Specific Plan and Tentative Tract Map, EIR-2459.

2. Comments to the subject document are forwarded in the form of PowerPoint Presentations which identify issues and deficiencies in reference (a):

A. Reference (b) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development on housing and population.

B. Reference (c) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development on schools such as: Exceeding capacity; fiscal impacts on the public, Site Selection Study; compatibility with California State Department of Education Site Selection Criteria; and lack of a planned future school site.

C. Reference (d) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development on the water supply including: non-compliance with CEQA guidelines, drought conditionsand ; demonstrations of the aquifers to meet future requirements.

D. Reference (e) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development in the failure to provide the necessary physical and retail/fiscal environment characteristics required to sustain and support a walkable neighborhood.

E. Reference (f)) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development on employment including: Housing not being provided near centers of employment; New development being built in housing rich neighborhoods distant from job rich centers; and, the impact on lower income households as a result of inadequate public transit.

F. Reference (g) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development on traffic and the need for the automobile due to the distance from employment, educational, retail and medical care facilities.

G. Reference (h) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development in the failure to provide adequate parking and the need for automobile transportation.

H. Reference (i) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of proposed residential development the failure of the public bus system to meet riders needs due to city topography and the inordinate time required to use bus transportation instead of the automobile.

I. Reference (j) identifies issues and deficiencies in reference (a) in the discussion of the adverse cumulative environmental impact of proposed residential development on circulation: Decreasing street widths, Non-compliance with street standards and narrow arterial streets

J. Reference (k) identifies issues and deficiencies in reference (a) in the discussion of the adverse cumulative environmental impact of proposed residential development on fire safety such as: Non-compliance with the California Fire Code; Increased response time; and, changes in incident rates.

K. Reference (l) identifies issues and deficiencies in reference (a) in the discussion of the adverse cumulative environmental impact of proposed residential development on the police department. 10.33

L. Reference (m)) identifies issues and deficiencies in reference (a) in the discussion of the adverse cumulative environmental impact of proposed residential development on neighborhood compatibility: Decreased parcel size; Excessive building heights; Increased density; Adverse impact on scenic corridors; and, narrow road widths.

M. Reference (n) identifies issues and deficiencies in reference (a) in the discussion of the adverse cumulative environmental impact of proposed residential development on land use changes.

N. Reference (o) identifies issues and deficiencies in reference (a) in the discussion of the adverse and incompatible cumulative environmental impact of community plans proposed residential development.

O. Reference (p) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of residential development on neighboring historic buildings within the Wells-Saticoy community.

P. Reference (q) identifies issues and deficiencies in Initial Studies.

Q. Reference (r) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of residential development based on new urbanism principles. Specifically discussed are inconsistencies between new urbanism principles and the physical location, economic and demographic chanracteristics.

R. Reference (s) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of residential development on: Street Widths; Inhibiting future expansion and neighborhood compatibility.

S. Reference (t) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of the location of residential development on the journey to work. The distant

location of the proposed residential development from employment centers adds an additional 7,599,592 miles of travel for work annually.

T. Reference (u) identifies issues and deficiencies in reference (a) in the discussion of the economic impact of residential development as required by the California Environmental Quality Act (CEQA). The economic impact of the capital improvements to support future residential development is estimated to be $141,646,193. Furthermore, numerous environmental impact issues are identified in the 2005 General Plan Final EIR (FEIR) without any discussion of the economic/fiscal impact, thereby, precluding citation of the FEIR.

U. Reference (v)) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of residential development and the inability of rail transportation to meet requirements of the working community.

V. Reference (w) identifies issues and deficiencies in reference (a) in the discussion of the environmental impact of residential development on the viewshed. Not discussed are the impacts of freeway soundwalls and high buildings along the view corridors.

W. Reference (x) identifies issues and deficiencies in reference (a) in the discussion the environmental impact of residential development on retail sales. The expected sales leakage resulting from locating projects distant from the retail centers is estimated to be $14,739,840 annually.

X. Reference (y) identifies issues and deficiencies in reference (a) in the discussion of the cumulative environmental impact of residential development as required by CEQA Guidelines. Furthermore, the Potential Expansion Areas identified in the 2005 General Plan Final EIR probably do not meet the definitions of a future project as required by CEQA. 10.33

Y. Reference (z) identifies issues and deficiencies in reference (a) in the discussion of environmental impact of residential development on stormwater treatment. In addition to that discussed in reference (z), stormwater treatment and 'greening' principles discussed at the 14 July 2008 City Council Meeting are not included.

Z. Reference (aa) identifies issues and deficiencies in reference (a) in the discussion of environmental imppact of residential development on Brown Barranca Spillover

AA. Reference (ab) identifies issues and deficiencies in reference (a) in the discussion of environmental impact of residential development on architectural and cultural resources.

AB. Reference (ac) identifies issues and deficiencies in reference (a) in the discussion of environmental impact of residential development on drainage.

AC. Reference (ad) identifies issues and deficiencies in reference (a) in the discussion of environmental impact of residential development on hazards and soils.

AD. Reference (ae) provides tabular data to support the housing and population growth estimates contained in reference (b).

AE. Reference (af) identified issues pertaining to the proposed covering of US 101.

AF. Reference (ag) identified issues pertaining to greening which required addressing.

AG. Reference (ah) identifes issues with future development.

AH. Reference (ai) address issues with future traffic after expiration of the SOAR Initiative.

AI. Reference (aj) addresses issues created with the implementation of swales.

3. Attached are copies of correspondence also related to the above subject.

4. For additional information, please contact Daniel Cormode by telephone at 805-647-4063 or be e-mail at dcormode@sbcglobal.net. 10.33

Daniel Cormode, Chairman
Planning & Development Committee

08 April 2008

From: East Ventura Community Council
11178 Carlos St.
Ventura, CA 93004

To: City of San Buenaventura (Ventura)
501 Poli Street
PO Box 99
Ventura, CA 93002
Attn: I. Holt

SubJ; City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration, EIR-2459 dated 12 Mar 2008

Ref: (a) City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration, EIR-2459 dated 12 Mar 2008
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10.33

Encl: (1) Compact Disk of Files:
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Parklands Specific Plan DMND Review - Density & Land Use 2008 04 06.pdf
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Parklands Specific Plan DMND Review - Schools 2008 04 06.pdf
Parklands Specific Plan DMND Review - Viewshed 2008 04 06.pdf
Parklands Specific Plan DMND Review - Water Supply 2008 04 06.pdf
General Plan FEIR 2005 Deficiencies - Water Supply Cover Ltr & Encl 2007 05 27.pdf

1. Reference (a) is a City of San Buenaventura Notice of Intent to Adopt a Mitigated Negative Declaration which forwarded references (b) and (c) for review and comment by 16 Apr 2008 stating “The City of Ventura has performed a comprehensive evaluation of the potential impacts for this project in accordance with the State CEQA Guidelines and has determined that there is no substantial evidence the proposed project may have significant effect on the environment”. Reference (b) is an electronic copy of a City of Ventura Parklands Specific Plan Draft Initial Study and Mitigated Negative Declaration , dated 12 Mar 2008.

2. All phases of project planning, implementation, and operation must be considered in the Initial Study of the project. Since a lead agency must consider all impacts of a project, consultation provides access to the expertise of other agencies in evaluating a project. In *Sundstrom v. Mendocino* (1988) 202

Cal. App. 3d 296, the court held that "some degree of interdisciplinary consultation may be necessary on an initial study as well as in preparation of an EIR." It also stated that an agency must provide the information it used to reach its conclusions and that a checklist unsupported by data and facts is not sufficient for an adequate Initial Study. The Initial Study shall contain a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. Since the proposed project is part of an urban center to be located away from the Victoria Corridor and Downtown Specific Plan area the EIR must discuss the potential economic and social consequences of the project, if the proposed urban center would take business away from the downtown and thereby cause business closures and eventual physical deterioration of the downtown. 10.33

3. Furthermore, the Wells-Saticoy Community Plan and associated Initial Study/Environmental Impact Report is under development which will identify future requirements, costs, and mechanisms for funding those requirements has yet to be completed.

4. Comments contained in the files contained in Enclosure (1) demonstrate that the data contained in references (b) and (c) is incomplete and does not contain sufficient information to demonstrate that the proposed project's technical, economic or environmental impacts have been considered.

5. For additional information, please contact Daniel Cormode by telephone at 805-647-4063 or by e-mail at dcormode@sbcglobal.net.

6. Comments and information contained in Enclosure (1) also applies to the Wells-Saticoy Community Plan Environmental Impact Report.
R/

Daniel Cormode
For W. C. Roderick

From: Daniel Cormode [mailto:dcormode@sbcglobal.net]
Sent: Wednesday, June 04, 2008 7:53 PM
To: 'Hernandez, Nelson'
Cc: 'Cole, Rick'; 'Councilmembers'; 'Rangwala, Kaizer'
Subject: RE: California Environmental Quality Act (CEQA) and Cumulative/Fiscal Impact

Nelson,

I believe the below issues stated in my e-mail dated June 01, 2008 are subject to CEQA and would expect discussion of those issues to be identified, quantified and discussed in all current and future environmental documents developed by the City of San Buenaventura.

> To my knowledge, there have been no cumulative physical, environmental or fiscal impact analyses performed to specifically **identify and quantify the specific resources and infrastructure requirements** nor have the **magnitude of the capital or operating expenditures or revenue** sources been identified to meet those requirements. The impact of physically planting a dwelling unit in the ground has generally been adequately identified and the specific plans paint a flowery picture of the benefits of new urbanism and smart growth, however, the benefits and related costs have not been quantified nor have requirements and locations for retail, commercial, industrial, manufacturing, educational and public facilities which provide both employment, goods and services have neither been identified or quantified.

Without first identifying and quantifying specific resources and infrastructure requirements and subsequently identifying the capital and operating expenditures and revenues to meet those requirements, the economic or social impact of the proposed project cannot be determined as required by Sections 15021 and 15064 of Title 14, California Code of Regulations, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act which are shown below. 10.33

Furthermore, specific plans under development cite numerous new urbanism and smart growth principles which supposedly result in a more environmentally friendly project and 'green practices'. If those cited principles truly have a positive impact on the environment, then the environmental analysis should quantify, validate and verify those benefits.

An example of an area of concern is continued development, which creates additional demands on the water supply infrastructure and which if not met, could have an adverse health, safety or economic impact on the public.

> Title 14. California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act
>
> > Section 15021. Duty to Minimize Environmental Damage and Balance Competing Public Objectives
> >
> > > (d) CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including **economic, environmental, and social factors** and in

particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.

15064. Determining the Significance of the Environmental Effects Caused by a Project
(e) Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, **economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people**, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect

R/

Daniel Cormode
805-647-4063 10.33

From: Hernandez, Nelson [mailto:nhernandez@ci.ventura.ca.us]
Sent: Monday, June 02, 2008 1:59 PM
To: Daniel Cormode
Cc: Cole, Rick; Councilmembers; Rangwala, Kaizer
Subject: RE: California Environmental Quality Act (CEQA) and Cumulative/Fiscal Impact

Dan,
Thank you for your email. My comments are below in blue.

-----Original Message-----
From: Daniel Cormode [mailto:dcormode@sbcglobal.net]
Sent: Sunday, June 01, 2008 3:33 PM
To: Hernandez, Nelson
Cc: Cole, Rick; Councilmembers; Rangwala, Kaizer; DANIEL CORMODE
Subject: California Environmental Quality Act (CEQA) and Cumulative/Fiscal Impact
Nelson,

An analysis of data from various sources of planned and future possible residential development project submissions such as community meetings, planning commission meetings and city council meetings in

the City of San Buenaventura has resulted in the determination that there are approximately 6,613 dwelling units either planned or are part of future residential projects. The total of 6,613 planned or future residential projects from the period of 2005-2008 comprise from 64% to 88% of the total 7,512 or 10,241 projected dwelling units planned to be built during the current 2005 General Plan period of 2005-2025. The size of the Wells-Saticoy Community is expected to double as a result of planned or future residential projects. It is unclear where these numbers come from hence I do not accept the premise that they are correct.

The *CEQA Guidelines* require that an EIR provide a discussion of cumulative impacts, which is a change in the environment that results from adding the effect of the project to those effects of closely-related past, present and probable future projects. The discussion should focus on whether the impacts of the project would result in cumulative effects, and therefore need not consider cumulative impacts to which the project does not contribute. The cumulative analysis should be based upon past, present, and probable future projects and a summary of projections contained in an adopted general plan or related planning document or in a certified environmental document, which described or evaluated regional or areawide conditions contributing to the cumulative impact. We agree that cumulative impacts should be considered. 10.33

To my knowledge, there have been no cumulative physical, environmental or fiscal impact analyses performed to specifically identify and quantify the specific resources and infrastructure requirements nor have the magnitude of the capital or operating expenditures or revenue sources been identified to meet those requirements. The impact of physically planting a dwelling unit in the ground has generally been adequately identified and the specific plans paint a flowery picture of the benefits of new urbanism and smart growth, however, the benefits and related costs have not been quantified nor have requirements and locations for retail, commercial, industrial, manufacturing, educational and public facilities which provide both employment, goods and services have neither been identified or quantified. These comments, while legitimate planning issues, are not subject to CEQA.

It is recommended that all Negative Mitigated Declarations (MNDs) and Environmental Impact Reports (EIRs) both currently under development and planned for future development include a discussion of the above elements.

I look forward to hearing from you in the near future and if you have any questions or need any additional information, please feel free to contact my by telephone at 805-647-4063 or by e-mail at dcormode@sbcglobal.net.

R/

Daniel Cormode
805-647-4063

City of SBV EIR-2459 Scoping Meeting Announcement Parklands 2008 10 15.pdf
Planning & Development Part 01 Planned Projects 2008 08 08.ppt
Planning & Development Part 02 Schools 2008 08 09.ppt
Planning & Development Part 03 Water Supply 2008 07 03.ppt
Planning & Development Part 04 Walkability & Retail 2008 07 04.ppt
Planning & Development Part 05 Employment 2008 07 15.ppt
Planning & Development Part 06 Traffic 2008 09 01.ppt
Planning & Development Part 07 Parking 2008 07 05.ppt
Planning & Development Part 08 Public Transportation - Bus 2008 07 06.ppt
Planning & Development Part 09 Circulation 2007 11 09.ppt
Planning & Development Part 10A Public Safety - Fire Department 2008 10 28.ppt
Planning & Development Part 10B Public Safety - Police Department 2008 07 06.ppt
Planning & Development Part 11 Neighborhood Compatabiility 2007 11 09.ppt
Planning & Development Part 12 Land Use Changes 2007 11 09.ppt 10.33
Planning & Development Part 13 Specific & Community Plans 2007 11 09.ppt
Planning & Development Part 14 Historic Buildings 2007 11 09.ppt
Planning & Development Part 15 Notice of Preparation Initial Studies 20071110.ppt
Planning & Development Part 17 New Urbanism Concepts 2008 07 15.ppt
Planning & Development Part 20 Street Widths & Setbacks 2008 07 15.ppt
Planning & Development Part 21 Journey to Work 2008 07 15.ppt
Planning & Development Part 22 Economic Impact 2008 07 22.ppt
Planning & Development Part 23 Public Transportation - Rail 2008 07 06.ppt
Planning & Development Part 24 Viewshed Protection.ppt
Planning & Development Part 25 Retail Sales 2008 07 12.ppt
Planning & Development Part 26 - Cumulative Impact.ppt
Planning & Development Part 27 Stormwater Treatment 2008 07 15.ppt
Planning & Development Part 28 Brown Barranca Spillover 2008 06 05.ppt
Planning & Development Part 29 Architectural and Cultural 2008 07 13.ppt
Planning & Development Part 30 Drainage 2008 05 24.ppt
Planning & Development Part 31 Hazards & Soils 2008 04 04.ppt
Planning & Development Part 32 Expected Neighborhood Growth 2008 08 08.ppt
Planning & Development Part 33 Covering 101 2008 07 20.ppt
Planning & Development Part 34 - Greening 2008 07 20.ppt
Planning & Development Part 35 Where Does It Stop 2008 07 21.ppt

Planning & Development Part 37 Future Traffic After SOAR 2008 09 19.ppt
Planning & Development Part 38 Swales 2008 09 28.ppt
EIR-2459 Scoping Meeting Comments 2008 10 29.pdf
E-mail 2008 04 08 2030 City of SBV NOI MND EIR-2459 Review Comments.pdf

Parklands IS & DMND Review Comments 2008 04 08.pdf
Parklands Specific Plan DMND Review - Architectural & Cultural 2008 05 04.pdf
Parklands Specific Plan DMND Review - Density & Land Use 2008 04 06.pdf
Parklands Specific Plan DMND Review - Drainage 2008 05 02 Document.pdf
Parklands Specific Plan DMND Review - Hazards & Soils 2008 04 04.pdf
Parklands Specific Plan DMND Review - Missing Documeentation 2008 04 06.pdf
Parklands Specific Plan DMND Review - Mobility 2008 04 04.pdf
Parklands Specific Plan DMND Review - New Urbanism Concepts 2008 04 06.pdf
Parklands Specific Plan DMND Review - Public Safety 2008 04 06.pdf
Parklands Specific Plan DMND Review - Schools 2008 04 06.pdf
Parklands Specific Plan DMND Review - Viewshed 2008 04 06.pdf
Parklands Specific Plan DMND Review - Water Supply 2008 04 06.pdf
General Plan FEIR 2005 Deficiencies - Water Supply Cover Ltr & Encl 2007 05 27.pdf

10.33

The quantity, magnitude and omission of review comments provided by the East Ventura Community Council sufficiently demonstrate that EIR-2459 is inadequate and incomplete and that there has not been a good faith effort at full disclosure and, therefore, fails to meet the CEQA Guidelines for a standard of adequacy.

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

Annotations to the Summary of Scoping Meeting Comments contained in EIR-2459, Table 1-2, sufficiently demonstrate that EIR-2459 is inadequate and incomplete and that there has not been a good faith effort at full disclosure and, therefore, fails to meet the CEQA Guidelines for a standard of adequacy.

EIR-2459
Table 1-2
Annotated Summary of Scoping Meeting Comments

Comment Topic	Notes
Architectural and Cultural Resources	Impacts are discussed in the Initial Study (Appendix A) and were found to be less than significant based on a Phase I Archaeological Study. Only those cultural resources on or within the project vicinity are analyzed. ***The note fails to address specific deficiencies identified in Architectural and Cultural review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 10 for additional details.***
Density	Land use densities for the project are based on the project as a whole rather than portions of the site. Potentially significant impacts related to land use are discussed in Section 4.7, *Land Use*. ***The note fails to address the fact that a maximum density is defined in terms of the number of dwelling units per unit area, i.e. du per acre and not dwelling units per net or gross acre.***
Flooding	Drainage and flooding impacts are discussed in the Hydraulic Study (Appendix E) and in the DEIR in Section 4.6, Drainage and Flood Hazards. ***The note fails to address specific deficiencies identified in Drainage review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 11 for additional details.***
Hazards	Phase I and II Site Assessments were completed for the project. Accordingly, the assessment did not recognize the identified hazards noted in the comment as a significant hazard to the project site or surrounding areas. Potentially significant impacts are discussed in Section 4.5, *Hazards*, and are summarized in Appendix F. ***The note fails to address specific deficiencies identified in Hazards & Soils review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 12 for additional details.***

10.34

EIR-2459 Table 1-2 Annotated Summary of Scoping Meeting Comments	
Comment Topic	Notes
Walkability	The "walkability" of a project is not an environmental issue under CEQA. This issue relates to the design of the project. ***The note fails to address specific walkability issues identified in review comments dated 08 April 2008 and 28 Oct 2008. Walkability is an environmental issue as it impacts the areas of transportation, traffic, and greenhouse gases. See Chapters 7, 8, 16 and 17 for a discussion of additional walking issues.***
Public Safety – Emergency Services • Increased response times • Swales	Streets adjacent to the plan area would not be narrowed, but may not widened. ***The note fails to address specific future traffic issues identified in future traffic review comments dated 28 October 2008. See Chapter 7 for additional details.*** Projects must undergo Fire Department plan reviews prior to final approval to ensure that site access is adequate. ***The note fails to address the claim of the violation of the California Fire Code contained in the fire department public safety review comments dated 20 October 2008. See Chapter 9 for additional comments. Failure of the City of Ventura to recognize the violation of the California fire code leads a person to one of the following conclusions: either (1) the fire chief and fire prevention officer are incompetent or incapable oft interpreting the California fire code; or this response has been dictated by the City Manager or the Community Development Director.*** ***See Chapter 9 for additional details.*** The Ventura Police Department has not indicated the potential for inadequate response times. The Initial Study determined emergency service impacts to be less than significant (Appendix A).
Schools and economic impact	The applicant is required to pay school impact fees. The addition of new students to the area schools is analyzed in the Initial Study (Appendix A) and impacts were found to be less than significant. ***The note fails to address the specific schools issues identified in review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 5 for additional details.***
Aesthetics	Potentially significant visual impacts, both project-specific and cumulative, are discussed in Section 4.1, *Aesthetics* The analysis includes impacts upon the adjacent view corridor and from sound walls. ***The note fails to address the specific viewshed and soundwall issues identified in review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 8 for additional details.***
Water Supply	The project includes a Water Supply Assessment (Appendix I). The WSA includes analysis based on the ability of the water provider to supply water to the proposed project under multiple scenarios including multi-year drought conditions. Based on the WSA impacts were determined to be less than significant. ***The note fails to address specific water supply & drought issues identified in review comments dated 08 April 2008 and 28 Oct 2008. See Chapter 6 for additional details.***

10.34

EIR-2459 Table 1-2 Annotated Summary of Scoping Meeting Comments	
Comment Topic	Notes
Economic Impacts	Economic impacts are not an environmental impact that can be classified as significant by CEQA (Section 15064). Infrastructure costs to implement the project are paid for by the applicant/developer. ***The note fails to address specific economic impact issues identified in review comments dated 28 Oct 2008. See Chapters 1 and 2 for a discussion of the CEQA requirements pertaining to economic and social impacts.***
Traffic • Railroad Intersection • SR-118 Intersection • SOAR expiration • Cumulative Growth • Eastbound SR-126 traffic	A Traffic Study was completed for the specific plan that included an analysis of both project generated and cumulative impacts in Appendix H. The traffic analysis studies those intersections that are likely to result in significant impacts as a result of project generated traffic. ***The note fails to address the specific traffic issues identified in review comments dated 28 Oct 2008. See Chapter 7 for additional details*** Other intersections not included in the analysis were determined not to have in significant impacts. Consideration of impacts that may occur once SOAR expires would be speculative. Potentially significant impacts are discussed in Section 4.9, *Traffic*. ***The note fails to address the specific traffic issues identified in review comments dated 28 Oct 2008. See Chapter 7 for additional details. The estimated impact of the future expiration of SOAR on Telegraph and Wells Roads traffic is no more speculative than the estimated impact of proposed residential development on local area traffic contained in the EIR. The estimated impact of the future expiration of SOAR on Telegraph and Wells Roads traffic is sufficiently accurate to demonstrate reduction of the roadway classification from secondary arterial to collector will have an adverse effect on future traffic and circulation.***

10.34

The City of San Buenaventura has failed to respond to requests for public information pertinent to the review of the subject EIR. Those requests being for the latest copy of the Parklands Specific Plan and the Draft Parklands TentatativeTract Map.

During the Parklands EIR Scoping Meeting of 28 Oct 2008, .pdf copies of the latest Parklands Specific Plan and Tentative Tract Map were verbally requested. I was advised to submit the request in writing, for which I responded, I consider this verbal request adequate. None of the requested documents had been received by 07 Dec 2008, even after follow-up messages to the Planner.

On 07 Dec 2008, a request to please provide .pdf copies of the latest Parklands Specific Plan and Tentative Tract Map which are consistent with the Environmental Impact Report SCH # 2008031082 just released for public review was placed on MyVentura Access, Case Number: 49139 dated 07 Dec 2008.

On 11 Dec 2008, an additional note was placed on MyVenturaAccess, Case No. 49139 stating 'this request has not been seen by the Planned, Iain Holt per a telecom this morning'.

On 16 Dec 2008, a note was placed on MyVenturaAccess, Case No. 49139 stating ,Mr. Cormode, Theses documnts are not on file with the City Clerk. I have contacted Iain Holt, Community Development, for his assistance in complying with your request. Fidela Garcia Deputy City Clerk'. 10.34

As a result in failing to respond to the above request for public information, the following violation of the California Public Records Act has occurred:

> Access has not been immediate nor has a decision granting access been prompt.
>
> No unusual case existed such as records being held off-site or consultation with other agencies which would preclude providing the required documents within 10 days.
>
> Records were requested in PDF format which are preclude a requirement for printing.
>
> Copy costs were not an issue since the requested documents could be either e-mail for free or provided on a compact disc for a fee of one dollar.
>
> No justification for withholding the record by demonstrating the record is exempt or the public interest in confidentiality outweighs the public interest in disclosure has been provided.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environmental effects.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

10.35

The EIR does not quantify or identify the cumulative environmental effects of known current and planned or predictable future housing units or population.

The current estimated total planned and future 124,809 population is within 93.7% of the maximum population of 133,160 persons allowed by the 2005 General Plan.

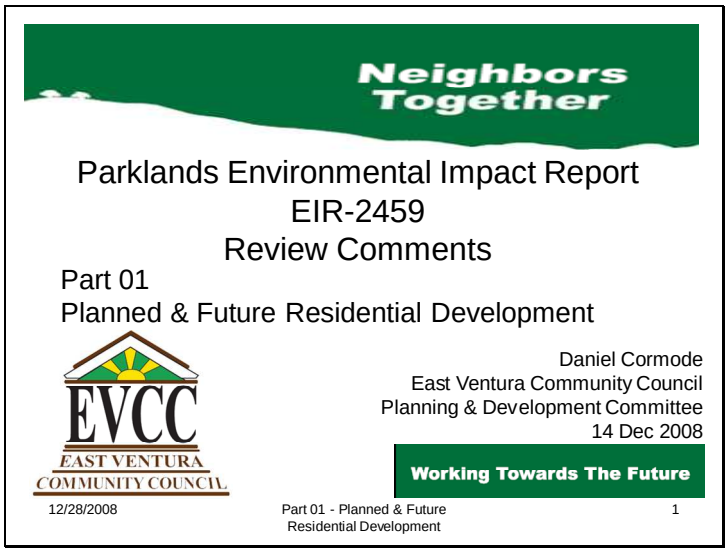
The Wells-Saticoy Community is projected to grow by 272% of its 2000 US Census size. The future population growth from estimated planned and future residential development in 2008 has already accounted for 58% to 77% of the planned 2005-2025[1] population growth.

10.36

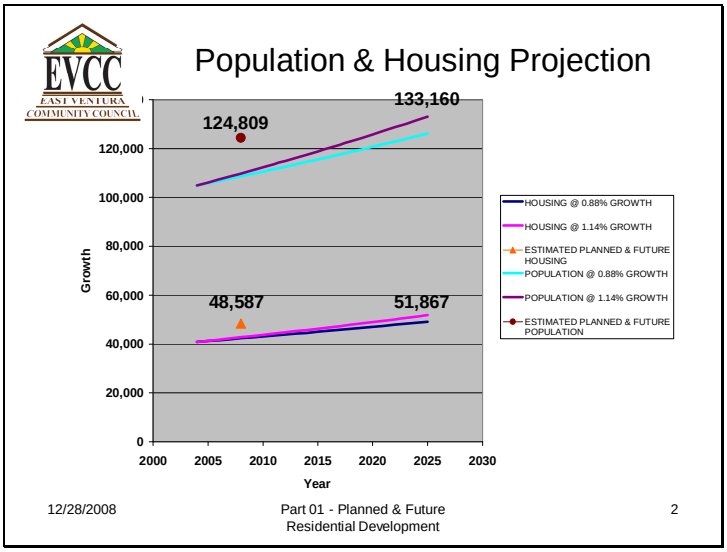
The above statements are substantiated by information contained in the attached slides.

[1] Population & Housing Projections – 2005 General Plan

Slide 1


Neighbors Together
Parklands Environmental Impact Report
EIR-2459
Review Comments
Part 01
Planned & Future Residential Development
EVCC
EAST VENTURA COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
14 Dec 2008
Working Towards The Future
12/28/2008
Part 01 - Planned & Future Residential Development
1

Slide 2

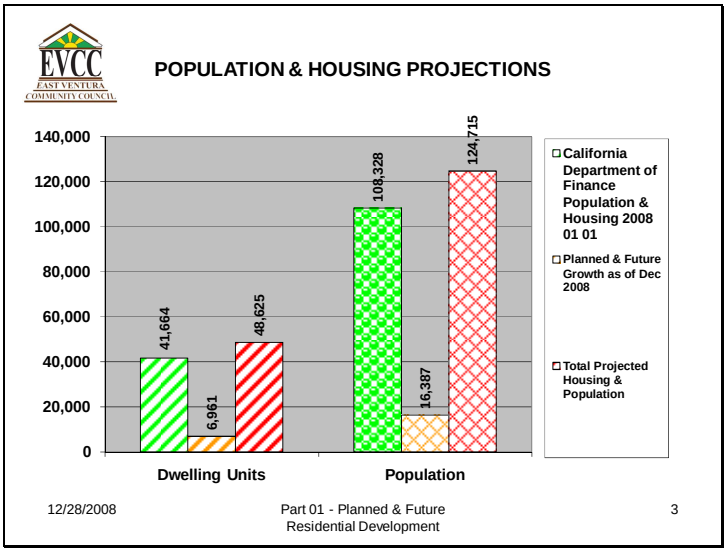


The current estimated total planned and future 124,809 population is within 93.7% of the maximum population of 133,160 persons allowed by the 2005 General Plan.

The current estimated total number of planned and future 48,587 dwelling units is within 93.7% of the maximum number of 51,867 dwelling units allowed by the 2005 General Plan leaving a balance of 3,280 dwelling units allowed to be constructed.[2] 10.36

[2] Ref: Housing Population & Schools 2008 12 13.xls

Slide 3



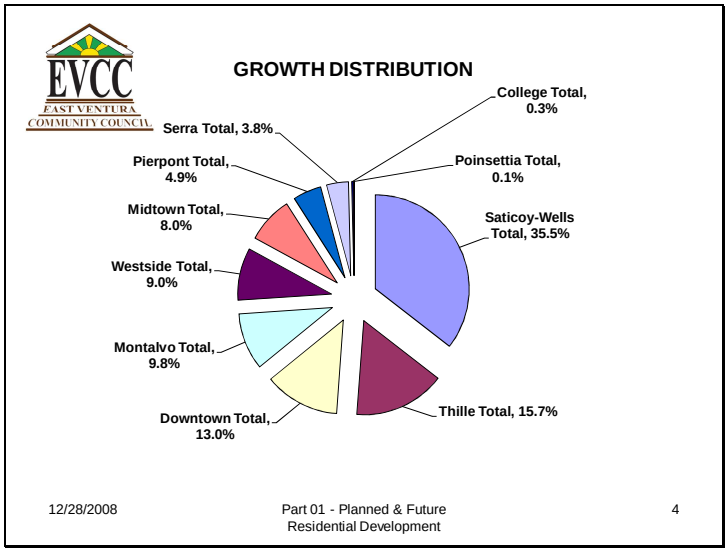
10.36

City of San Buenaventura Housing & Population Projections[3]		
	Housing	Population
CDOF Housing 01/01/2008	41,664	108,328
Planned & Future Growth as of Dec 2008	6,691	16,375
Total Projected Housing	48,625	124,715

The Wells-Saticoy Community is projected to grow by 272% of its 2000 US Census size

[3] Ref: Housing Population & Schools 2008 12 13.xls

Slide 4

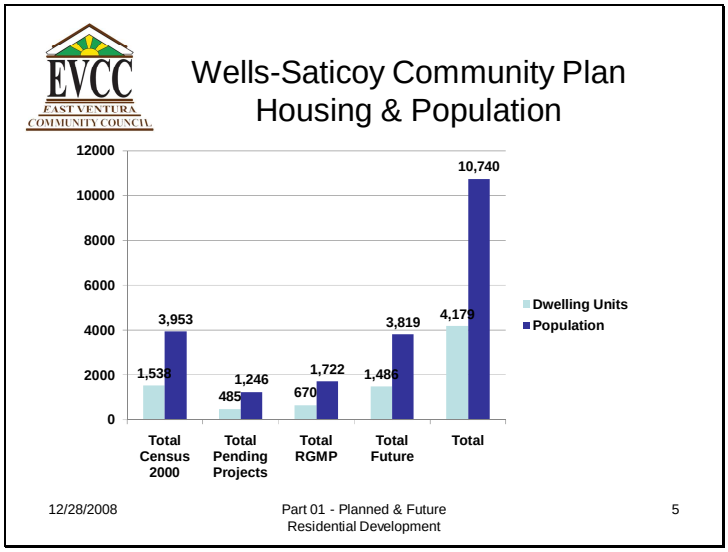


10.36

The Wells-Saticoy Community will be the target of 35% of the planned or possible future residential development projects.[4]

[4] Ref: Housing Population & Schools 2008 12 13.xls

Slide 5



10.36

The Wells-Saticoy Community is projected to grow by 272% of its 2000 .US Census size.[5]

[5] Ref: Housing Population & Schools 2008 12 13.xls

Slide 6

2005 General Plan Population & Housing Projections

Population and Housing Projections

	2004 Levels[a]	2025 Estimates		Change from 2004-2025	
		0.88% Annual Growth	1.14% Annual Growth	0.88% Annual Growth	1.14% Annual Growth
Population	104,952	126,153	133,160	21,201	28,208
Housing Units[b]	40,880	49,138	51,867	8,258	10,987

[a] *Source: California Department of Finance, City/County Population and Housing Estimates, 1/1/2004.*

[b] *Housing unit estimates assume that the current ratio of 2.57 persons per household remains constant through 2025. In reality, the number of persons per unit could go up or down, depending upon housing costs, the types of housing built in the City, population growth, and other factors.*

12/28/2008 Part 01 - Planned & Future Residential Development 6

10.36

The future population growth from estimated planned and future residential development in 2008 has already accounted for 58% to 77% of the planned 2005-2025[6] population growth.

[6] Population & Housing Projections – 2005 General Plan

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.37

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environmental, economic and social concerns.

Even though payment of fees is considered mitigation of environmental impacts, that does not excuse failure to discuss project specific and cumulative environmental, economic or social impacts.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development nor of the cumulative impact of proposed residential developments on schools.

Developers contribute to **64.8%** of the cost of new schools by paying developer fees with the balance funded by the school district.

The total seat cost for 6,961 units of a 2,500 square foot dwelling unit residential development is estimated to be $57,428,250 with only $37,241,350 collected in developer fees leaving the school district and taxpayer to pay **$20,186,900.** 10.38

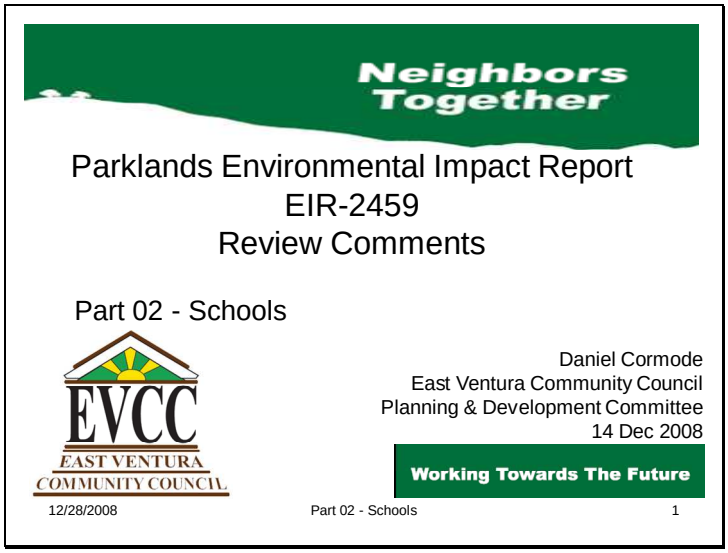
The development of 6,961dwelling units will cause the student load at Saticoy School to exceed the maximum utilization by over 92% and Lincoln School to exceed the maximum utilization by over 69%.

The development of 6,961dwelling units will cause the student load at Anacapa and Balboa Middle Schools to exceed the maximum utilization. The development of 6,961 dwelling units will cause the student load at Buena High School to exceed the maximum utilization by over 8% and Ventura High School by 2%.

The School Site Selection was incomplete and was not consistent with the California Department of Education Site Selection Criteria.

The above statements are substantiated by information contained in the attached slides.

Slide 1



Incorporate discussion and quantify economic, environmental and social project specific and cumulative factors based on scientific and factual data in order to determine the magnitude of the impact of the proposed Residential development on the subject area of concern as required by Title 14, California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act. 10.38

While impacts on schools may be mitigated by payment of fees, payment of fees is not a substitute for discussion and quantification of the project impacts

Slide 2

Schools

- Schools Cost & Utilization
- East Ventura School Site Selection Study
- California Department of Education
  Site Selection Criteria

12/28/2008 Part 02 - Schools 2

Slide 3

Schools Cost & Utilization

- Seat Cost & Developer Fees
- Revenue From Residential Impact Fee for Housing New Students
- Elementary School Utilization
- Middle School Utilization
- High School Utilization

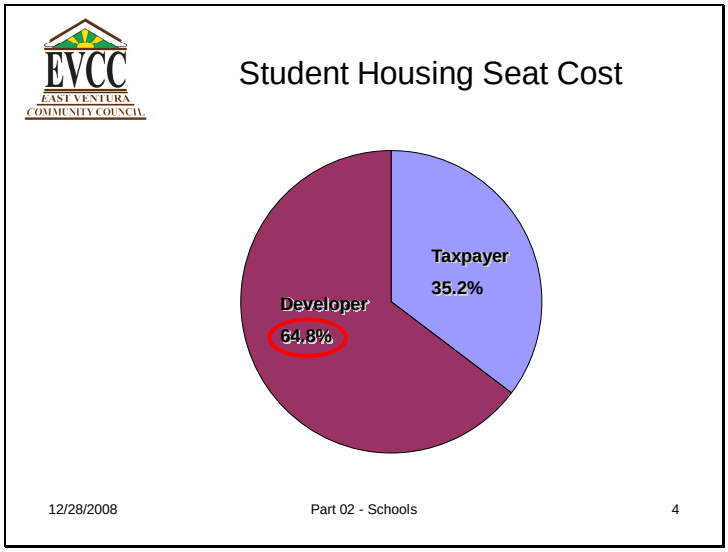
12/28/2008 Part 02 - Schools 3

10.38

Schools Cost & Utilization

Seat Cost & Developer Fees
Revenue From Residential Impact Fee for Housing New Students
Elementary School Utilization
Middle School Utilization
High School Utilization

Slide 4



10.38

Student Housing Seat Cost.

Developers contribute to **64.8%** of the cost of new schools by paying developer fees with the balance funded by the school district.

Slide 5

Revenue From Residential Impact Fee for Housing New Students

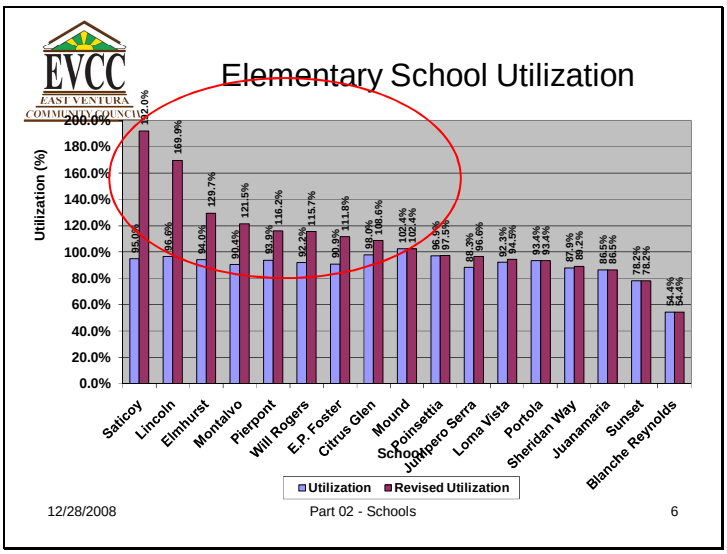
New Housing (DU)	6,961	6,961
Dwelling Unit Size (sf)	2,500	2,500
Revenue of Cost Per DU ($/sf)	$2.14	$3.30
Total	$37,241,350	$57,428,250
Subsidized Cost		$20,186,900

12/28/2008 Part 02 - Schools 5

10.38

The total seat cost for 6,961 units of a 2,500 square foot dwelling unit residential development is estimated to be $57,428,250 with only $37,241,350 collected in developer fees leaving the school district and taxpayer to pay **$20,186,900.**

Slide 6

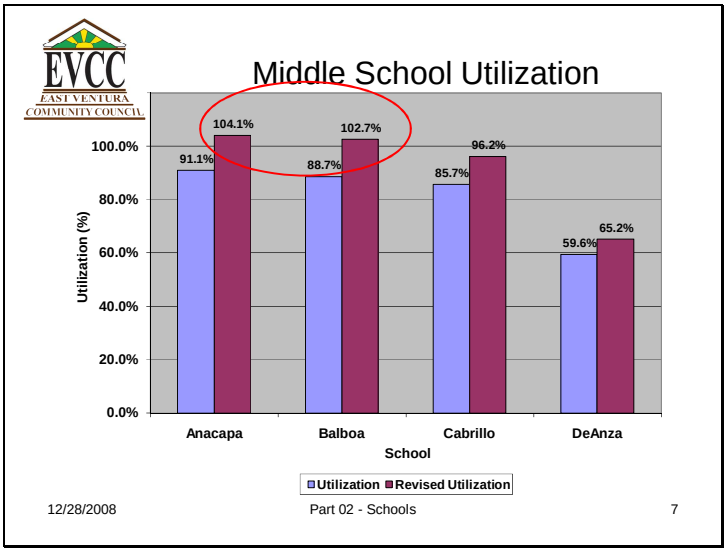


10.38

The development of 6,961dwelling units will cause the student load at Saticoy School to exceed the maximum utilization by over 92% and Lincoln School to exceed the maximum utilization by over 69%.[1] Maximum utilization will also be exceeded at Elmhurst, Montalvo, Pierpont, Will Rogers, E.P. Foster, Citrus Glen and Mound Schools.

[1] Ref: Housing, Population & Schools 2008 12 13.xls

Slide 7

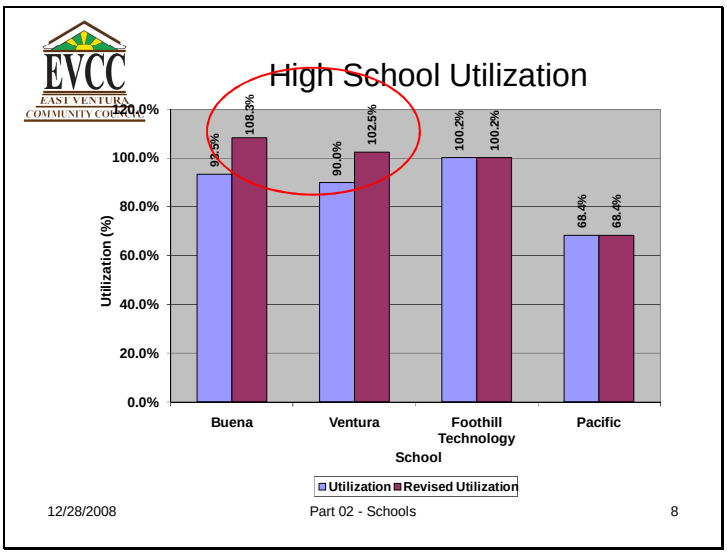


10.38

The development of 6,961dwelling units will cause the student load at Anacapa and Balboa Middle Schools to exceed the maximum utilization.[2]

[2] Ref: Housing, Population & Schools 2008 12 13.xls

Slide 8

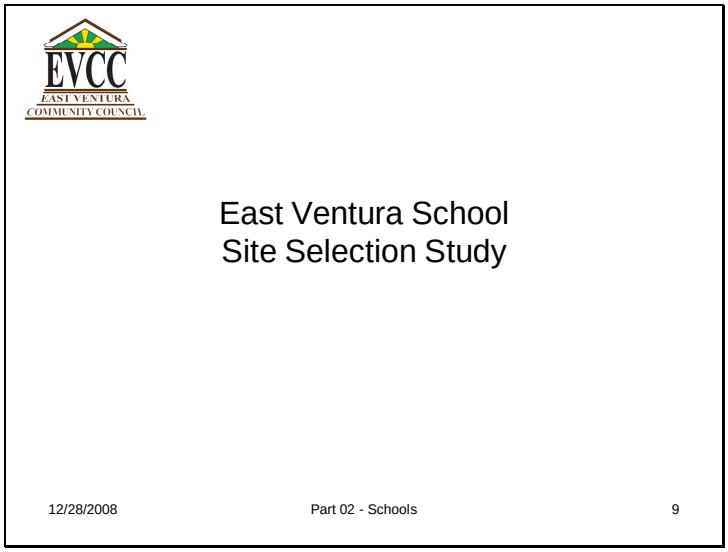


10.38

The development of 6,961 dwelling units will cause the student load at Buena High School to exceed the maximum utilization by over 8% and Ventura High School by 2%[3].

[3] Ref: Housing, Population & Schools 2008 12 13.xls

Slide 9



East Ventura School
Site Selection Study

Slide 10

East Ventura School Site Selection Study

- Future Residential Development Sites Not Included.
- Possible School Sites Incomplete.
- Walkability
- Pedestrian Safety
- Dam Inundation Areas
- Expansive Soil Areas
- FEMA Flood Zone Areas
- Future Noise Contours

12/28/2008 Part 02 - Schools 10

10.38

Slide 11

Schools - Outline

- Intersection Capacity Utilization - 2025
- Lands In Ag Use
- Liquifaction Areas
- Major Fault Areas
- Parks & Recreation Facilities
- Roadway Classifications
- Sewage Facilities
- SOAR & LCA Contracts
- Existing Drainage Facilities Deficiencies
- Prevailing Wind & Pollution/Odors from Cal Wood Recycling East of Saticoy

12/28/2008 Part 02 - Schools 11

10.38

Slide 12

Schools - Outline

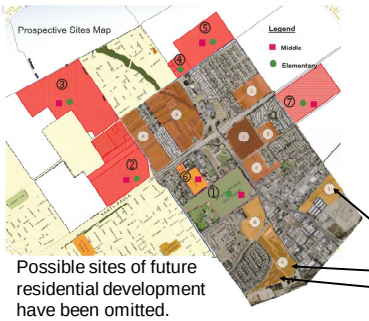
- Student Housing Seat Cost Distribution
- Estimated Cost.
- Elementary School Utilization Increase
- Middle School Utilization Increase
- High School Utilization Increase

12/28/2008 Part 02 - Schools 12

10.38

Slide 13

Incomplete East End Site Selection Evaluation Report – Future Residential Development Sites



Possible sites of future residential development have been omitted.

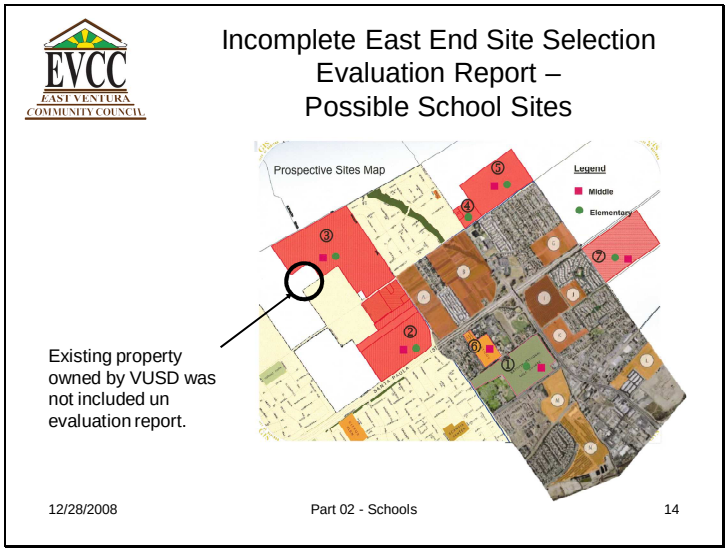
	Dwelling Units	Elementary School	Middle School	High School	Total
Generation Rate		0.2	0.1	0.1	0.4
Las Brisas	165	36.3	14.9	18.2	69.4
Paseo Barranca	152	33.4	13.7	16.7	63.8
Enclave	95	20.9	8.6	10.5	39.0
Total	412	90.6	37.2	45.4	173.2

12/28/2008 Part 02 - Schools 13

10.38

East End Site Selection Evaluation Report is incomplete.
Future Residential Development Sites in Wells-Saticoy Community have been omitted

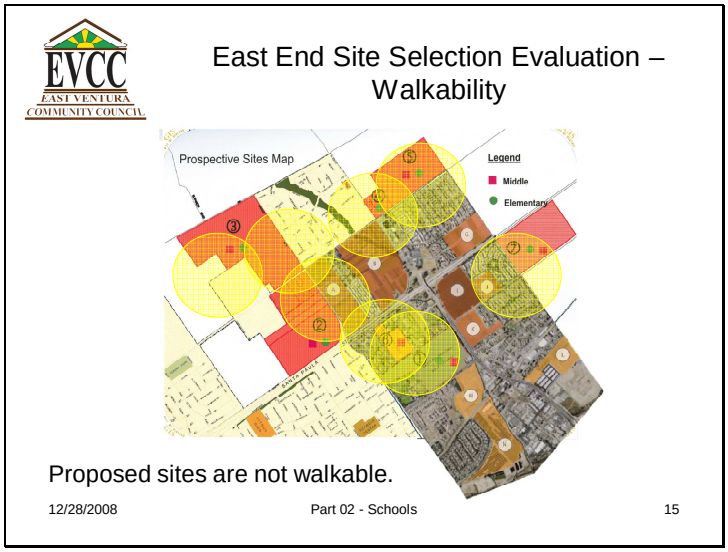
Slide 14



10.38

East End Site Selection Evaluation Report is incomplete.
Property currently owned by the Ventura Unified School District has not included for analysis.

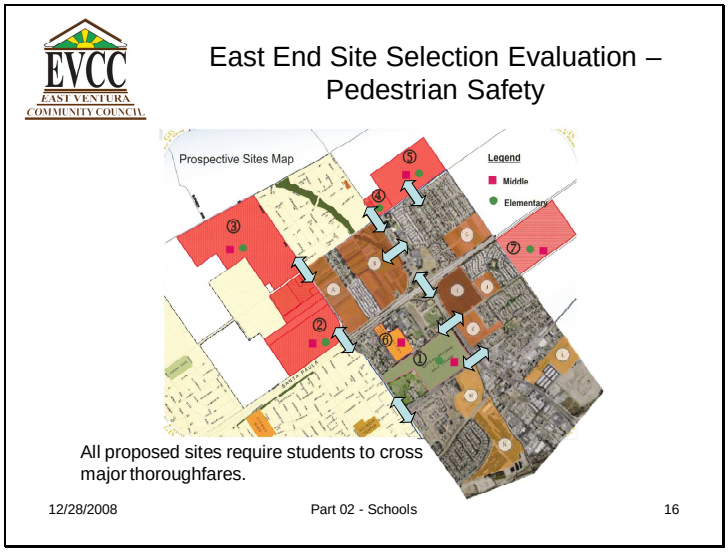
Slide 15



10.38

Proposed sites are not located within a ¼ mile radius of student's places of residence.

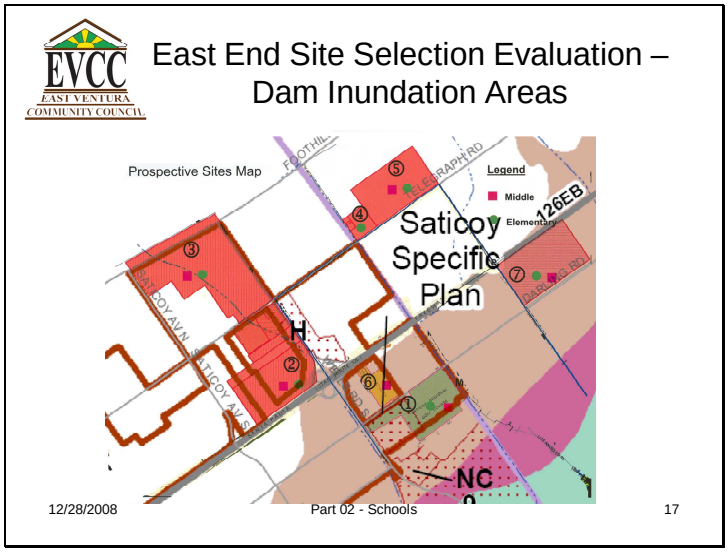
Slide 16



10.38

All proposed sites require students to cross major thoroughfares.

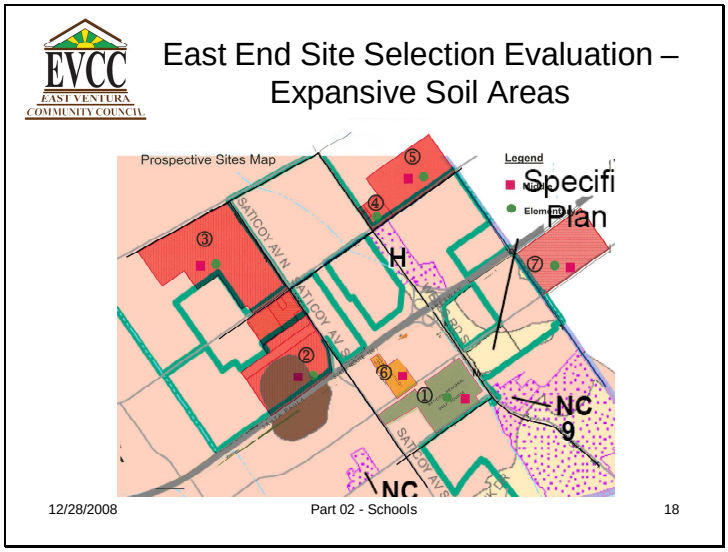
Slide 17



10.38

East End Site Selection Evaluation does not identify Dam Inundation Areas which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report.

Slide 18



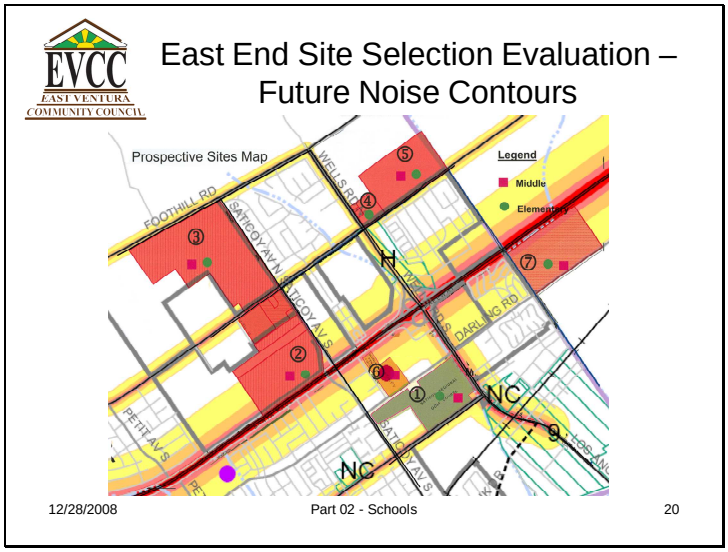
10.38

East End Site Selection Evaluation does not identify Expansive Soil Areas which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report.

Slide 19

East End Site Selection Evaluation does not identify FEMA Flood Zone Areas which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report. 10.38

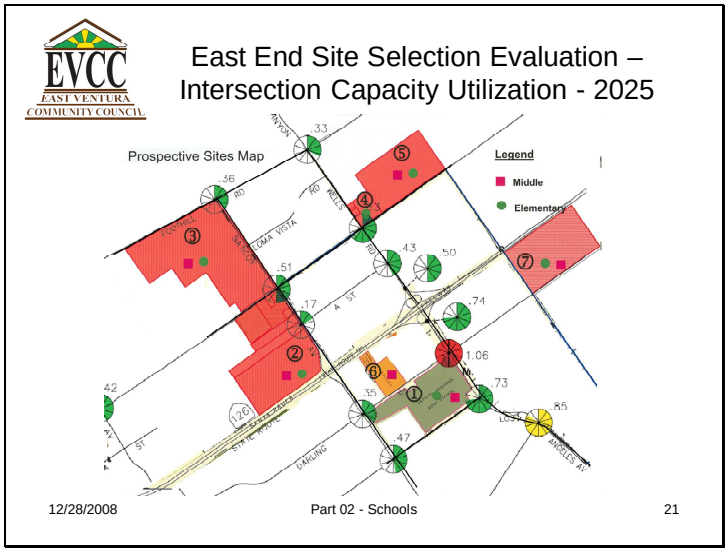
Slide 20



10.38

East End Site Selection Evaluation does not identify Future Noise Contours which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report.

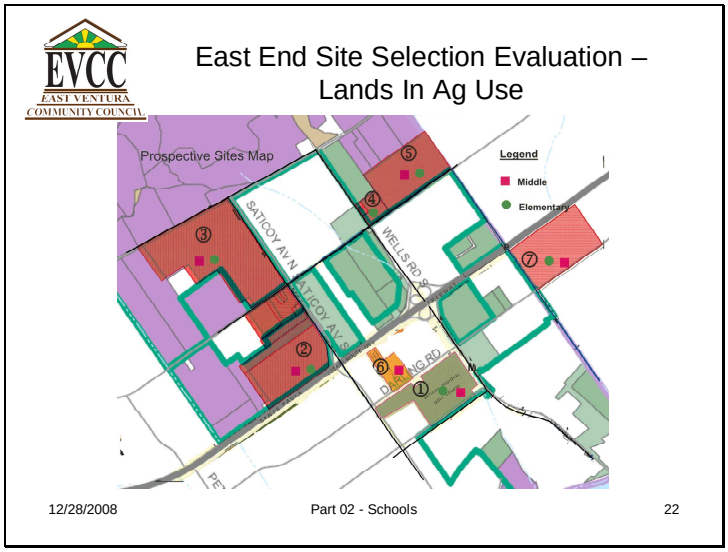
Slide 21



10.38

East End Site Selection Evaluation does not identify future 2025 Intersection Capacity Utilization which was which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

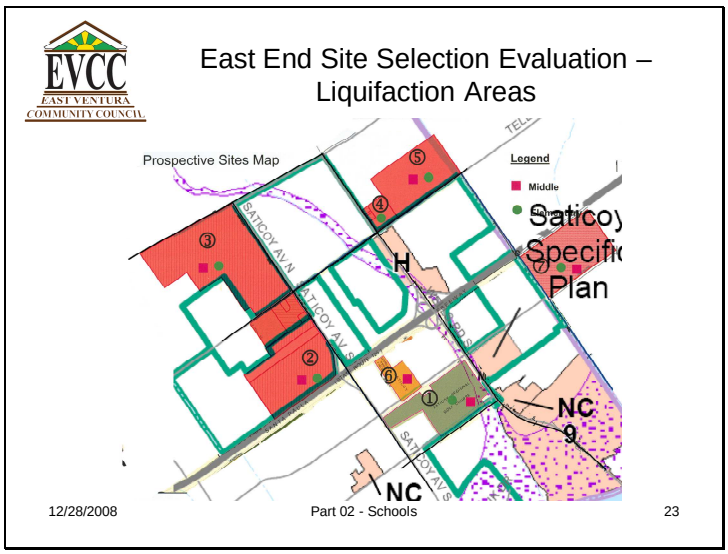
Slide 22



10.38

East End Site Selection Evaluation does not identify Lands in AG Use which was which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

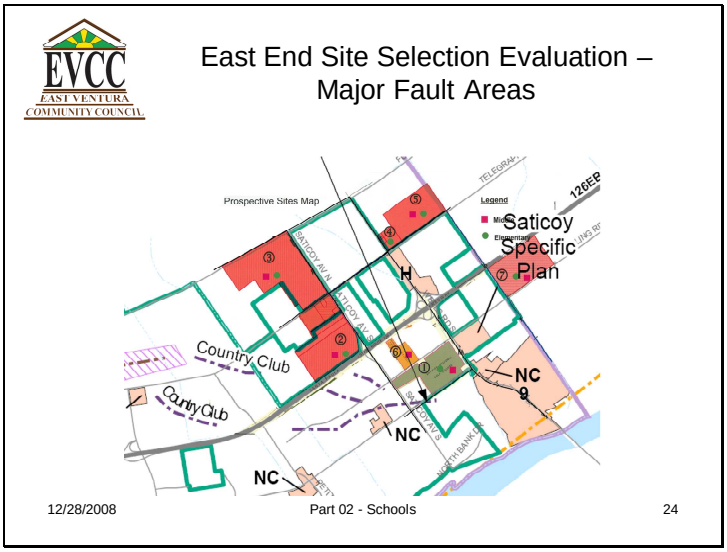
Slide 23



10.38

East End Site Selection Evaluation does not identify Liquifaction Areas which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

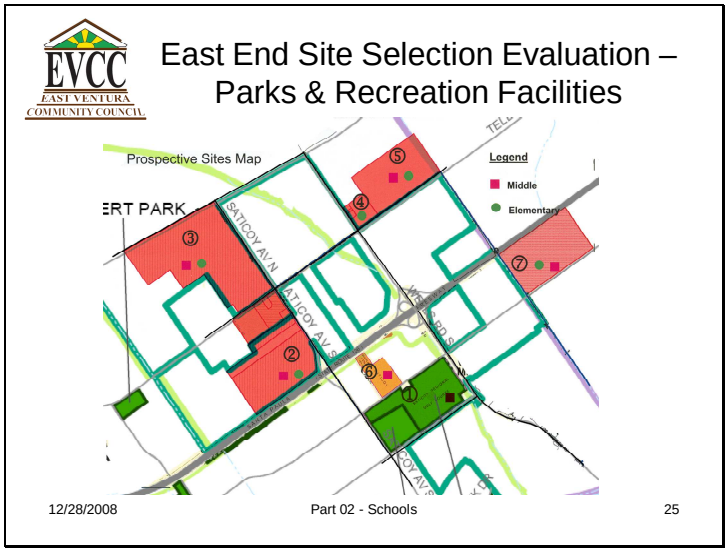
Slide 24



10.38

East End Site Selection Evaluation does not identify Major Fault Areas which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

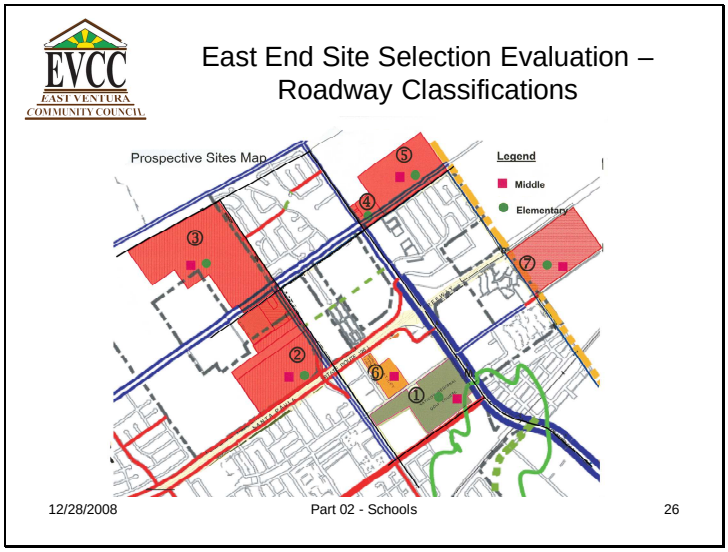
Slide 25



10.38

East End Site Selection Evaluation does not identify Parks & Recreation Facilities which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

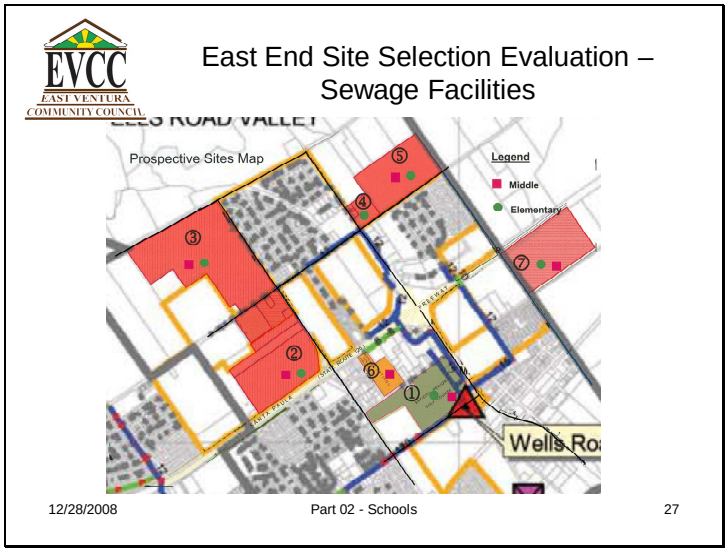
Slide 26



10.38

East End Site Selection Evaluation does not identify Roadway Classifications which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

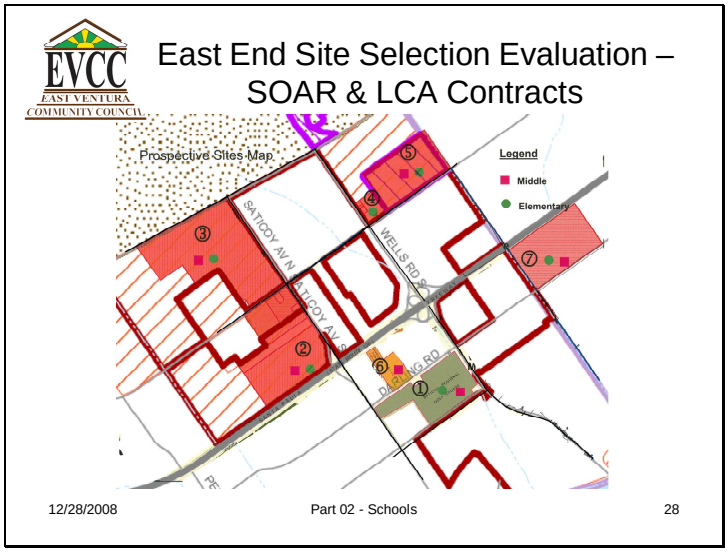
Slide 27



10.38

East End Site Selection Evaluation does not identify Sewage Facilities which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

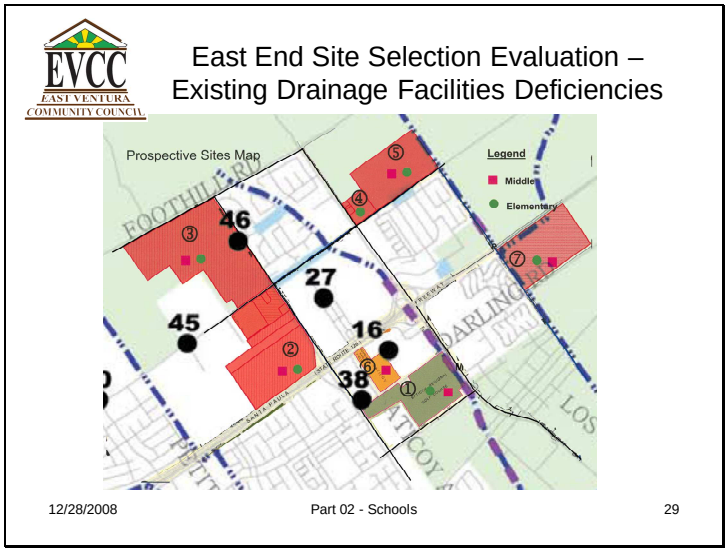
Slide 28



10.38

East End Site Selection Evaluation does not identify SOAR & LCA Contracts which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

Slide 29

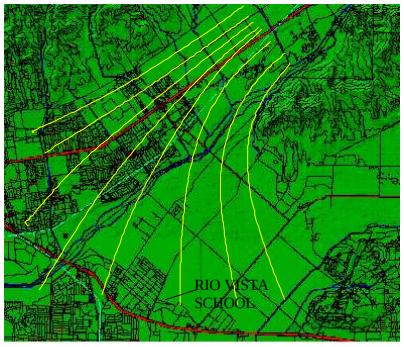


10.38

East End Site Selection Evaluation does not identify Existing Drainage Facilities Deficiencies which were which were reported in the City of San Buenaventura General Plan Final Environmental Impact Report

Slide 30

East End Site Selection Evaluation – Prevailing Wind & Pollution/Odors from Cal Wood Recycling East of Saticoy



12/28/2008 30

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East End Site Selection Evaluation does not identify Prevailing Wind & Pollution/Odors from Cal Wood Recycling East of Saticoy.

Slide 31

EVCC
EAST VENTURA
COMMUNITY COUNCIL

California Department of Education
Site Selection Criteria

12/28/2008 Part 02 - Schools 31

Slide 32

California Department of Education Site Selection Criteria Outline

- California Department of Education Site Selection Criteria
  - **Safety**
  - **Location**
  - **Environment**
  - **Soils**
  - **Topography**
  - **Size & Shape**
  - **Accessibility**
  - **Public Services**
  - **Utilities**
  - **Cost**
  - **Availability**
  - **Public Acceptance**

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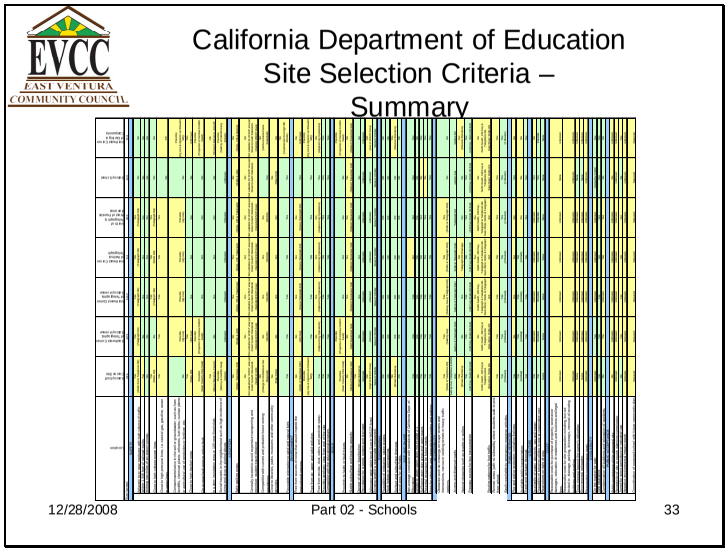
Slide 33



This sheet is a summary of the California Department of Education Site Selection Criteria prepared for consistency the aforementioned Environmental Impact Report data.

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Slide 34

EVCC
EAST VENTURA
COMMUNITY COUNCIL

California Department of Education Site Selection Criteria – Safety

SAFETY							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Wells & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Wells & Campanola
Size (acres)	48.5	92.5	114	9.3	49.45	13.95	73.9
Adjacent to or near roadways with high volume of traffic	Yes (Wells Rd & Telephone Rd)	Yes (Telegraph Rd)	Yes (Telegraph Rd)	Yes (Telegraph Rd)	Yes (Telegraph Rd)	No	No
Within 1,500 feet of railroad tracks.	Yes	No	No	No	No	No	No
Withing two miles of an airport runway.	No	No	No	No	No	No	No
Close to high voltage power lines.	Yes (Wells Rd)	No	Yes (Telegraph Rd)	Yes (Wells Rd)	Yes (Telegraph Rd)	No	No
Close to high pressure lines, i.e. natural gas, gasoline, sewer or water lines.	Yes	Yes	Yes	Yes	Yes	No	PP
Contaminants/toxics in the soil or groundwater, such as from landfills, chemical plants, refineries, fuel tanks, nuclear plants, or agricultural use of pesticides or fertilizer, etc.	No	Possible (Ag Use)	Possible (Ag Use)	Possible (Ag Use)	Possible (Ag Use)	No	Possible (Ag Use & Agromin on Edwards Rd)
Close to high decibel noise.	Yes (Wells Rd)	Yes (126 Fwy)	No	No	No	No	Yes (126 Fwy)
On or near fault zone or active fault.	Possible (Near Country Club Fault)	Possible (Projection of Ventura Foothill Fault)	No	No	No	No	Possible (Projection of Ventura Foothill Fault)
In a dam inundation area or 100-year flood plain.	Yes (Brown Barranca, Zone A)	No	No	No	No	No	OK (Vaseon Barranca, Zone B)
Social hazards in the neighborhood such as high incidence of crime and drug or alcohol abuse.	Possible (Saticoy & Cabrillo Gang Activity)	Unknown	Unknown	Unknown	Unknown	Unknown	Possible (Saticoy & Cabrillo Gang Activity)

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10.38

California Department of Education Site Selection Criteria – Location

LOCATION							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southeast Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Campanula
Safe walking areas	No (Wells, Telephone 126)	No (Wells & 126)	No (Wells, 126 & Telephone)	No (Wells, 126, Telegraph)	No (Wells, 126 & Telegraph)	No (Wells & 126)	No (Wells, 126 & Daring)
Centrally located to avoid expensive transporting and minimize student travel distance	No Not walkable for WSCP area per Smart Growth Standards (South of 126)	No Not walkable for WSCP area per Smart Growth Standards (Outside WSCP Area)	No Not walkable for WSCP area per Smart Growth Standards (Outside WSCP Area)	No Not walkable for WSCP area per Smart Growth Standards (Outside WSCP Area)	No Not walkable for WSCP area per Smart Growth Standards (Outside WSCP Area)	No Not walkable for WSCP area per Smart Growth Standards	No Not walkable for WSCP area per Smart Growth Standards (Outside WSCP Area)
Compatible with current and probable future zoning regulations.	No (Change to Institutional Use Required)	No (SOAR)	No (SOAR)	No (SOAR)	No (SOAR)	Yes	No (Ventura Santa Paula Greenbelt)
Close to libraries, parks, museums and other community services.	No (Park Only))	No	No	No	No	No (Park Only)	No
Favorable orientation to wind and natural light.	Yes	Yes	Yes	Yes	Yes	Yes	No (Unprotected from high NE Winds)

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Slide 36

California Department of Education Site Selection Criteria – Environment

ENVIRONMENT							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Wagon & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Earranca	Saticoy School	Northeast Corner of Darling & Campanula
Free from sources of noise that would impede the instructional process.	No (Wells & Telephone Rds)	No (126 Fwy)	No (Future Telegraph Rd)	No (Future Telegraph Rd)	No (Future Telegraph Rd)	Yes	No (126 Fwy)
Free from air, water and solid pollution.	Possible (Ag Use & Agromin on Edwards Rd))	Yes	Yes	Yes	Yes	Yes	Possible (Ag Use & Agromin on Edwards Rd))
Free from smoke, dust, odors, and pesticide spray.	Yes	No (Adjacent Ag Operations)	No (Adjacent Ag Operations)	No (Adjacent Ag Operations)	No (Adjacent Ag Operations)	Yes	No (Adjacent Ag Operations)
Provides aesthetic view from and of the site.	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Compatible with the educational program.	Yes	Yes	Yes	Yes	Yes	Yes	Yes

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10.38

Slide 37

California Department of Education Site Selection Criteria – Soils

SOILS							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Rose & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Camarillo
Proximity to faults or fault traces.	Possible (Near Country Club Fault)	Possible (Projection of Ventura Foothill Fault)	No	No	No	No	Possible (Projection of Ventura Foothill Fault)
Stable subsurface and bearing capacity.	No (Medium Expansive Soil)	No (High Expansive Soil)	No (Medium Expansive Soil)	No (Medium Expansive Soil)	No (Medium Expansive Soil)	No (Medium Expansive Soil)	No (Medium Expansive Soil)
Danger of slides or liquefaction.	Yes (Brown Barranca)	No	No	No	No	No	No
Percolation for a septic system and drainage.	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Adequate water table level. (Low in WSCP Area)	OK (High in WSCP Area)	Unknown	Unknown	Unknown	Unknown	Unknown	OK (Low in WSCP Area)
Existing landfill is reasonable compacted.	None in Vicinity	None in Vicinity	None in Vicinity	None in Vicinity	None in Vicinity	None in Vicinity	None in Vicinity

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10.38

Slide 38

California Department of Education Site Selection Criteria – Topography

TOPOGRAPHY							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Campanola
Feasibility of mitigating steep grades.	OK	OK	OK	OK	OK	OK	OK
Rock ledges or outcroppings.	OK	OK	OK	OK	OK	OK	OK
Surface and subsurface drainage	No (Brown Barranca)	OK	OK	OK	PP	OK	PP
Level area for playfields.	OK	OK	OK	OK	OK	OK	OK

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10.38

Slide 39

California Department of Education Site Selection Criteria – Size & Shape

SIZE AND SHAPE							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Campanella
Net acreage consistent with standards of California Dept. of Education	Yes	Yes	Yes	No	Yes	Yes	Yes
Length to width ration does not exceed 2:1	OK	OK	OK	OK	OK	OK	OK
Sufficient open play areas and open space.	Yes	Yes	Yes	Yes	Yes	No	Yes
Potential expansion for future needs.	Yes	Yes	Yes	No	Yes	No	Yes
Area for adequate and separate bus loading and parking.	Yes	Yes	Yes	Yes	Yes	Yes	Yes

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10.38

Slide 40

EVCC
EAST VENTURA COMMUNITY COUNCIL

California Department of Education Site Selection Criteria – Accessibility

ACCESSIBILITY							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Dulling & Campanella
Obstacles such as crossings on major streets and intersections, narrow or winding streets or heavy traffic patterns.	Yes (Wells & Telephone Rd)	Yes (Saticoy Ave)	Yes (Saticoy Ave & Telegraph Rd)	Yes (Wells & Telegraph Rds)	Yes (Wells & Telegraph Rds)	No	No
Access and dispersal roads.	Saticoy Ave, Telephone & Wells Rds	Saticoy & Telegraph Rds)	Saticoy & Telegraph Rds)	Wells & Telegraph Rds)	Telegraph Rd	Jaznin Ave	Darling Rd
Natural obstacles such as grades or gullies.	Yes (Brown Barranca)	No	No	Yes Telegraph Rd Drainage	No	No	Yes (Wasson Barranca)
Freeway access for bus transportation	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)	Yes (126 Fwy, Wells Rd Exit)
Routing patterns for foot traffic.	No North-South, 126 Fwy & Telephone Rd. East-West, Wells Rd	No North-South, 126 Fwy & Telephone Rd. East-West, Wells Rd	No North-South, 126 Fwy , Telegraph & Telephone Rd. East-West, Wells & Telegraph Rd	No North-South, 126 Fwy , Telegraph & Telephone Rd. East-West, Wells & Telegraph Rd	No North-South, 126 Fwy , Telegraph & Telephone Rd. East-West, Wells & Telegraph Rd	No North-South, 126 Fwy & Telephone Rd. East-West, Wells Rd	No North-South, 126 Fwy & Telephone Rd. East-West, Wells Rd
Remote areas (with no sidewalks) where students walk to and from school.	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Easily reachable by emergency response vehicles.	Yes (2 Routes)	Yes (2 Routes)	Yes (2 Routes)	Yes (2 Routes)	Yes (1 Routes)	Yes (1 Routes)	Yes (1 Routes)

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10.38

Slide 41

California Department of Education Site Selection Criteria – Public Services

PUBLIC SERVICES							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Rivera & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Carling & Campanila
Fire and police protection, including firelines.	Yes	No	No	No	No	Yes	No
Available public transportation.	Yes (Limited)	Yes (Limited)	Yes (Limited)	Yes (Limited)	No	No	No
Trash and garbage disposal.	Yes	Yes	Yes	Yes	Yes	Yes	Yes

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10.38

Slide 42

California Department of Education Site Selection Criteria – Utilities

UTILITIES							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Camarinda
Availabilty of water, electricity, gas and sewer.	Yes	Unknown	Unknown	Unknown	Unknown	Yes	No
Feasibility of bringing utilities to site at reasonable cost.	Yes	Possible	Possible	Possible	Possible	Yes	Possible
Restrictions on right of way	None	None	None	None	None	None	None

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10.38

Slide 43

California Department of Education Site Selection Criteria – Cost

COST							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph.	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Dalling & Campanile
Reasonable costs for purchase of property, severance damages, relocation of residences and business and legal fees.	Unknown	Unknown	Unknown	Unknown	Unknown	None	Unknown
Reasonalbe costs for site preparation including, but not limited to drainage, parking, driveways, removal of existing buildings and grading.	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Toxic cleanup beyond the owner's obligation.	None	Unknown	Unknown	Unknown	Unknown	None	Unknown
Enviromental mitigation.	None	Unknown	Unknown	Unknown	Unknown	None	Unknown
Reasonable maintenance costs.	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

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10.38

Slide 44

California Department of Education Site Selection Criteria – Availability

AVAILABILITY							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Camarinda
On the market for sale.	Unknown	Yes	Unknown	Unknown	Unknown	Owned by VUSD	Yes
Title clearance	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Condemnation off buildings and relocation of residents.	No	Yes	Unknown	Yes	Yes	No	No

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10.38

Slide 45

California Department of Education Site Selection Criteria – Public Acceptance

PUBLIC ACCEPTANCE							
Site	1	2	3	4	5	6	7
Location	Saticoy Golf Course Site	Southwest Corner of Telegraph & Saticoy Avenue	Northwest Corner of Telegraph & Saticoy Avenue	Northeast Corner of Wells & Telegraph	North of Telegraph & West of Franklin Barranca	Saticoy School	Northeast Corner of Darling & Campanula
Public acceptance of the proposed site	No	Unknown	Unknown	Unknown	Unknown	No	Unknown
Receptivity of city or county planning commission.	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Zoned for prime agriculture or industrial use.	No	Yes	Yes	Yes	Yes	No	Yes
Negative environmental impact report.	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Cooordination of proposed school with future community plan.	Required	Required	Required	Required	Required	Required	Required

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10.38

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.39

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

The City of San Buenaventura 2005 General Plan Environmental Impact Report (EIR) fails to address the susceptibility of the water supply to drought conditions.

The EIR fails to comply with CEQA and Supreme Court principles for conducting water supply analysis. Sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need over a long term and under conditions of drought are not presented.

Drought intensity, duration or safe/expected yields of rivers, lakes and aquifers under drought conditions are not discussed or quantified. 10.40

Tthe environmental impacts to rivers, lakes and aquifers of providing water to the entire project under drought conditions is not discussed or quantified.

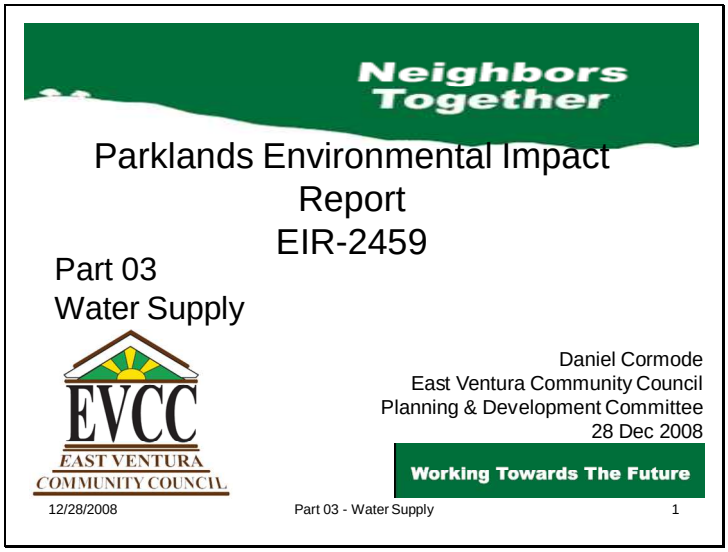
The EIR does not address the impacts of likely loss of future water sources does not include a reasoned analysis of the circumstances affecting the likelihood of the water's availability such as a prolonged drought.

Discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies under drought conditions are not discussed or quantified.

No degree of confidence is demonstrated of the ability of the current water supply to meet future requirements.

The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
Parklands Environmental Impact Report
EIR-2459
Part 03
Water Supply
EVCC
EAST VENTURA COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
28 Dec 2008
Working Towards The Future
12/28/2008
Part 03 - Water Supply
1

Slide 2

Environmental Impact Report – Water Supply

- 2005 General Plan EIR
- Analysis was not performed for drought conditions.
- CEQA and Supreme Court Principles
- EIR Deficiencies
- Demand Exceeds Capacity
- Seawater Intrusion
- Aquifer Depletion
- Lake Casitas Depletion
- State Water Availability
- Desalination
- Water Bill Impact
- Flawed Water Supply Impact Estimates.

12/28/2008 Part 03 - Water Supply 2

10.40

Environmental Impact Report– Water Supply

2005 General Plan EIR
Analysis was not performed for drought conditions.
CEQA and Supreme Court Principles
EIR Deficiencies
Demand Exceeds Capacity
Seawater Intrusion
Aquifer Depletion
Lake Casitas Depletion
State Water Availability
Desalination
Water Bill Impact
Flawed Water Supply Impact Estimates.

Slide 3

Water Supply – The City of San Buenaventura 2005 General Plan EIR

- The City of San Buenaventura 2005 General Plan Environmental Impact Report (EIR) fails to address the susceptibility of the water supply to drought conditions.
  - The EIR states "….estimated water supply levels under **normal non-drought conditions**. Actual water supply water levels may be significantly higher or lower than these averages".
  - The **environmental conditions have changed** since the City of San Buenaventura 2005 General Plan Environmental Impact Report (EIR) was approved.

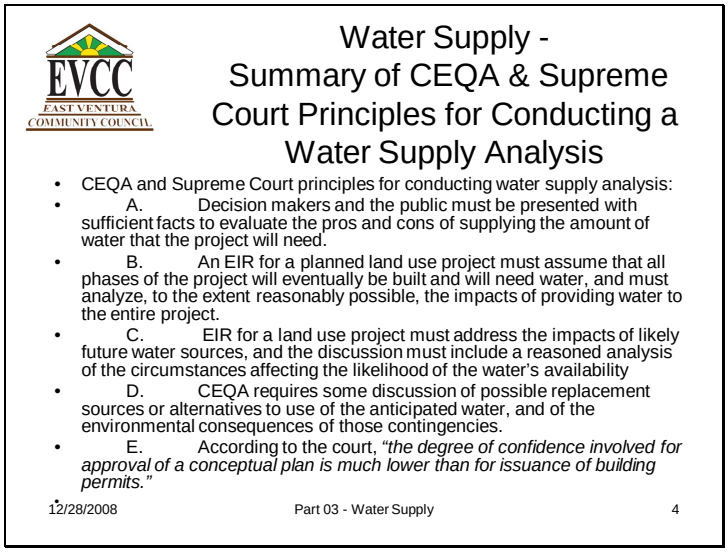
12/28/2008 Part 03 - Water Supply 3

10.40

The City of San Buenaventura 2005 General Plan Environmental Impact Report (EIR) fails to address the susceptibility of the water supply to drought conditions.

The EIR states "….estimated water supply levels under normal under normal non-drought conditions. Actual water supply water levels may be significantly higher or lower than these averages".

Slide 4



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CEQA and Supreme Court principles for conducting water supply analysis:

A. Decision makers and the public must be presented with sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need.

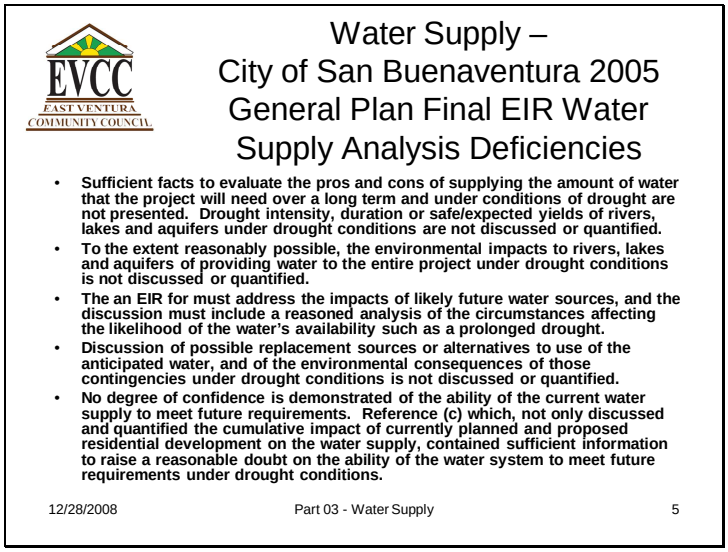
B. An EIR for a planned land use project must assume that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the entire project.

C. EIR for a land use project must address the impacts of likely future water sources, and the discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability

D. CEQA requires some discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies.

E. According to the court, *"the degree of confidence involved for approval of a conceptual plan is much lower than for issuance of building permits."*

Slide 5



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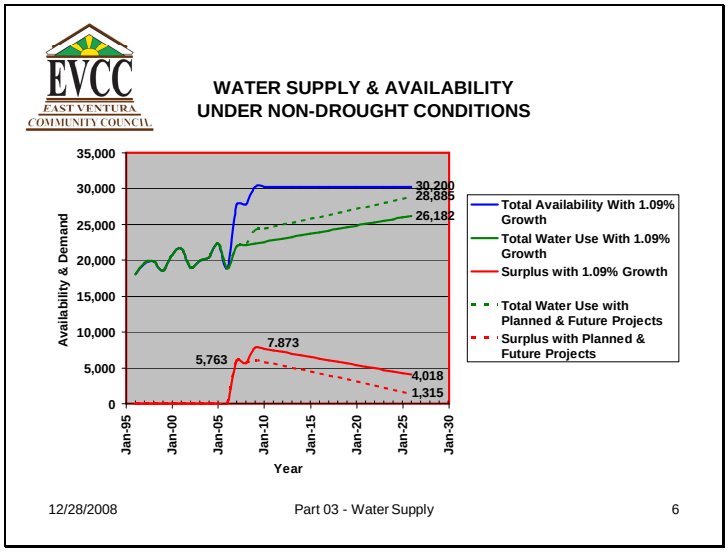
Sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need over a long term and under conditions of drought are not presented. Drought intensity, duration or safe/expected yields of rivers, lakes and aquifers under drought conditions are not discussed or quantified.
To the extent reasonably possible, the environmental impacts to rivers, lakes and aquifers of providing water to the entire project under drought conditions is not discussed or quantified.
An EIR must address the impacts of likely future water sources, and the discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability such as a prolonged drought.
Discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies under drought conditions is not discussed or quantified.
No degree of confidence is demonstrated of the ability of the current water supply to meet future requirements. Reference (c) which, not only discussed and quantified the cumulative impact of currently planned and proposed residential development on the water supply, contained sufficient information to raise a reasonable doubt on the ability of the water system to meet future requirements under drought conditions.

Slide 6



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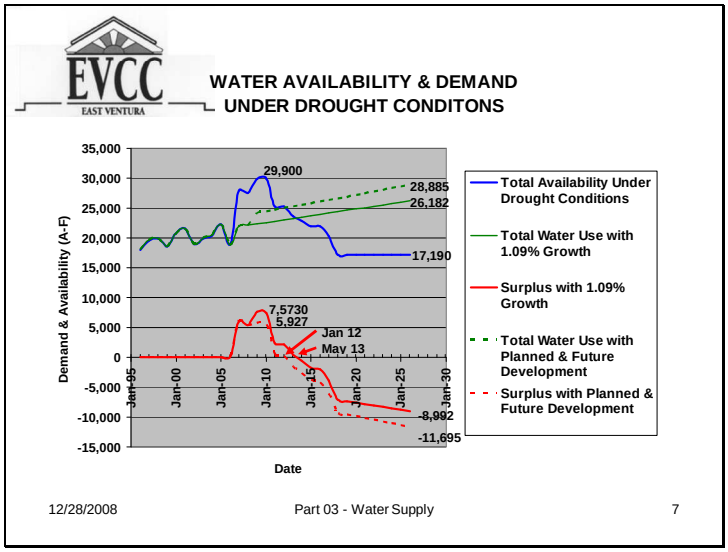
Under non-drought conditions, it is estimated that a surplus of 1,315 AFY will exist by 2025.

Slide 7



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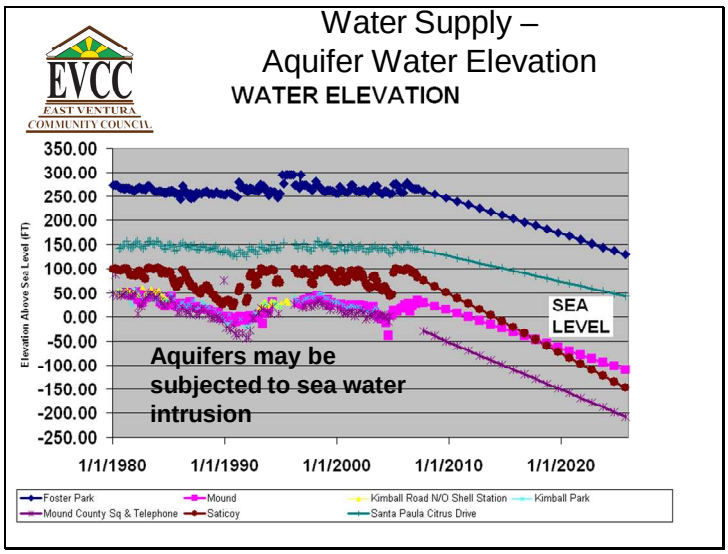
The current population of the City of San Buenaventura is 106,710 persons.
A maximum population of 96,033 persons can be supported by the minimum drought condition water supply.
Water demand can exceed supply under severe drought conditions with the current planned population growth after May 2013 and Jan 2012 under the planned and current population estimates.

Slide 8



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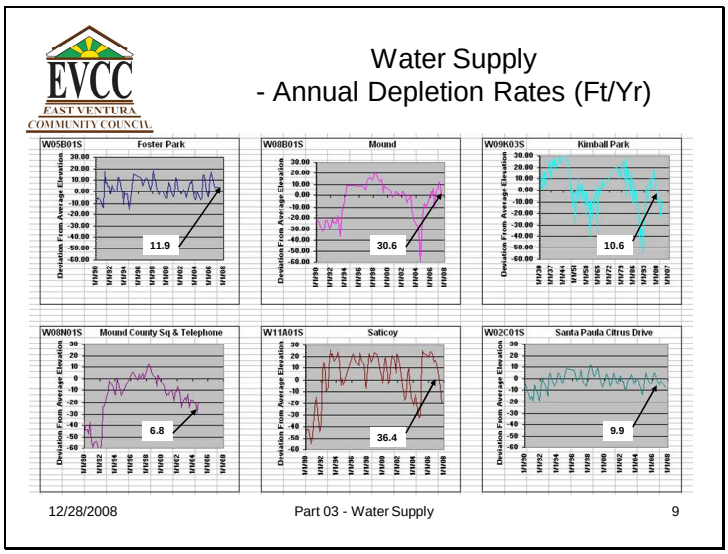
The aquifers may be subjected to sea water intrusion thereby, destroying the well.[1]

[1] Ref: Water Supply & Drought Conclusions 05 Sep 2007

Slide 9



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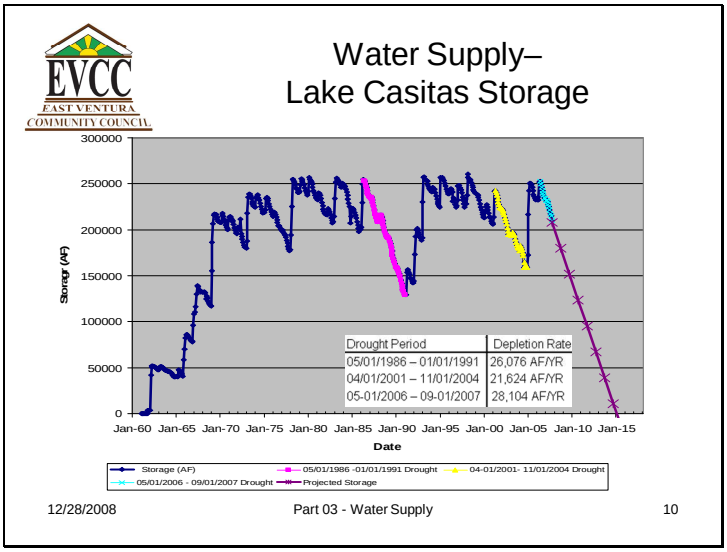
Water Supply - Annual Depletion Rates (Ft/Yr)

Slide 10



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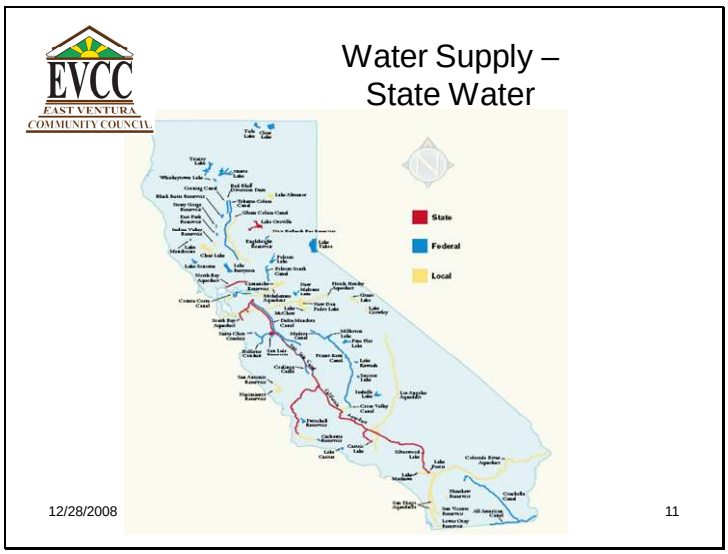
Water Supply–Lake Casitas Storage

Water deliveries from Lake Casitas exceed the safe annual yield. The safe annual yield average of Lake Casitas is 20,840 acre-feet during a historical drought period and 19,780 acre-feet during a drought recovery period per the 2005 Casitas MWD Urban Water Management Plan. Annual Depletion Rates of 21,264-28,104 have been experienced during recent drought periods.

Until sufficient precipitation is received to sustain and replenish Lake Casitas, the water elevation will continue to decrease until the lake becomes dry.

Slide 11



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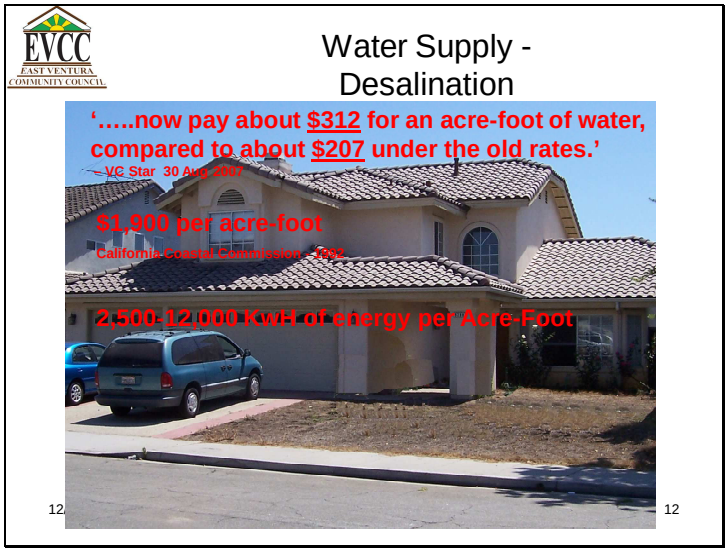
Water Supply – State Water

Even though the City of San Buenaventura has a right to 10,000 acre-feet of water annually, it would appear that the current drought has eliminate state water as a source of supply.
Water year 2007 is a dry year statewide, and especially in Central and Southern California. Much of Southern California is on track to have one of the driest precipitation years of record, potentially surpassing the prior record set in 2001-02. In Northern and Central California, forecasts of unimpaired runoff from Sierra Nevada watersheds are well below average. The Colorado River Basin, an important source of water supply for Southern California, continues in drought conditions, having experienced below average runoff in six of the last seven years. [2]

[2] Ref: California Department of Water Resources, http://watersupplyconditions.water.ca.gov/

Slide 12



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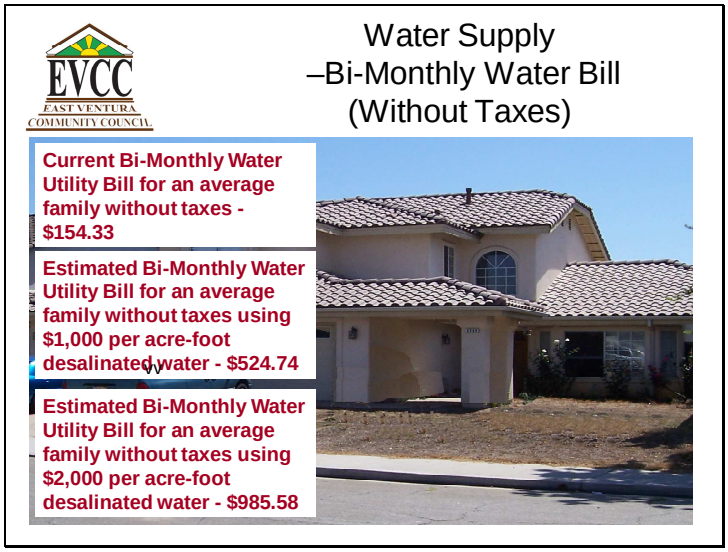
The Lake Casitas Municipal Water District has raised the price of water by 150% to wholesale buyers from $207 to $312 per acre-foot.
One estimate places the price of desalinated water at $1,900 per acre-foot.
Even though the City of San Buenaventura can use water directly from the ocean, Mayor Morhouse has reported the League of California Cities has advised its memeber cities to plan for a future energy shortage. It is estimated that 2,500 to 12,000 KwH of energy is required to produce one acre-foot of desalinated water.[3]

[3] Ref: Water Supply & Drought Conclusions 05 Sep 2007

Slide 13



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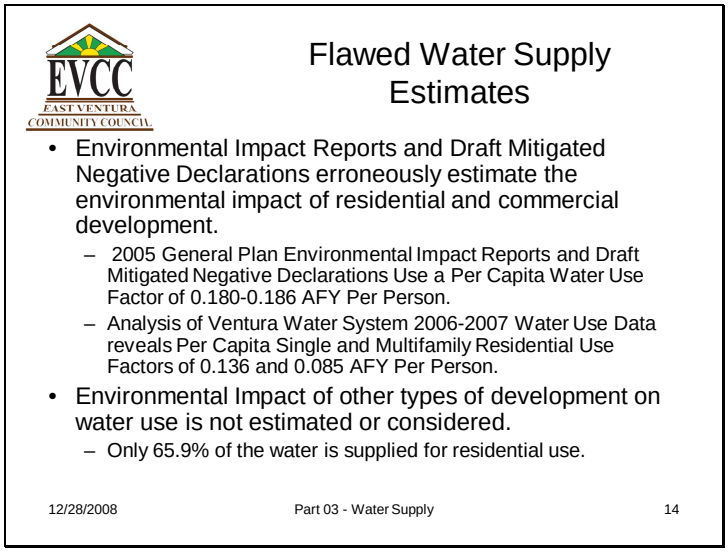
Current Bi-Monthly Water Utility Bill for an average family without taxes - $154.33
Estimated Bi-Monthly Water Utility Bill for an average family without taxes using $1,000 per acre-foot desalinated water - $524.74
Estimated Bi-Monthly Water Utility Bill for an average family without taxes using $2,000 per acre-foot desalinated water - $985.58[4]

[4] Ref: Desal Residential Water Cost Estimate 2007 09 09

Slide 14



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Flawed Water Supply Estimates

Environmental Impact Reports and Draft Mitigated Negative Declarations erroneously estimate the environmental impact of residential and commercial development.

2005 General Plan Environmental Impact Reports and Draft Mitigated Negative Declarations Use a Per Capita Water Use Factor of 0.180-0.186 AFY Per Person.

Analysis of Ventura Water System 2006-2007 Water Use Data reveals Per Capita Single and Multifamily Residential Use Factors of 0.136 and 0.085 AFY Per Person.

Environmental Impact of other types of development on water use is not estimated or considered.

Only 65.9% of the water is supplied for residential use

Slide 15

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Per Capita Water Use Demand Computation

EIR & DMND Per Capita Demand			**0.180-0.186**
SF Residential Use			**8,174.150**
SF Residential Accts	÷	**23,151.000**	
Persons Per DU	x	**2.600**	
SF Residential Population	÷	**60,192.000**	**60,192.000**
SF Residential Use Per Person	=		**0.136**
MF Residential Use	=		**4,111.110**
2006 Biennial Water Supply Report Projected Population	=	**108,651.000**	
SF Residential Population	-	**60,192.000**	
MF Residential Population	÷	**48,459.000**	**48,459.000**
MF Residential Use Per Person	=		**0.085**

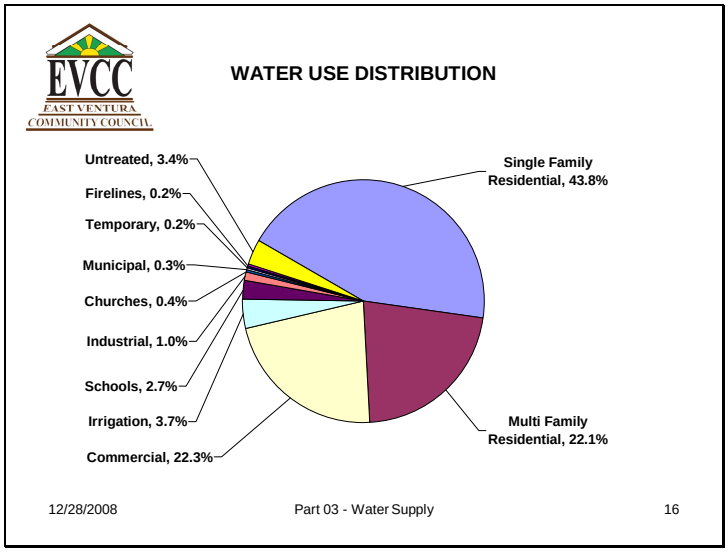
12/28/2008 Part 03 - Water Supply 15

10.40

Per Capita Water Use Demand Computation

Per Capita Water Use Demand Computation in EIR & DMND is 0.3 to 1.2 times greater than that which is computed from the 2007 City of San Buenaventura Ventura Water System use data. With 65.9% of water used for residential consumption, the expected increase in demand for 34.1% of water for other water uses is not identified in EIR or DMND.
The 2004 Biennial Water Supply Report lists a projected 2006 Water System Population of 108,621 persons.

Slide 16



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Water Use Distribution

Residential Use	65.9%
Other	34.1%

Slide 17

Ventura Water System 2006-2007 Water Use Data

FISCAL YEAR 2006 - 2007 DATA

	CITY		COUNTY	
	Water Use (A/F)	Number of Accounts	Water Use (A/F)	Number of Accounts
Residential				
Single Family	7,814.57	22,120	359.58	1,031
Multi Family	4,024.09	2,237	87.02	95
Sub-Total	11,838.66	24,357	446.60	1,126
Commercial	3,849.01	2,387	300.39	132
Industrial	191.50	8		1
Municipal	52.68	59		
Untreated	0.00	0	642.73	2
Schools	498.49	66		
Churches	70.95	56	1.24	6
Firelines	10.72	2,957	23.41	57
Irrigation	594.75	239	86.21	4
Temporary	34.34	56		
Sub-Total	5,302.44	5,828	1,053.98	202
TOTAL	**17,141.10**	**30,185**	**1,500.58**	**1,328**

12/28/2008 Part 03 - Water Supply 17

10.40

Ventura Water System 2006-2007 Use Data

Ventura Water System 2006-2007 Water Use Data indicates that the water systems supplies 18,641.78 AF of water to 31.513 Customers in both the City and County of Ventura.[5]

[5] Source: City of Ventura E-mail dated 18 June 2008, Ventura Water System, Lisa Kern, Utilities Analyst

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.41

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative. 10.42

The EIR does not address the City Council action taken on 06 Oct 2008 denying the proposed reclassification of Telegraph Road from a Secondary Arterial Roadway to a Collector Roadway. 10.43

The EIR does not address the estimated cost to the City of $526,106.57 to delay paving and installing gutters on the unimproved right-of-way at a later date.

The EIR does not address impacts on 2005 General Plan due to intensification of land use beyond 2005 General Plan housing densities. 10.44

The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative on surrounding neighborhood streets. 10.45

The EIR does not addresses the cumulative effect of residential development on Wells Road Traffic. 10.46

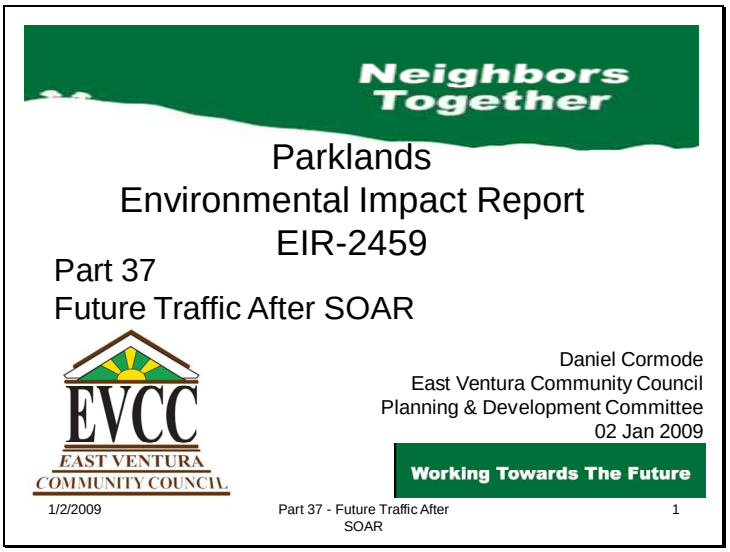
The EIR fails to discuss the errors in traffic planning resulting from using urban trip generation rates for different type of housing in a suburban environment. 10.47

The EIR does not address the adverse physical, economic or social impacts of increased traffic or required infrastructure improvements from either the specific residential development or the cumulative impact of residential development. 10.48

The EIR does not address the increase in traffic and subsequent adverse impact on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32 10.49

The above statements are substantiated by information contained in the attached slides

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 37
Future Traffic After SOAR
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
02 Jan 2009
Working Towards The Future
1/2/2009
Part 37 - Future Traffic After SOAR
1

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Slide 2

Traffic

- Change in Wells & Telegraph Roadway Classification Denied.
- Telegraph & Wells Road ADT Volumes.
- Future Telegraph Road Traffic After SOAR.
- Future Wells Road Traffic After SOAR.
- Wells Road Major Arterial
- Arterial Street Standards
- Increased Residential Street Traffic
- Growth By Land Use Underestimated
- Wells-Saticoy Residential Development Projects
- ADT Generation Underestimated.
- Roadway Improvements-(Scenario 2) Streets
- Roadway Improvements (Scenario 2) Intersections
- Roadway Improvements (Scenario 2) Non-Comitted)
- 2025 Intersection Capacity Utilization
- Roadway Classifications – (Scenario 2)

1/2/2009 Part 37 - Future Traffic After SOAR 2

10.50

Slide 3

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Traffic

- Current Wells Road Traffic
- Planning Communities & Subareas
- Comparison of 2005 General Plan FEIR and Planned and Future Projects – Infill Only
- Persons Per Vehicle
- Time of Leaving for Work
- Means of Transport
- Travel Time To Work
- Work Radius
- Personal Travel Per Household
- Daily Vehicle Miles Per Household

1/2/2009 Part 37 - Future Traffic After SOAR 3

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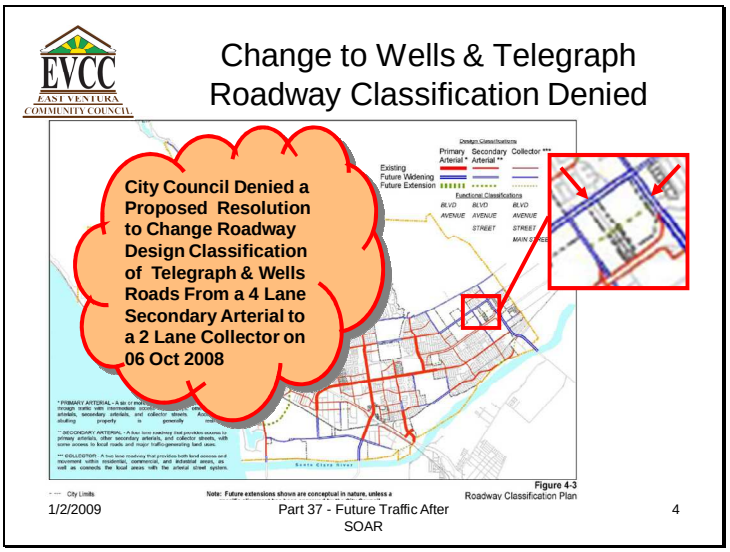
Slide 4



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Future Development

EIR is inconsistent with City Council Direction.

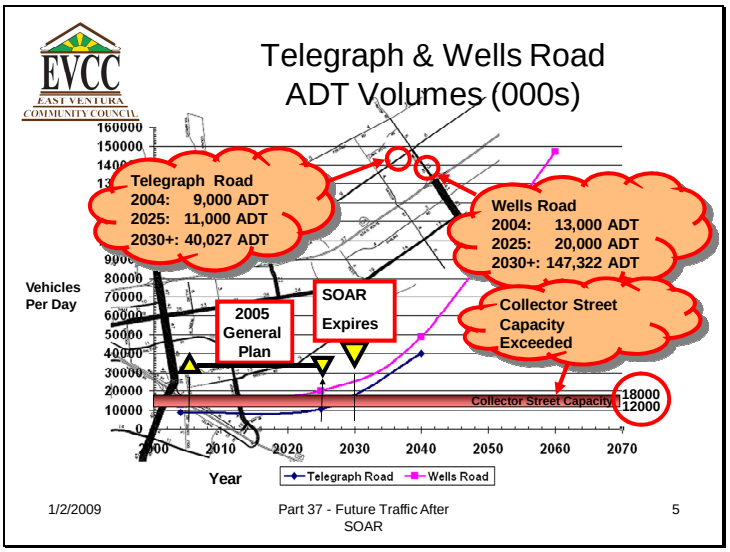
City Council denied a proposed resolution amending the 2005 General Plan to change in the roadway designation of the segment of Telegraph Road between Saticoy Avenue and Wells Road from a 4-lane Secondary Arterial to a 2-lane Collector on 06 Oct 2008.

The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative.

Telegraph Road and Wells Road south of Telegraph Road are designated as secondary arterial (4 lane) streets in the 2005 General Plan.

This proposed redesignation change will create another traffic congestion problem similar to Johnson Drive at Bristol Road.

Slide 5



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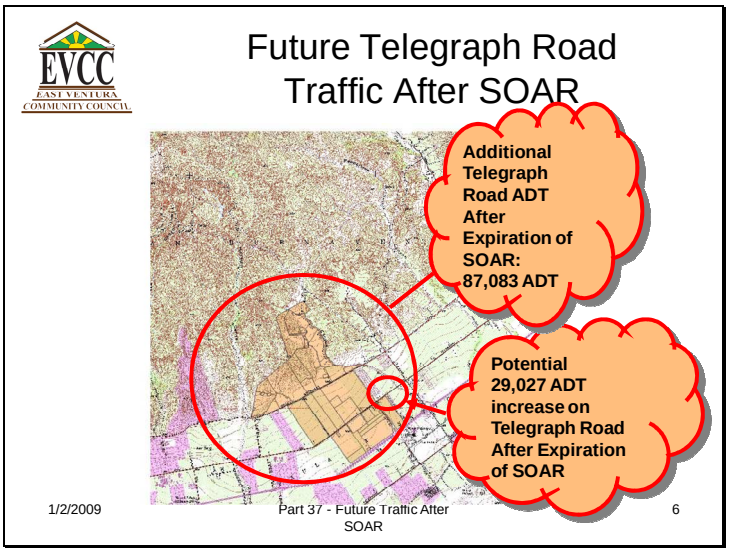
Projected ADT Volumes Resulting From Expiration of SOAR Initiative		
Year	Telegraph Road	Wells Road
2004	9,000	13,000
2005-2025 Increase	2,000	7.000
2025 Total	11,000	20,000
2030 Increase	29,027	127,322
2030+ Total	40,027	147,322

.Source: 2005 General Plan FEIR, Figure 2-2

Estimated Cost to Pave and Install Gutters on Increased Right-of-Way							
Description	Width	Width Units	Length	Length Units	Rate	Rate Units	Cost ($)
Sidewalk Removal	6	FT	2922	FT	$10.00	$/SF	$175,320.00
Curb & Gutter Removal	1		2922	LF	$10.00	$/LF	$29,220.00
Install Curb & Gutter	1		2922	LF	$16.95	$/LF	$49,527.90
Install Sidewal	6	FT	2922	FT	$4.77	$/SF	$83,627.64
Install Handicap Ramps	1		3	EA	$3,273.55	$/EA	$9,820.65
Install Landscaping	1		2922	LF	$10.00	$/LF	$29,220.00
Install Parkway Trees	1		97	EA	$215.06	$/EA	$20,860.82
Install Aggregate Base	10	FT	2922	FT	$1.06	$/SF	$30,973.20
Install Asphalt Concrete	10	FT	2922	FT	$3.18	$/SF	$92,919.60
Install Single Skip Striping	1		2922	LF	$0.79	$/LF	$2,308.38
	1		2922	LF	$0.79	$/LF	$2,308.38
						Total	$526,106.57

10.50

Slide 6



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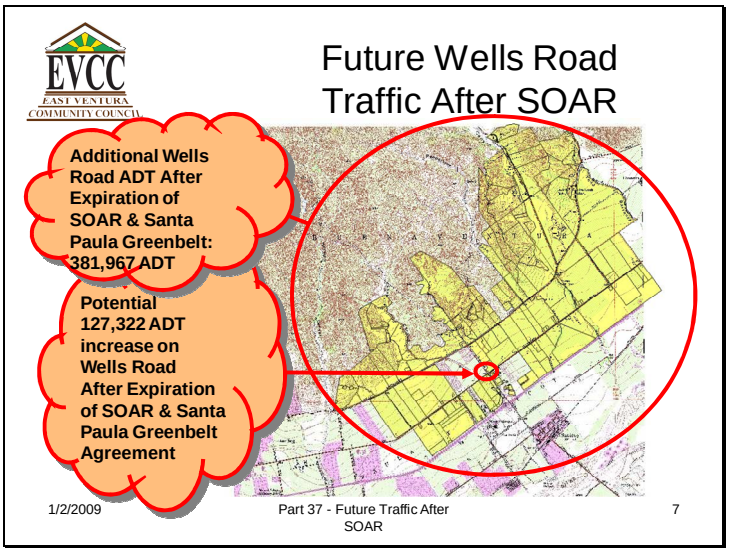
Additional Telegraph Road ADT After Expiration of SOAR

A future potential ADT increase of 87,083 ADT is expected due to development of property west of Saticoy Avenue after expiration of SOAR based on an estimated developable area of 1,089 acres with a density of 8 dwelling units per acre and 10 ADT per dwelling Unit.

The potential impact on the segment of Telegraph Road from Saticoy Avenue to Wells Road could be 27,027 ADT if it is assumed that the traffic direction is uniformly distributed in the westerly, southerly and easterly direction.

Slide 7



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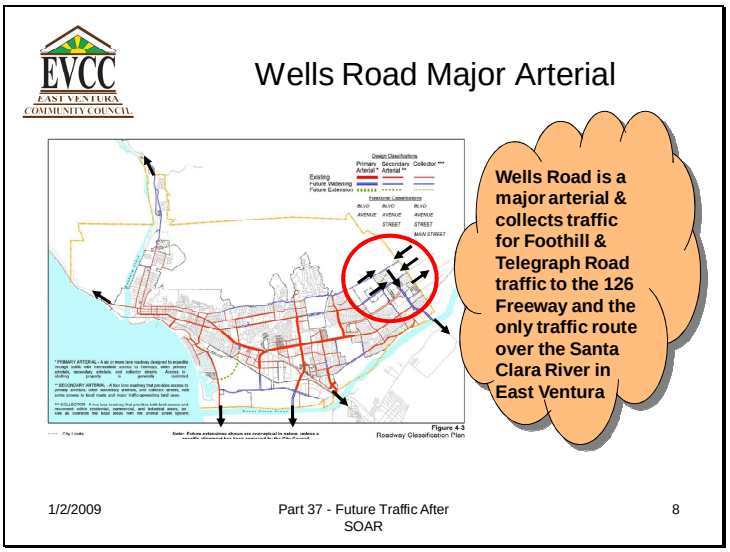
Additional Wells Road ADT After Expiration of SOAR & Santa Paula Greenbelt Agreement

A future potential ADT increase of 381,967 ADT is expected due to development of property north of the intersection of Wells Road and HWY 126 after expiration of SOAR & the Santa Paula Greenbelt Agreement based on an estimated developable area of 4,775 acres with a density of 8 dwelling units per acre and 10 ADT per dwelling Unit.

The potential impact on the segment of Wells Road at HWY 126 could be 127,322 ADT if it is assumed that the traffic direction is uniformly distributed in the westerly, southerly and easterly direction.

Slide 8



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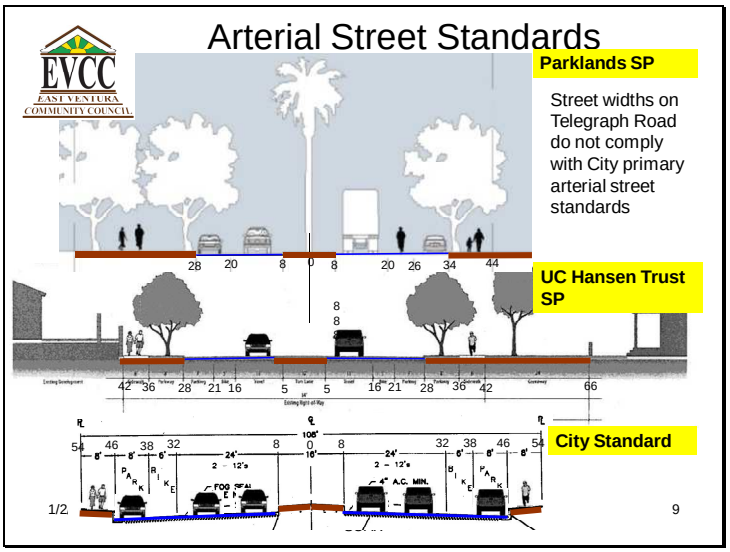
Wells Road is a major arterial for Foothill & Telegraph Road traffic to the 126 Freeway and the only traffic route over the Santa Clara River in East Ventura.

Ref: WSCP Transportation 2007 07 27

Slide 9



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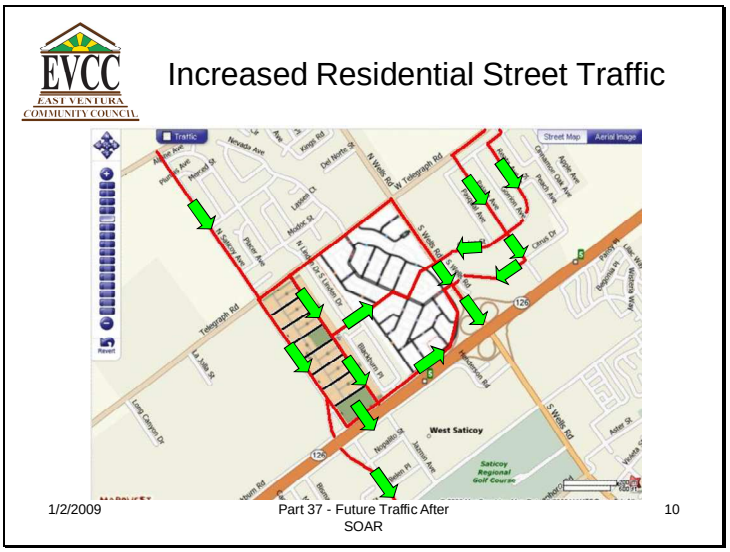
Proposed street widths on Telegraph Road do not comply with City primary arterial street standards.

Ref: WSCP Transportation 2007 07 27

Slide 10



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Increased Residential Street Traffic

The EIR does not address the adverse impact of narrowing the right-of-way which prevents expansion to accommodate future increased capacity of Telegraph Road or Wells Road after the expiration of the SOAR Initiative on surrounding neighborhood streets.

Attempts to bypass congested Telegraph and Wells Roads will result in increased traffic on neighborhood streets.

Johnson Drive north of Bristol Road is a good example of failure to plan for right-of-way expansion to accommodate future growth.

Slide 11

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Growth By Land Use Type Underestimated

Residential Growth of 1138 DU Underestimated by 7%

Residential Growth of 1410 DU Underestimated by 22%

Sub-Area	Residential (DUs)	Non-Residential				
		Retail (TSF)	Office (TSF)	Industrial (TSF)	Hotel (TSF)	Total (TSF)
1	389	40	105	600	0	745
2	1,109	43	95	100	0	238
3	1,665	103	170	0	362	635
4	512	28	60	0	0	88
5	431	96	0	9	107	213
6	440	82	100	0	0	182
7	200	43	343	1,216	0	1,602
8	1,484	110	439	0	0	549
9	50	155	58	765	0	979
10	844	15	149	173	0	338
11	200	50	70	50	0	170
12	10	0	0	0	0	0
13	1,059	91	256	0	0	347
14	1,147	17	20	0	0	37
15	70	0	0	75	0	75
16	1,196	165	12	0	0	177
17	435	0	0	0	0	0
Total Growth	11,241	1,038	1,877	2,988	469	6,372
Existing	41,784	6,632	5,090	9,900	2,213	23,836
Future	53,025	7,670	6,967	12,889	2,682	30,208
% Growth	26.9	15.6	36.9	30.2	21.2	26.7

1/2/2009 Part 06 - Traffic 11

10.50

Growth By Land Use Type – Scenario 2

Estimated residential growth has been exceeded due to intensification above densities estimated in 2005 General Plan.

Slide 12

Wells-Saticoy Community Residential Development Projects

Project	Name	Location	Dwelling Units
RC-071	Chapel Lane Courtyard I	11212 Snapgragon St	16
RC-079	Chapel Lane Courtyard II	11170 Snapdragon St	15
RC-096	Henderson Road Condos	10980 Henderson Rd	4
RS-090	Aldea Hermosa	North of Darling Rd, East of Wells Rd	47
RS-091	The Cottages	Southwest corner of Henderson & Saticoy Ave	38
TBD11	Enclave	SE of North Bank Drive & Saticoy Ave	95
TBD14	Paseo Barranca	E of North Bank Dr	152
TBD16	Las Brisas	SE Cor of Los Angeles Ave & Rosal Lane	165
TBD17	Saticoy Gateway	NE Cor Wells & Darling	270
TBD12	Saticoy Village - East	SE Cor of Wells & Darling	106
TBD13	Saticoy Village - West	SE Cor of Wells & Darling	230
			1138
RA-116	Citrus Place Apts	East Ventura corner of Citrus Dr & Peach Av	60
HAP-17	Citrus Center	Citrus Drive	152
RC-080	Citrus Place Condos	East Ventura corner of Citrus Dr & Peach Av	60
RC-085	Parklands Condos	Southwest corner of Wells Rd & Telegraph Rd	283
RS-096	Citrus Place Homes	East Ventura corner of Citrus Dr & Peach Av	59
RS-099	Parklands Homes	Southwest corner of Wells Rd & Telegraph Rd	216
TBD15	UC Hansen Trust	SE Cor of Telegraph & Saticoy	221
TBD18	Citrus Center	Citrus Drive	152
TBD19	90-0-025-015	Telegraph Road	26
TBD20	90-0-025-025	Telegraph Road	61
TBD21	90-0-025-305	Wells Road & Carlos	120
			1410

1/2/2009 Part 37 - Future Traffic After SOAR 12

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Slide 13

ADT Generation – Scenario 2 Underestimated

Sub-Area	Growth (ADT)	Existing (ADT)	Future (ADT)	% Growth
1	11,589	14,378	25,968	80.6
2	11,748	51,744	63,492	22.7
3	22,036	84,647	106,683	26.0
4	6,965	110,423	117,388	6.3
5	13,280	50,251	63,530	26.4
6	8,936	163,583	172,518	5.5
7	17,801	84,677	102,477	21.0
8	30,295	5,104	35,399	593.6
9	11,016	21,147	32,164	52.1
10	8,895	140,508	149,403	6.3
11	9,086	17,419	26,505	52.2
12	197	18,885	19,082	1.0
13	20,609	15,114	35,723	136.4
14	9,995	14,969	24,964	66.8
15	916	8,047	8,963	11.4
16	19,757	92,749	112,506	21.3
17	3,784	27,476	31,259	13.8
Total	206,905	921,119	1,128,024	22.5

ADT Generation Underestimated

ADT Underestimated

1/2/2009 Part 06 - Traffic 13

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Growth in ADT Generation – Scenario 2

ADT generation is underestimated as a result of increased intensification.

Slide 14

Roadway Improvements – Scenario 2 Streets

1. Streets	
A Street (Saticoy Avenue to Wells Road)	New two-lane roadway
Harbor Boulevard Bridge over the Santa Clara River	Widen to four lanes
Hill Road (Moon Drive to Ralston Street)	Extend as two-lane roadway
Johnson Drive (North Bank Drive to Bristol Road)	Widen to six lanes (a)
North Bank Drive (City limits to Wells Road)	New two-lane roadway
North Bank Drive (Current terminus to Saticoy Avenue)	New two-lane roadway
Telegraph Road (Saticoy Avenue to Wells Road)	Widen to four lanes
Thille Street (Telephone Road to current terminus)	Extend as two-lane roadway
US-101 Off-ramp to California Street	Relocate to Oak Street
Victoria Avenue (US-101 to City limits)	Widen to six lanes
Wells Road (SR 126 to City limits)	Widen to six lanes
Wells Road (Foothill Road to SR 126)	Widen to four lanes

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Slide 15

Roadway Improvements – Scenario 2 Intersections

The Parklands and UC Hansen Trust Specific Plans reduce the lanes on Telegraph & Wells Roads and are inconsistent with the 2005 General Plan FEIR

What are the expenditures, revenues and schedules for improving roads and intersections?

2. Intersections	
20 [illegible] Olivas Park Drive	Add second southbound [illegible]
[illegible] phone Road	Convert southbound left-t[illegible] turn/right-turn lane
[illegible] one Road	Convert separate westboun[illegible] through/right-turn lane and add[illegible] Right-turn lane
[illegible] ark Drive	Add second northbound and southbound left-turn lanes, third northbound and southbound through lanes, second eastbound left-turn lane and second westbound through lane
[illegible] oad at Olivas Park Drive	Add double southbound left-turn lanes, second eastbound left-turn lane and second eastbound and westbound through lanes
91. Johnson Drive at Ralston Street	Add second northbound and southbound through lanes
92. Johnson Drive at Bristol Road	Add second northbound and southbound through lanes
94. Johnson Drive at North Bank Drive	Convert southbound right-turn lane to shared through/right-turn lane
104. Wells Road at SR 126 EB Ramps	Add third northbound and southbound through lanes
105. Wells Road at Darling Road	Add third northbound and southbound through lanes
106. Wells Road at Telephone Road	Add third northbound and southbound through lanes
160. Victoria Avenue at US 101 NB Ramps	Convert westbound shared left-turn/right-turn lane to dedicated left-turn lane and add third westbound right-turn lane
175. Ventura Boulevard at North Bank Drive	Add second eastbound through lane

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Slide 16

Roadway Improvements – Scenario 2 Non-Committed

II. Non-Committed	
1a. Streets (Alternative Network)	
B Street (Mills Road to Telephone Road)	New two-lane roadway
Kimball Road (Telephone Road to North Bank Drive)	New four-lane roadway
Mills Road (Arundell Avenue to Harbor Boulevard)	New four-lane roadway
North Bank Drive (Johnson Drive to Bristol Road)	New four-lane roadway
Ralston Street (Ramelli Avenue to Montgomery Avenue)	New two-lane roadway

Location	***Improvement***
2. Intersections (Baseline Network)	
105. Wells Road at Darling Road	Add eastbound left-turn lane, second southbound left-turn lane and second westbound left-turn lane
2a. Intersections (Alternative Network)	
27. Mills Road at Main Street	Add northbound left-turn lane and second northbound and southbound through lanes
94. Johnson Drive at North Bank Drive	Improve eastbound approach to provide two left-turn lanes, three through lanes and a separate right-turn lane, and improve westbound approach to provide three left-turn lanes and two through lanes
105. Wells Road at Darling Road	Add eastbound left-turn lane, second southbound left-turn lane and second westbound left-turn lane
175. Ventura Boulevard at North Bank Drive	Add third eastbound through lane

1/2/2009 Part 06 - Traffic 16

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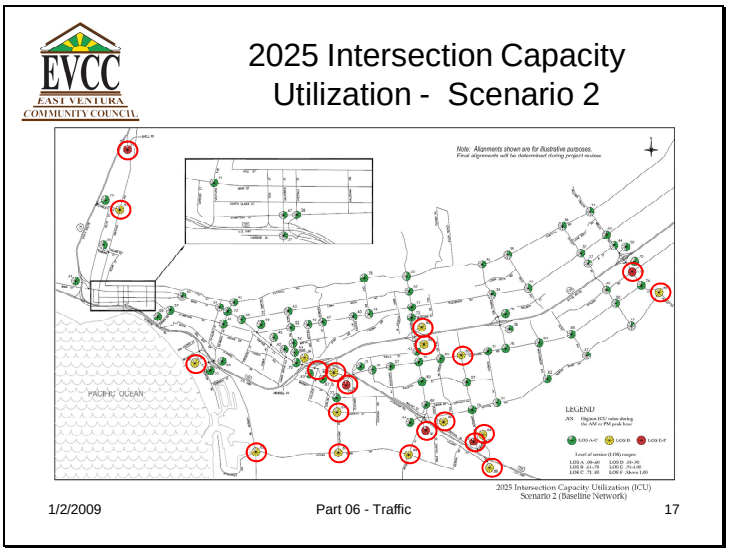
Slide 17



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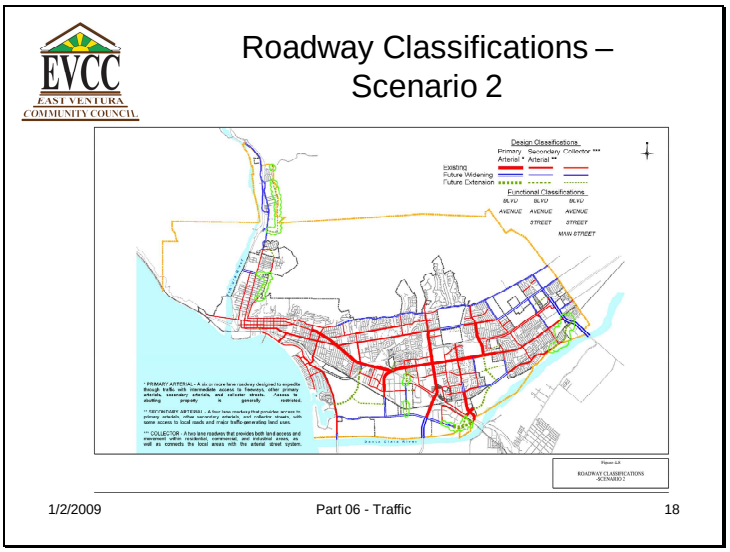
2025 ICU – Scenario 2

How and when will the roadway improvements bf funded and what is the revenue source?

Slide 18



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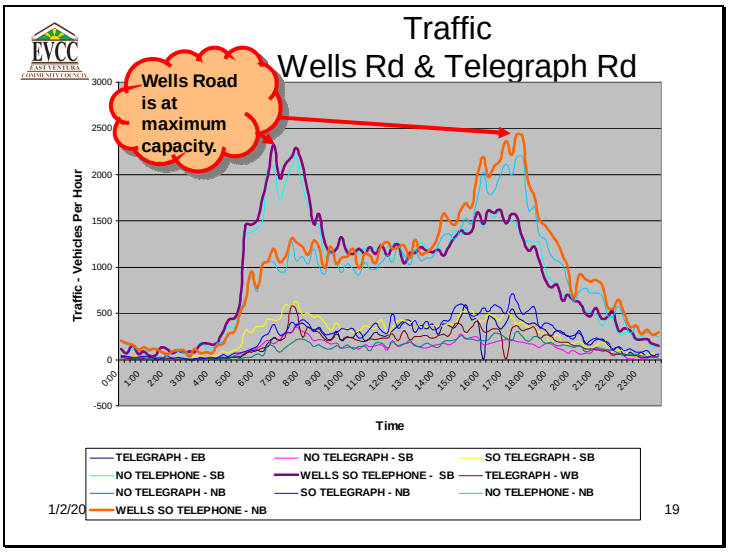
Roadway Classifications – Scenario 2

Slide 19



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The EIR does not addresses the cumulative effect of residential development on Wells Road Traffic.

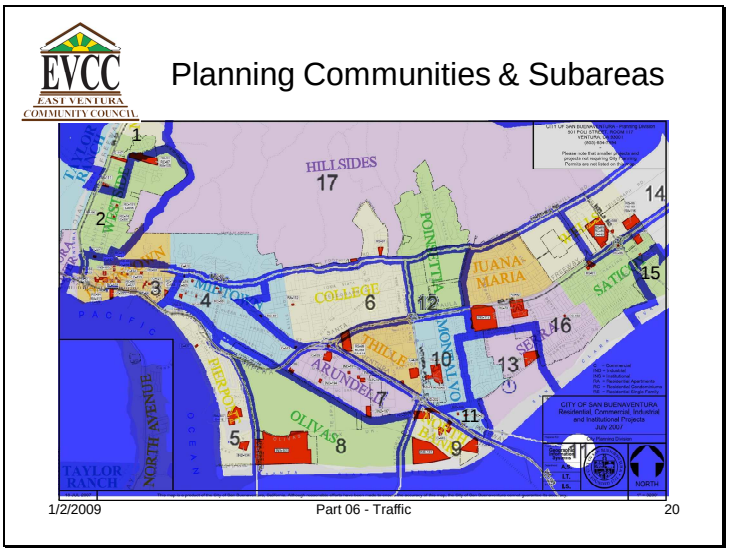
Traffic southbound on Wells Road south of Telephone Road reaches a peak of 2,284 vehicles per hour at 7:45 AM.

Traffic northbound on Wells Road south of Telephone Road reached a peak of 2,428 vehicles per hour at 5:30 PM.

The relative flatness of the traffic curve indicates maximum traffic capacity has been reached.

Ref: WSCP Wells Road Traffic 2007 02 23

Slide 20



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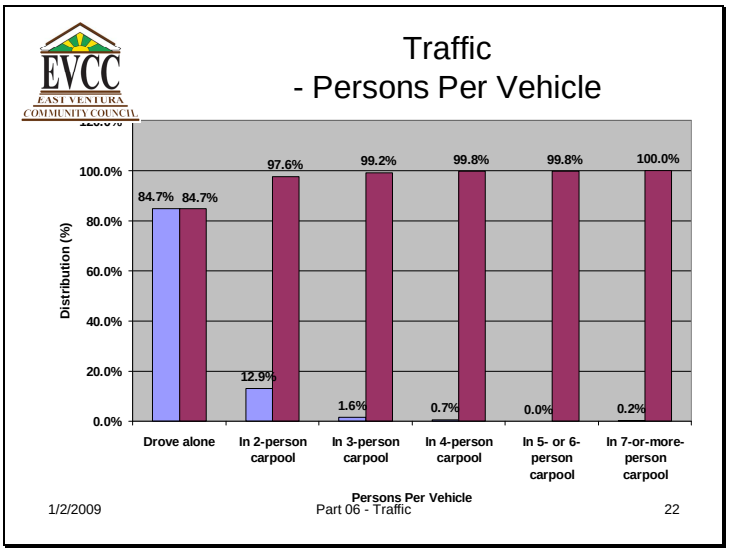
Slide 22



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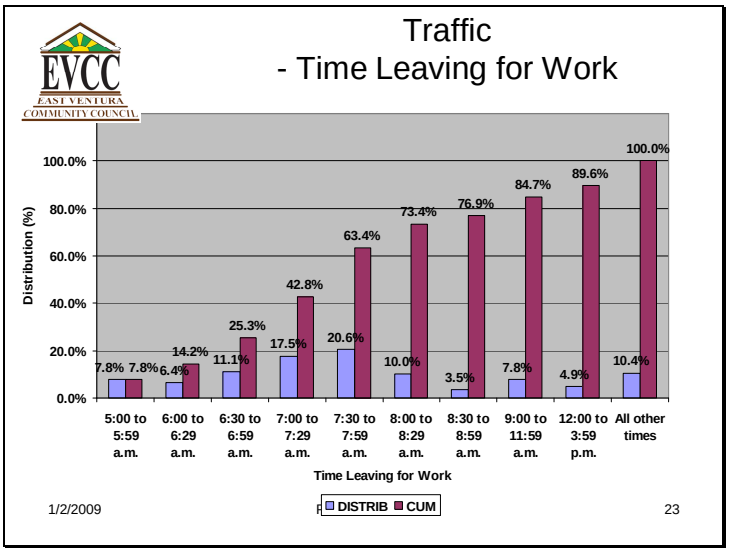
The 2000 US Census for Tracts 12.01, 13.01 & 13.02 reports **84.7%** of the persons employed drive to work alone.

The resulting increase of an additional 6,130 employees residing in the City of San Buenaventura will add more than **5,192** drivers and vehicles to the already congested roads and highways.

Source: 2000 US Census Tracts 12.01, 13.01 & 13.02

Slide 23



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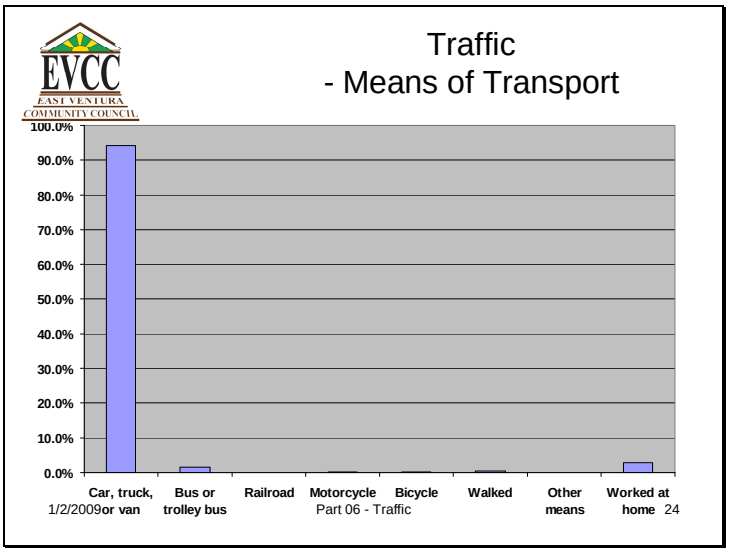
Over **63%** of those employees will leave for work before 8:00 AM.

Source: 2000 US Census Tracts 12.01, 13.01 & 13.02

Slide 24



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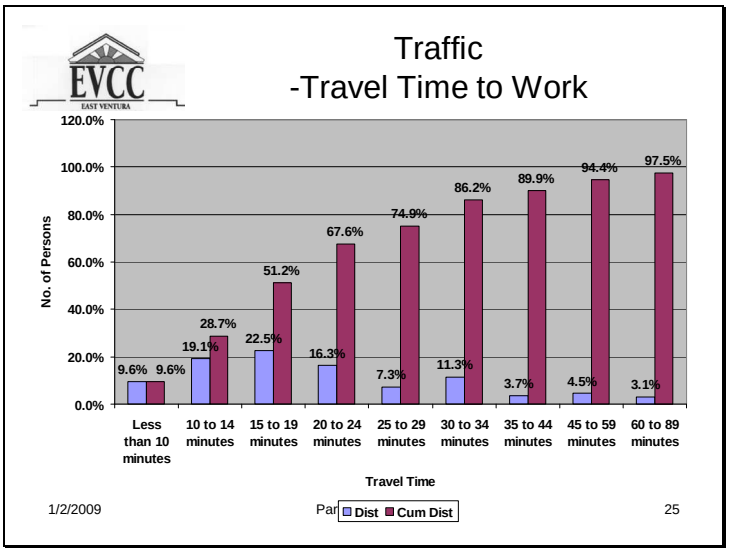
Over **94%** of those employees will travel to work by car, truck or van.

Source: 2000 US Census Tracts 12.01, 13.01 & 13.02

Slide 25



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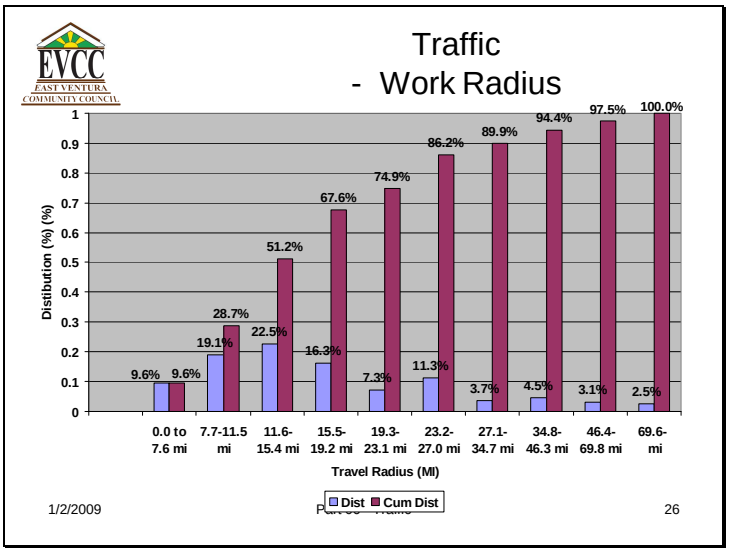
Over **90%** of those employed travel over 10 minutes to work.

Ref: US 2000 Census Journey to Work P23 1201 1301 1302 2007 09 27

Slide 26



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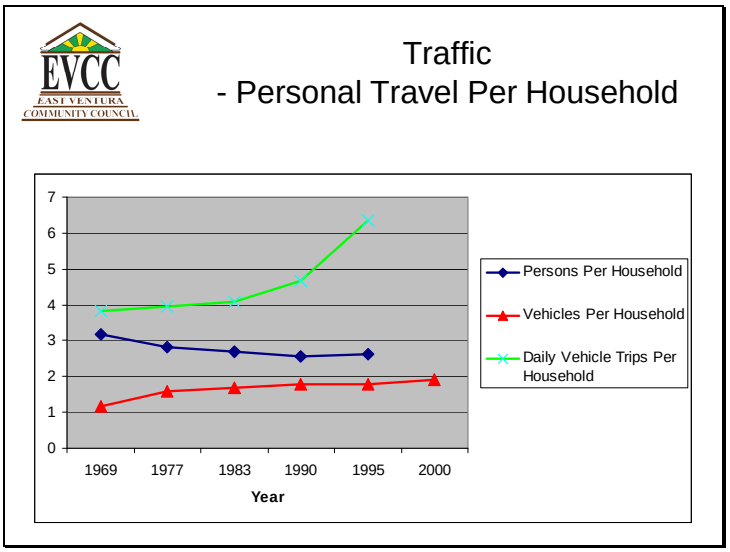
It is estimated that over 90% of the employees are commuters who travel over 7.6 miles to work based on an average congested freeway speed of 46.43 miles per hour and do not live and work in the same location.

Ref: US 2000 Census Journey to Work P23 1201 1301 1302 2007 09 27

Slide 27



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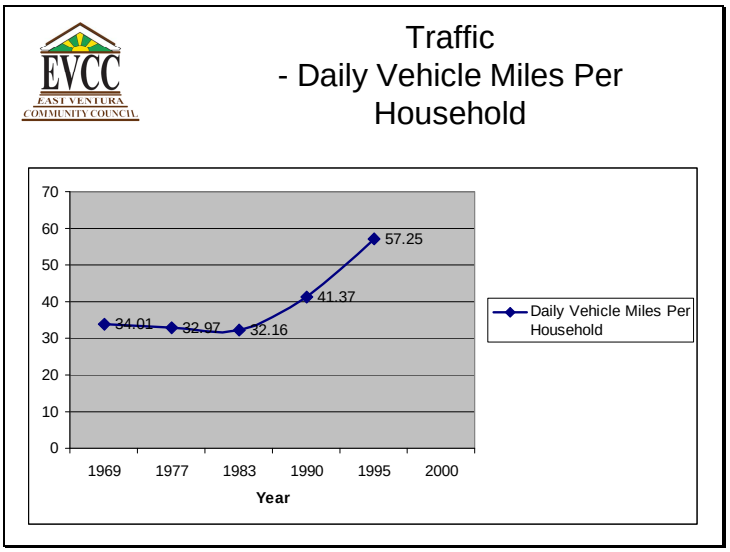
The number of daily vehicle trips per household increased from a little less than 4 to over 6 between 1969 and 1995.

Source: Census 2000 Demographic Profile for ZIP Code Area 93004.

Slide 28



10.50

The number of daily vehicle miles per household increased from 34.01 in 1969 to 57.25 in 1995.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.51

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development nor determine the cumulative environmental impact of the proposed residential development on the subject area of concern.

Description of the visual impact of the soundwall on views of the hills and mountains contained in the EIR is incomplete.

Description of the visual impact of the proposed development on views from Telegraph Road is incomplete.

The EIR does not identify the visual impact of placing a soundwall on Blackburn Road. 10.52

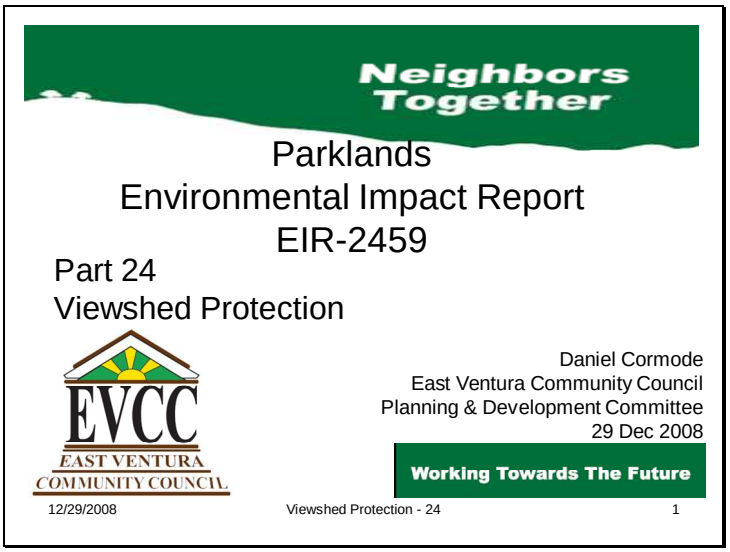
The EIR does not address the cumulative effect of freeway soundwalls from Franklin Barranca to Saticoy Avenue on the viewshed.

The visual impact of the proposed residential development on views looking north from Wells Road are not adequately described.

The EIR does not describe the visual impact of high rise buildings along Telegraph or Wells Roads.

The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 24
Viewshed Protection
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
29 Dec 2008
Working Towards The Future
12/29/2008
Viewshed Protection - 24
1

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Slide 2

EVCC
EAST VENTURA COMMUNITY COUNCIL

Parklands Draft EIR-2459 Excerpts

Based on the wall height, distance from the viewers to the wall, and distance to the hillsides behind the wall, views of the hillsides from the portion of SR 126 adjacent the plan area would be obstructed by a continuous and potentially monolithic wall. The creation of a monolithic structure along the freeway edge would potentially create an aesthetically offensive condition and is therefore a potentially significant impact.

Soundwall Aesthetics. Views of the proposed sound wall abutting SR 126 shall be softened through installation of landscaping such as trees, shrubs and climbing vines, resulting in a variety of textures and colors. Prior to Final Map approval, the Design Review Committee shall review and approve landscaping and irrigation plans. Prior to occupancy of any dwelling unit within the plan area, the sound wall, landscaping and irrigation shall be installed.

Wells Road. Following development, viewers along Wells Road would see primarily multi-family residential structures if looking to the west. The visually sensitive designation for Wells Road is intended to preserve views of the hillsides, which are visible when traveling northbound toward the hillsides at the terminus of Wells Road. The proposed development would not interfere with views of the hillsides, as the Wells Corridor leads straight to the hillsides, while the proposed development would occur adjacent the western boundary of Wells Road. Thus, the project's effects with respect to the Wells Road visual corridor and obstruction of hillside views would be less than significant.

Telegraph Road. With respect to Telegraph Road, the proposed development would occur south of Telegraph Road, whereas the hillsides lie to the north. Thus, although the proposed development would alter the character of views to the south by converting agricultural land to residential use, it would not obstruct views of the hillsides to the north. Thus, the visual effect of plan area development along the Telegraph Road corridor would be less than significant.

Plan area development would alter the visual character of the plan area, but would not block views of ridgelines to the north of the plan area from SR 126. However, a freeway sound wall proposed in Section 4.8, *Noise*, would partially block views from the freeway and would potentially create a monolithic structure as viewed from the freeway. Impacts associated with the sound wall would be Class II, *significant but mitigable*.

Development facilitated by the proposed Specific Plan would alter the visual character of the plan area by replacing existing agricultural land with residential and commercial uses. Although some individuals may view this change as adverse, the change for this area was envisioned in the Ventura General Plan and the proposed development would not create an aesthetically offensive condition. Thus, the impact to the plan area's visual character is considered Class III, *less than significant*.

12/29/2008 Viewshed Protection - 24 2

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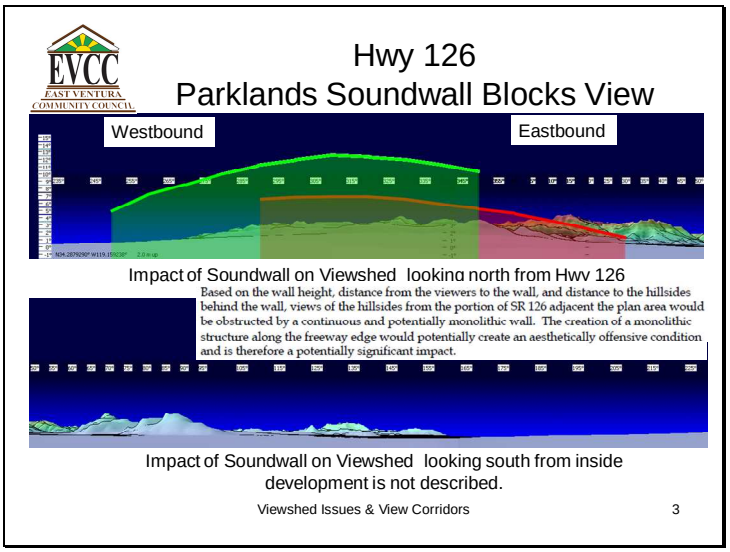
Slide 3



10.52

Description of the visual impact of the soundwall on views of the hills and mountains contained in the EIR is incomplete.

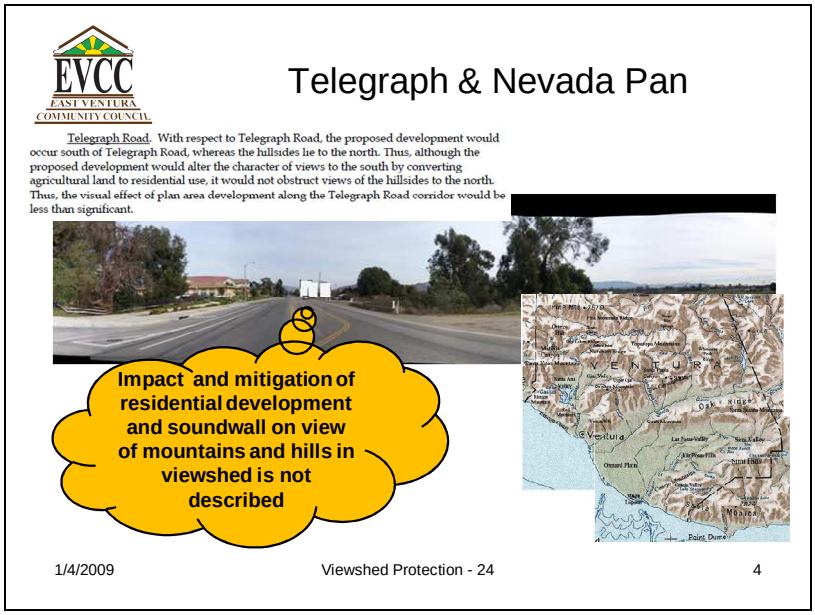
Views of the hills and mountains to the north and east from eastbound Hwy 126 will be obscured.

Views of the hills to the north and west from westbound Hwy 126 will be obscured.

The adverse impact of the soundwall on views of the hills and mountains south and east of the proposed project from a vantage point north of the soundwall is not addressed.

The combination of obscuring the views of the hills and mountains and replacement of the views with a monolithic structure is considered to be a significant impact.

Slide 4



10.52

Description of the visual impact of the proposed development on views from Telegraph Road is incomplete.

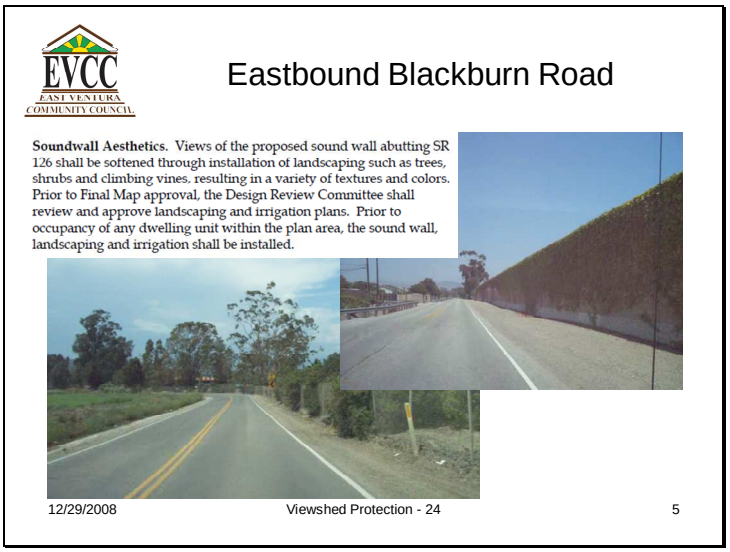
Views of the hills and mountains to the east and south from eastbound Telephone Road will be obscured.

The visual impact and effect of replacing agricultural land with high-rise residential development is not described.

The visual impact and effect of replacing agricultural land with high-rise residential development is considered significant.

Justification of determining the impact to be less than significant is unsubstantiated.

Slide 5

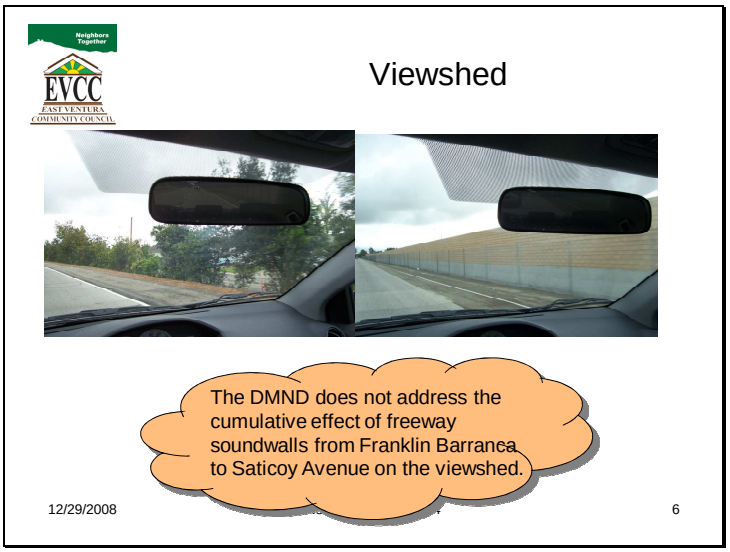


10.52

The EIR does not identify the visual impact of placing a soundwall on Blackburn Road.

•The visual effect of replacing views of hills and mountains to the east and south of the proposed project with a monolithic structure is not described.

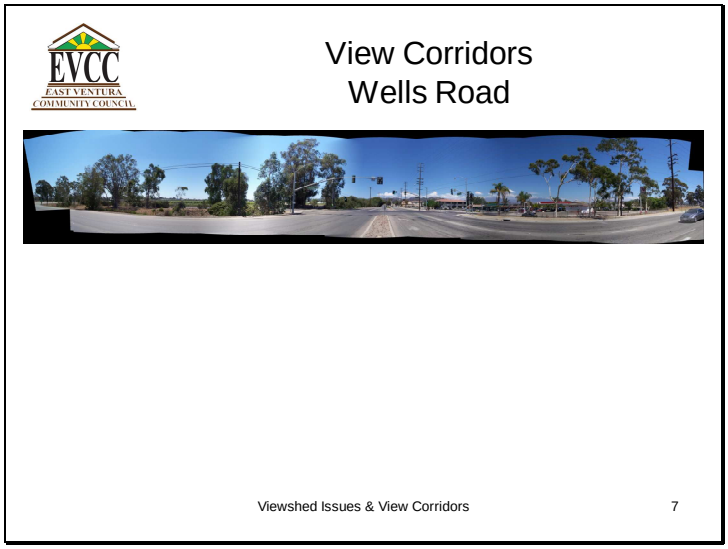
Slide 6



10.52

The EIR does not address the cumulative effect of freeway soundwalls from Franklin Barranca to Saticoy Avenue on the viewshed.

Slide 7



10.52

The visual impact of the proposed residential development on views looking north from Wells Road are not adequately described.

Slide 8

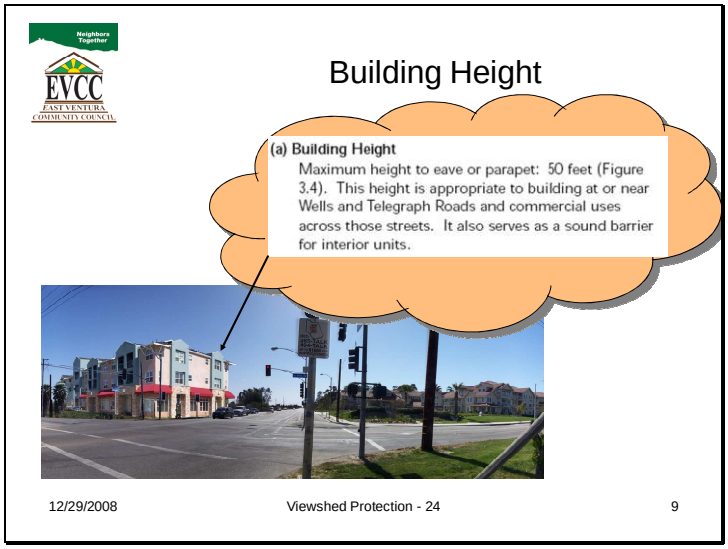
View Corridors
Wells Road

Wells Road. Wells Road is in the eastern part of the City and runs between the hills to the north and SR 126. This road provides views of the hills and agriculture areas on the east side of the road at the base of the hills.

Viewshed Issues & View Corridors 8

10.52

Slide 9



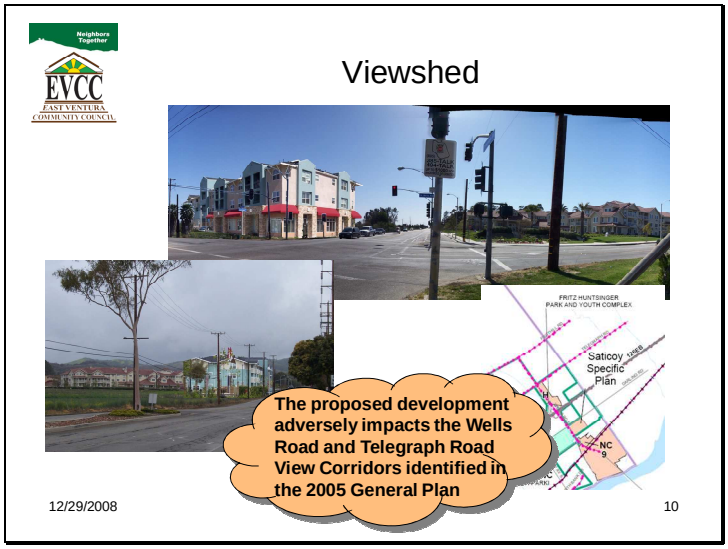
10.52

The EIR does not describe the visual impact of high rise buildings along Telegraph or Wells Roads.

•Building heights are incompatible with neighborhood and view corridors specified in the 2005 General Plan.

•Parklands Specific Plan, Page 3:8

Slide 10



10.52

The proposed development adversely impacts the Wells Road and Telegraph Road View Corridors identified in the 2005 General Plan.

Slide 11

10.52

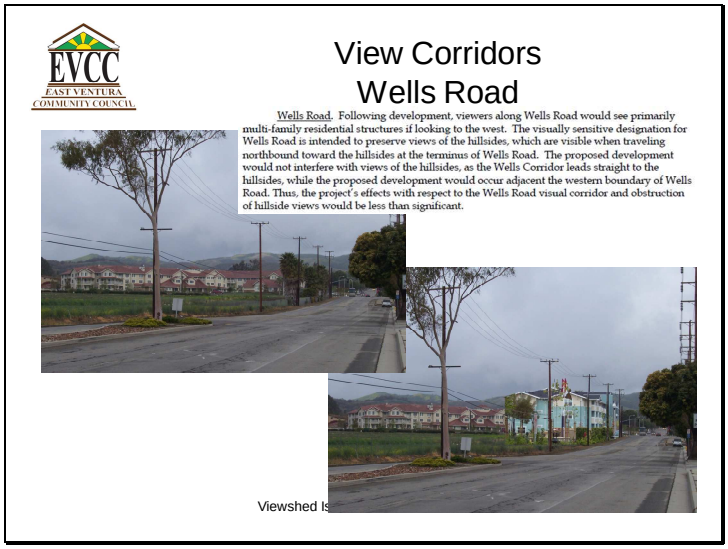
Wells & Telegraph Looking Southwest
•Chapel Lane Senior Housing scaled to the height of a 50 foot building and placed at the corner of Wells & Telegraph.

Slide 12

10.52

Wells & Telegraph Looking Southwest
•Chapel Lane Senior Housing scaled to the height of a 50 foot building and placed at the corner of Wells & Telegraph.

Slide 13



10.52

The proposed residential development significantly impacts the westerly and northerly view of the hills from Wells Road.

There is not justification or substantiation of the decision to class the environmental impact as lett than significant.

Slide 14

10.52

The proposed residential development significantly impacts the westerly and southerly view of the hills to the south from Wells Road.

This EIR impact is not described.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.53

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or cumulative effect of residential developments on the subject area of concern.

Design Guidelines Typical 30 foot Wide Neighborhood Yield Street allows a maximum of 14.0 feet when parking is allowed on both sides of the streetwhich is in violation of the 2007 California Fire Code Minimum Street Width Street clearance of 20 feet when parking is allowed on both sides of the street.

A minimum street width of 36 feet is required in order to comply with the 2007 California Fire Code Minimum Street Width Street clearance of 20 feet when parking is allowed on both sides of the street.

Interference from opposing traffic which may prevent or delay Fire Apparatus from reaching destination is not addressed in the EIR. 10.54

The inability of emergency vehicles to pass each other thereby creating operational problems for medical emergencies is not addressed.

Curved streets having no line of sight between intersections and preventing emergency apparatus from observing oncoming vehicles is not addressed.

Increase in emergency response time is not addressed in the EIR.

Proposed modifications to resolve practical difficulties in the California Fire Code have not been justified.

Hazards to emergency personnel created by Parkway Swale Hazards are not addressed.

Additional response time created by implementing staging areas decreases chance of survival in of full cardiac arrest incidents.

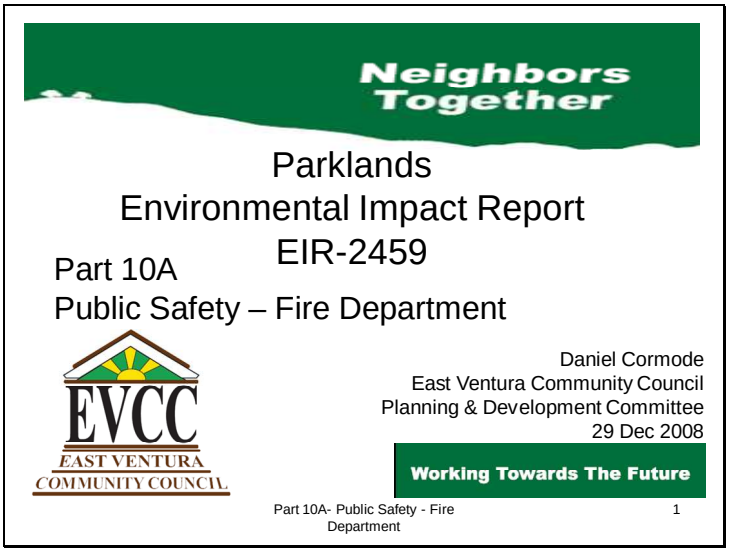
10.54

Project design elements which are not conducive to fire and rescue activities have not been addressed in the EIR.

Mitigation measures are not proposed for 95% of the fire department incidents in the EIR.

The above statements are substantiated by information contained in the attached slides.

Slide 1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Part 10A
Public Safety – Fire Department
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
29 Dec 2008
Working Towards The Future
Part 10A- Public Safety - Fire Department
1

10.54

Slide 2

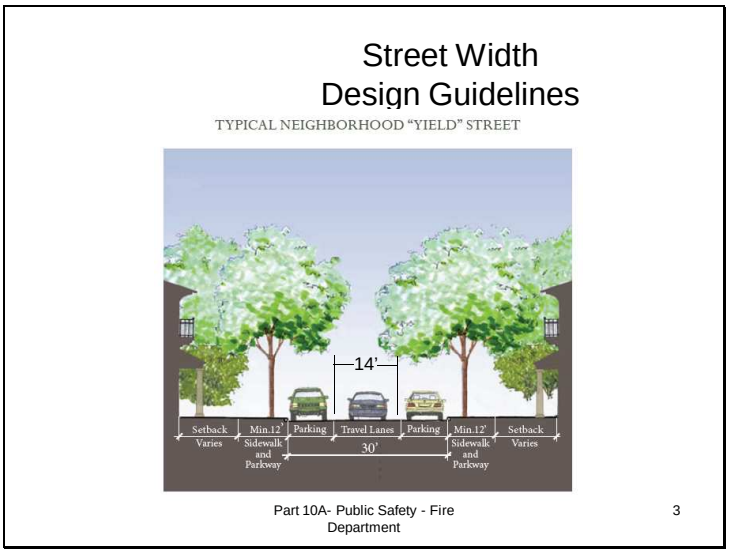
Public Safety – Fire Department

- Non-Compliance with Street Width Guidelines
- New Urbanism & Emergency Response Time
- Changes to incident rate.
- Cumulative Response Time
- Comprehensive Plan Update Background Report
- Concerns
- Issues
- Incident Rate

Part 10A- Public Safety - Fire Department 2

10.54

Slide 3

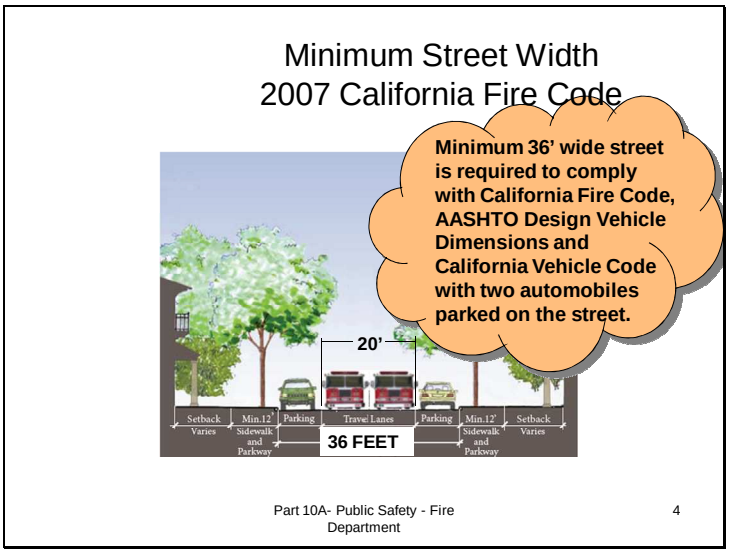


10.54

Design Guidelines Typical 30 ' Wide Neighborhood Yield Street allow a maximum of 14.0 feet when parking is allowed on both sides of the street.

- Maximum Distance From Curb 1.5 feet
- Width from Curb Side Wheel to Street Side of Automobile 6.5 feet
- Clearance Between Parked Automobiles **14.0 feet**
- Width from Curb Side Wheel to Street Side of Automobile 6.5 feet
- Maximum Distance From Curb 1.5 feet
- ----------
- 30.0 feet

Slide 4



10.54

A minimum street width of 36 feet is required in order to comply with the 2007 California Fire Code Minimum Street Width Street clearance of 20 feet when parking is allowed on both sides of the street.

• Maximum Distance From Curb	1.5 feet
• Width from Curb Side Wheel to Street Side of Automobile	6.5 feet
• Clearance Between Parked Automobiles	**20.0** feet
• Width from Curb Side Wheel to Street Side of Automobile	6.5 feet
• Maximum Distance From Curb	1.5 feet
•	---
•	36.0 feet
•	

•MINIMUM WIDTH FOR FIRE APPARATUS ACCESS ROADS. 503.2.1 **Dimensions**. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm).[1]

•STANDARD PASSENGER CAR DIMENSIONS. [2]

•The standard width for a Passenger Car is 7 feet.

•The standard width between the wheels of a Passenger Car is 6 feet.

•CALIFORNIA VEHICLE CODE – PARKING. 22502. (a) Except as otherwise provided in this chapter every vehicle stopped or parked upon a roadway where there are adjacent curbs shall be stopped or parked with the right-hand wheels of such vehicle parallel with and within 18 inches of the right-hand curb, except that motorcycles shall be parked with at least one wheel or fender touching the right-hand curb. Where no curbs or barriers bound any roadway, right-hand parallel parking is required unless otherwise indicated.[3]

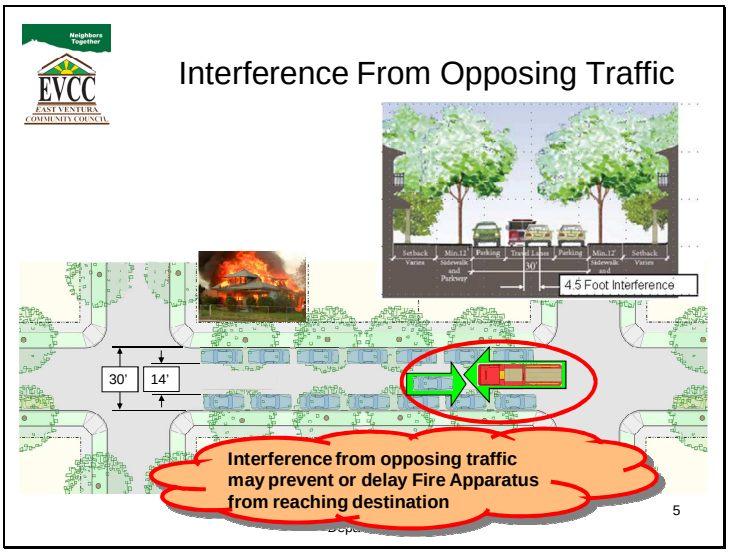
---

[1] 2007 California Fire Code, Chapter 5 FIRE SERVICE FEATURES

[2] AASHTO Design Vehicle Dimensions.

[3] 2008 California Vehicle Code

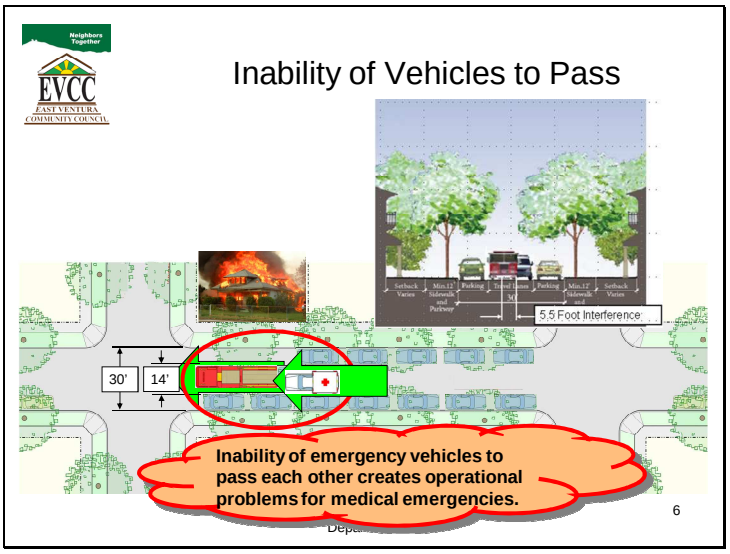
Slide 5



10.54

Interference from opposing traffic may prevent or delay Fire Apparatus from reaching destination.

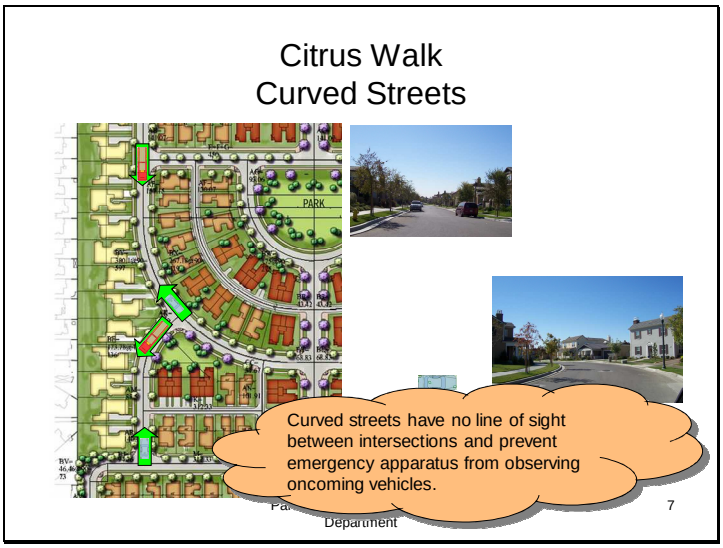
Slide 6



10.54

The inability of emergency vehicles to pass each other thereby creating operational problems for medical emergencies is not addressed.

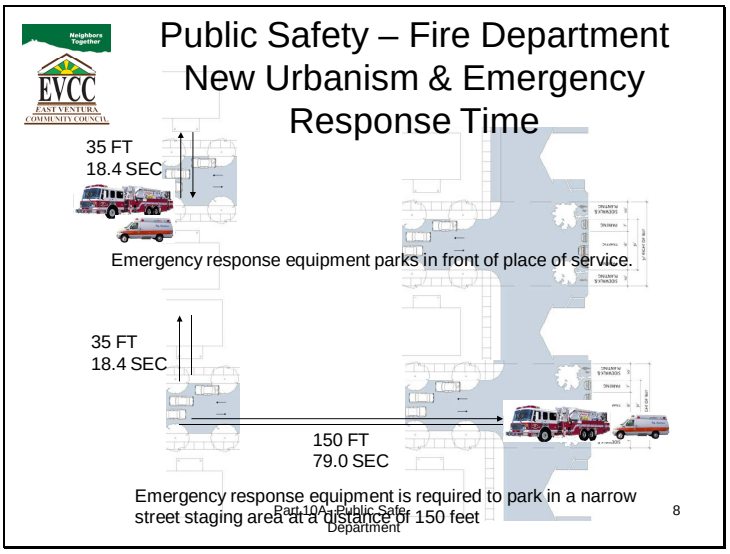
Slide 7



10.54

Curved streets having no line of sight between intersections and preventing emergency apparatus from observing oncoming vehicles is not addressed.

Slide 8



10.54

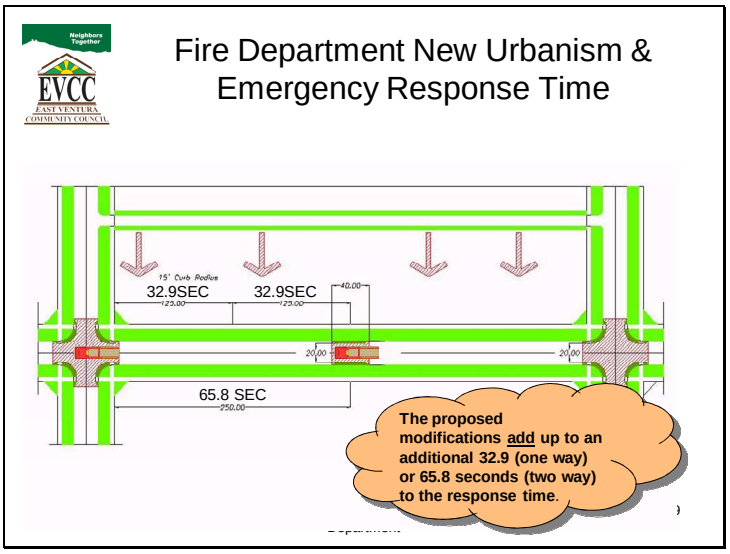
Increase in total elapsed time for emergency response violates Section 104.8 of the California Fire Code. Total elapsed time for an emergency response **increases by 79.0 seconds** when emergency response equipment is required to park in a narrow street staging area at a distance of 150 feet when walking at a normal speed of 3.8 feet per second.

While sprinklered buildings may retard the progression of a fire, there are 14 times more calls for medical emergencies than fires

Proposed mitigation measures to not apply to most calls for service.

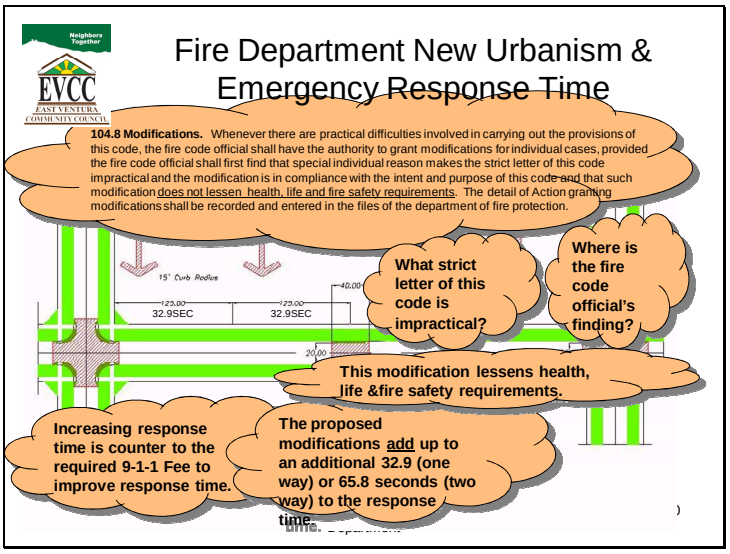
> **104.8 Modifications.** Whenever there are practical difficulties involved in carrying out the provisions of this code, the fire code official shall have the authority to grant modifications for individual cases, provided the fire code official shall first find that special individual reason makes the strict letter of this code impractical and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements. The detail of Action granting modifications shall be recorded and entered in the files of the department of fire protection.

Slide 9


Fire Department New Urbanism & Emergency Response Time
EVCC
EAST VENTURA COMMUNITY COUNCIL
15' Curb Radius
32.9SEC
32.9SEC
125.00
125.00
40.00
20.00
20.00
65.8 SEC
250.00
The proposed modifications add up to an additional 32.9 (one way) or 65.8 seconds (two way) to the response time.

10.54

Slide 10



10.54

Proposed modifications to resolve practical difficulties in the California Fire Code have not been justified:

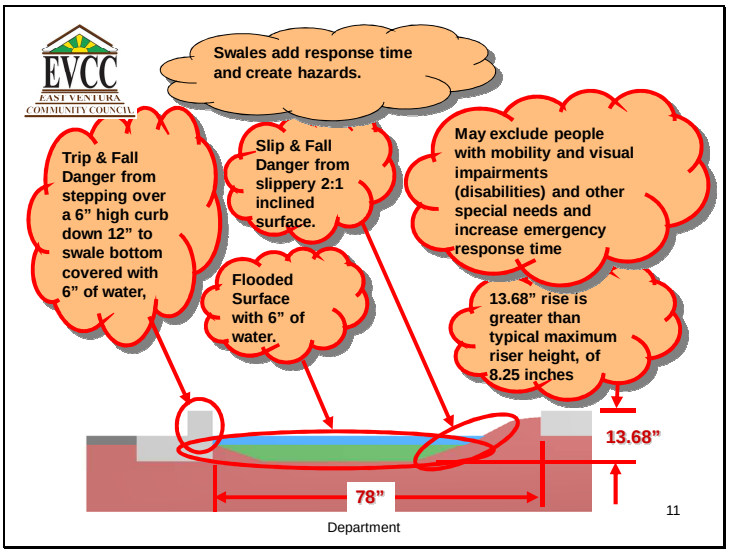
Strict letters for the fire code which present practical difficulties have not been identified.

No findings have been presented by the fire officials.

Proposed modifications lessen health, life and fire safety requirements.

Increasing response time is counter to the required 9-1-1- Fee which was enacted to improve response time.

Slide 11

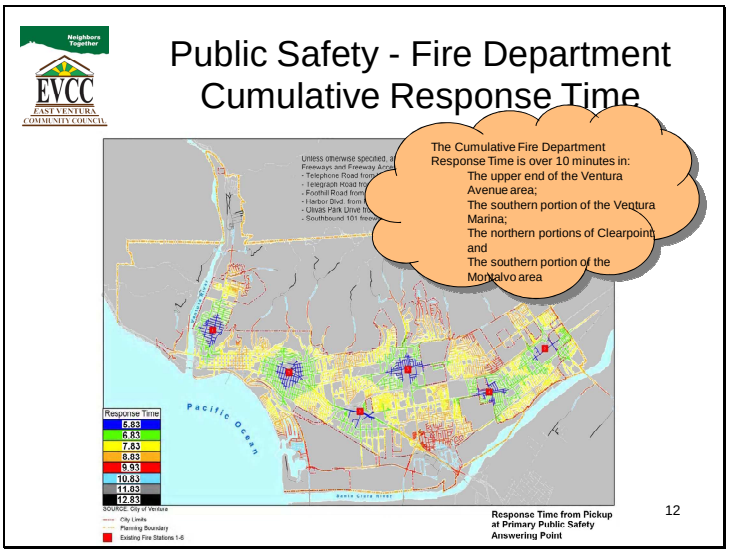


10.54

Hazards to emergency personnel created by Parkway Swale Hazards:

Trip & Fall Danger from stepping over a 6" high curb down 12" to deep swale covered with 6" of water
Flooded Surface with 6" of water.
Slip & Fall Danger from slippery inclined surface.
13.68" rise is greater than typical maximum riser height, of 8.25 inches
May exclude people with mobility and visual impairments (disabilities) and other special needs
May increase emergency response time and have a negative effect on ability to respond to medical emergencies.

Slide 12



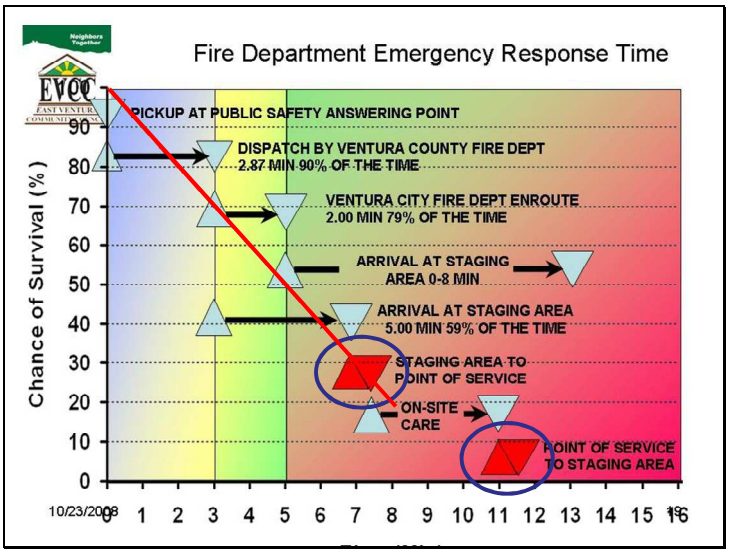
10.54

Cumulative Fire Department Response Time

The Cumulative Fire Department Response Time is over 10 minutes in:

- The upper end of the Ventura Avenue area;
- The southern portion of the Ventura Marina;
- The northern portions of Clearpoint; and
- The southern portion of the Montalvo area.

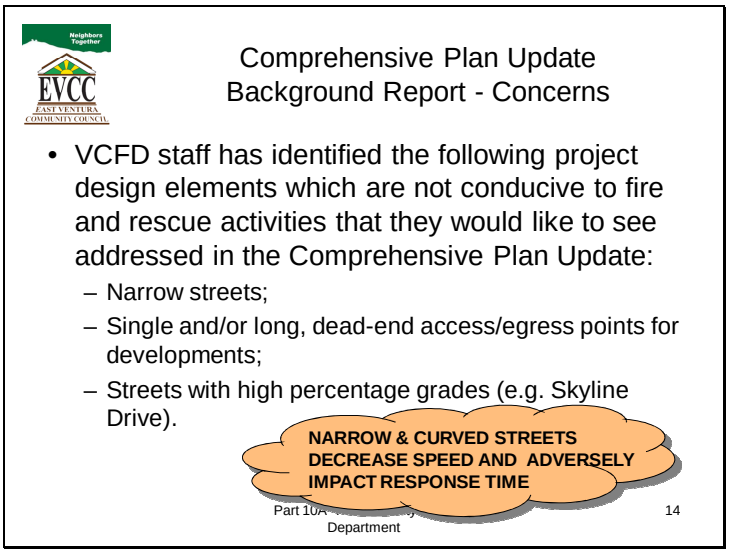
Slide 13



10.54

Additional response time created by implementing staging areas decreases chance of survival in of full cardiac arrest incidents.

Slide 14



10.54

Comprehensive Plan Update Background Report

The Ventura City Fire Department identified the following project design elements which are not conducive to fire and rescue activities that they would like to see addressed in the Comprehensive Plan Update:

Narrow streets;
Single and/or long, dead-end access/egress points for developments;
Streets with high percentage grades (e.g. Skyline Drive).

Instead of addressing those issues, especially narrow streets, the recently adopted General Plan Design Guidelines for narrow 30 foot wide streets which will have a negative impacting on reducing response time.

Slide 15

Comprehensive Plan Update Background Report - Issues

Table VIII-4. Fire Department Response Times, 2002

City	Response Time
Ventura	4 minutes, 51 seconds
Santa Barbara	4 minutes, 8 seconds
Oxnard	4 minutes, 38 seconds

Source: Ventura City Fire Dep[illegible] Fire Department, and Oxn[illegible]

With exception of a few cases, the Comprehensive Plan Update Background Report did not report any issues pertaining to response time.

Part 10A- Public S[illegible] Department

15

10.54

With exception of a few cases, the Comprehensive Plan Update Background Report did not report any issues pertaining to response time.

Slide 16

Comprehensive Plan Update Background Report

Table VIII-3. Fire Department Service Ratios, 2001

Agency	Firefighters per 1,000 residents
Ventura City Fire	0.7
Santa Barbara City Fire	1.2
Oxnard City Fire	0.5

Sources: Cities of Ventura, Santa Barbara, and Oxnard Fire Departments

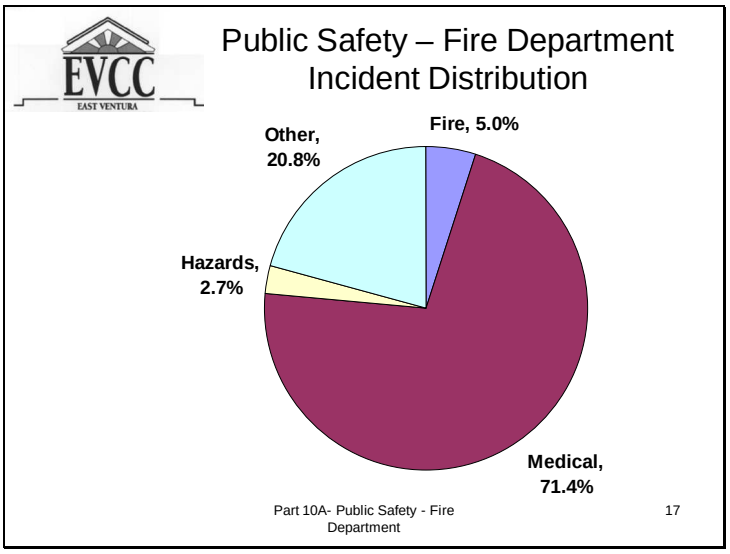
The Comprehensive Plan Update Background Report did not report any issues pertaining to current staffing ratios.

16

10.54

The Comprehensive Plan Update Background Report did not report any issues pertaining to current staffing ratios.

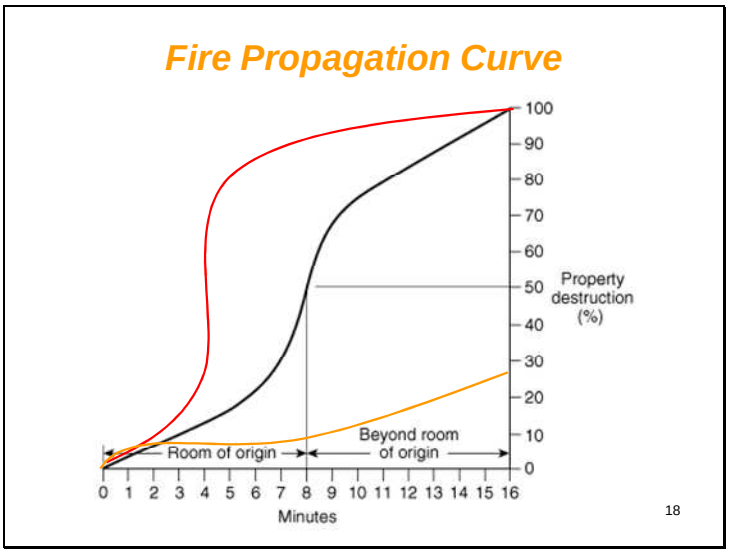
Slide 17



Distribution of Incidents	
Medical	71.4%
Fire	5.0%
Hazards	2.7%
Other	20.8%

10.54

Slide 18



10.54

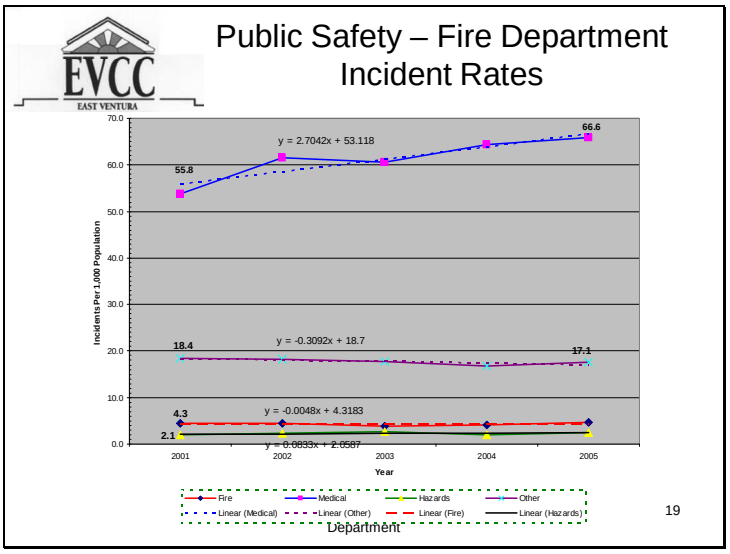
No mitigation measures proposed for 95% of the fire department incidents.

Responses to medical emergencies constitute 71.4% of the fire department incidents which may be adversely impacted by additional response time created by narrow streets, for which no mitigation measures are proposed.

Additional fire sprinklers may delay the propagation of a fire and mitigate any additional response time created by narrow streets and staging areas in response to fires.[4]

[4] Source: City of Ventura, Mobility Plan Meeting – Emergency Response

Slide 19



10.54

Medical Incidents are increasing at a rate of 2.704 incidents per 1,000 population per year.
Hazardous Material Incidents are increasing at a rate of 0.003 incidents per 1,000 population per year.
Other Incidents are decreasing at a rate of -0.309 per 1,000 population per year.
Fire Incidents are decreasing at a rate of -0.004 incidents per 1,000 population per year.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.55

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment or the cumulative impact of other proposed residential developments on the subject.

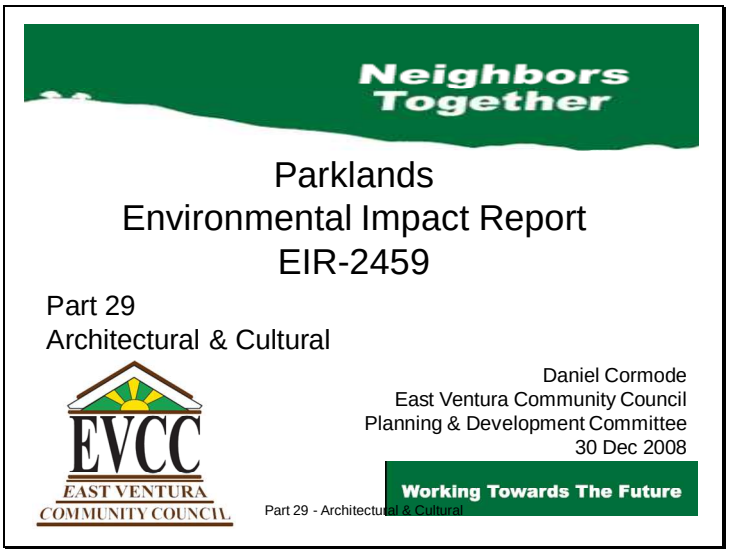
The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative effects of other proposed residential developments on the subject area of concern.

Architectural and Cultural research was incomplete and limited. 10.56

Search of Internet Web Sites revealed additional archaeological or cultural information.

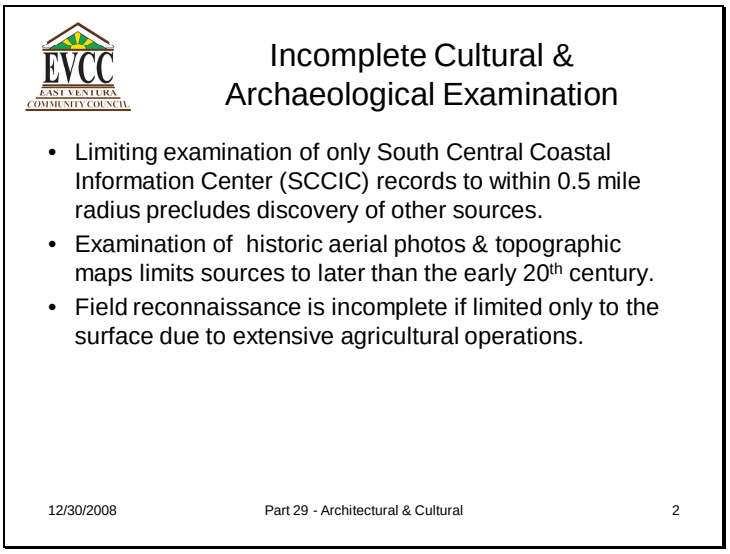
The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 29
Architectural & Cultural
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
30 Dec 2008
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Working Towards The Future
Part 29 - Architectural & Cultural

10.56

Slide 2



10.56

Architectural and Cultural research was incomplete and limited:

- Examination was limited to South Central Coast Information Center records within 0.5 mile radius of proposed residential development site.
- Photographic and topographic examination limited to 20th century sources.
- Field examination limited to surface examination.
- Additional data sources identified by DMND not investigated.

Search of Internet Web Sites revealed additional archaeological or cultural information including: includes:

- A Chumash Memorial is planned within1 mile of the residential project site,
- Until **the last twenty years**, the chieftainess, Pomposa, and a number of the tribe, were still living at these springs, and the early settlers tell how, even after their advent, here were wont to gather annually the remnants of the various tribes of Southern California.[1]
- Pomposa, an influential woman from Saticoy, was related through her grandfather to the ancient Muwu chieftainship; consequently, she was made chief in 1862.[2]
- In another attempt to retain Chumash traditional culture, the chieftain Pomposa gave the final Xutash Festival at the Saticoy home of her deceased father Luis Francisco, in the Autumn of 1869, ending what was a regular occurrence throughout the Chumash world, and described in detail in accounts about similar events at Ventura.[3]

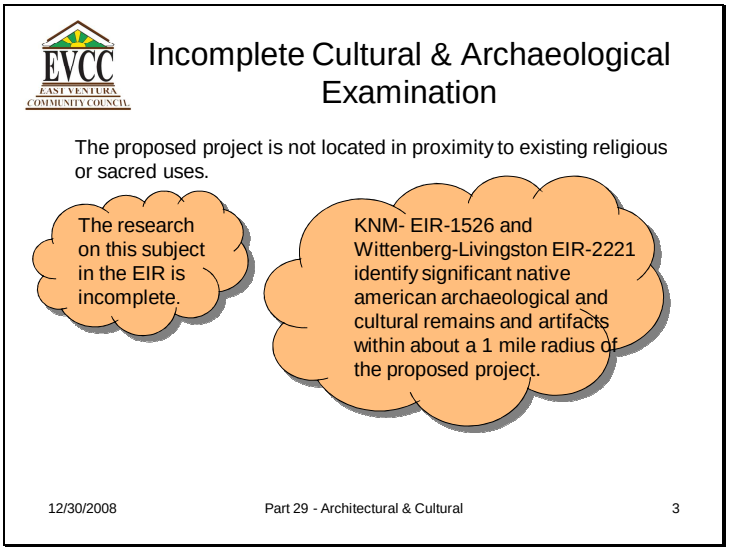
[1] Ventura County History, A Memorial and Biographical History of the Counties of Santa Barbara, San Luis Obispo, and Ventura, California by Yda Addis Storke, Published in 1891 by the Lewis Publishing Co., Pages 210-225

[2] From "Timoloqinash" in *The OCB Tracker*, by Michael Ward.

[3] From "Timoloqinash" in *The OCB Tracker*, by Michael Ward.

- By the early twentieth century, the Chumash had assimilated into mainstream American and Mexican-American Culture, and the language died out.[4]

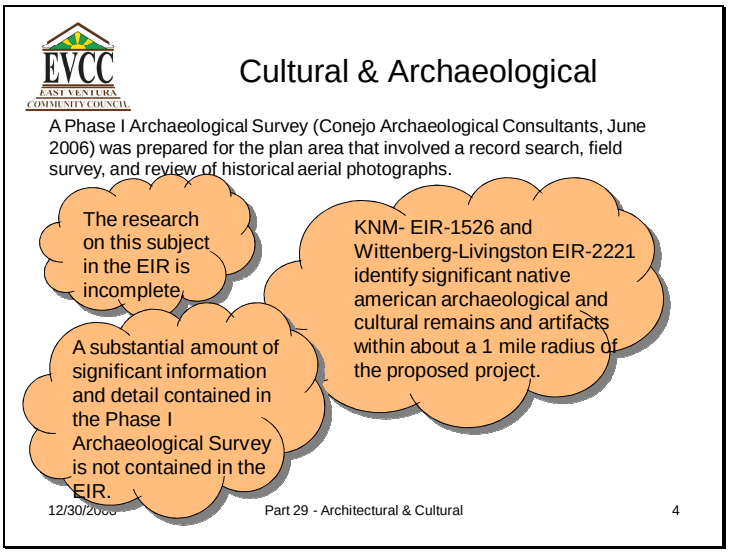
Slide 3



10.56

[4] From "Timoloqinash" in *The OCB Tracker*, by Michael Ward

Slide 4



10.56

The research on this subject in the EIR is incomplete.

KNM- EIR-1526 and Wittenberg-Livingston EIR-2221 both identify significant native american archaeological and cultural remains and artifacts within about a 1 mile radius of the proposed project.

Review of the soils pattern indicates Brown Barranca may have originally continued southeasterly toward Franklin-Wasson Barranca.

Recommend review of documentation held by Saticoy Historical Society, Ventura County Museum of History, 1927 and 1938 aerial photographs, title companies, tax assessor records, court records and other sources of historical data be researched to determine the archaeological and cultural history of the area in the vicinity of the proposed project.

Chapter 11
Parklands EIR-2459 Review Comments
- Drainage

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.57

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or identify the cumulative effect or proposed residential developments on the subject area of concern.

While increased flows due to residential development for Q100 and below storms are mitigated, the EIR does not identify or quantify the adverse impact of storms with intensities greater than Q100. 10.58

The magnitude or impact of the overflow from the Brown Barranca flowing easterly in the Hwy 126 Freeway culvert to the inlet of the Saticoy Drain and southerly over the Hwy 126 Freeway toward Darling Road and the Saticoy Drain is not discussed.

The Brown Barranca Floodplain investigation only analyzed the condition of Brown Barranca overtopping Wells Road north of Blackburn and did not include analysis of flow eastward from under the Wells Road Overcrossing 10.59

The latest revision of the FEMA Flood Insurance Rate Map is not referenced in the Parklands Brown Barranca Hydraulic Study

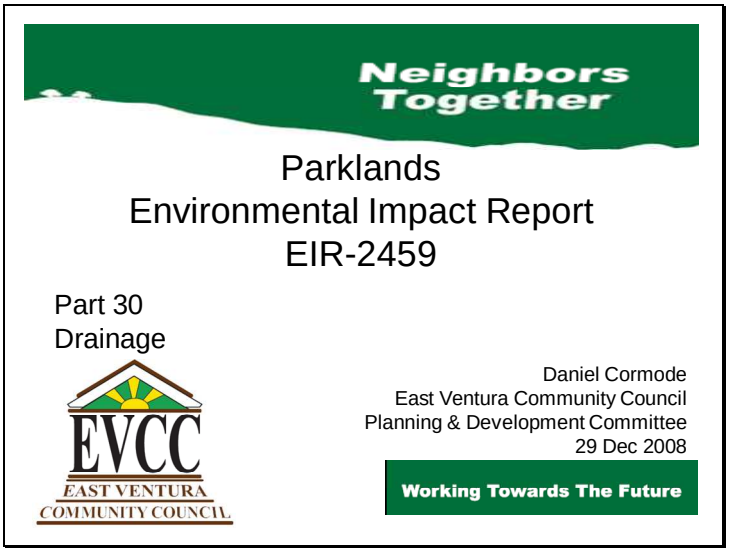
The proposed Brown Barranca project is to only upgrade the existing inadequate earth ditch. And upgrades to resolve other infrastructure issues to not appear to be either included in the proposed project or funded.

The EIR contains no studies or data to validate either the requirements or impact of the proposed storm water detention and other runoff reduction measures.

The relatively small difference between the inflow at Telegraph Road and and outflow at Hwy 126 brings into question that inflows from all reaches have been properly accounted. No flow vs time data is included in the EIR. 10.59

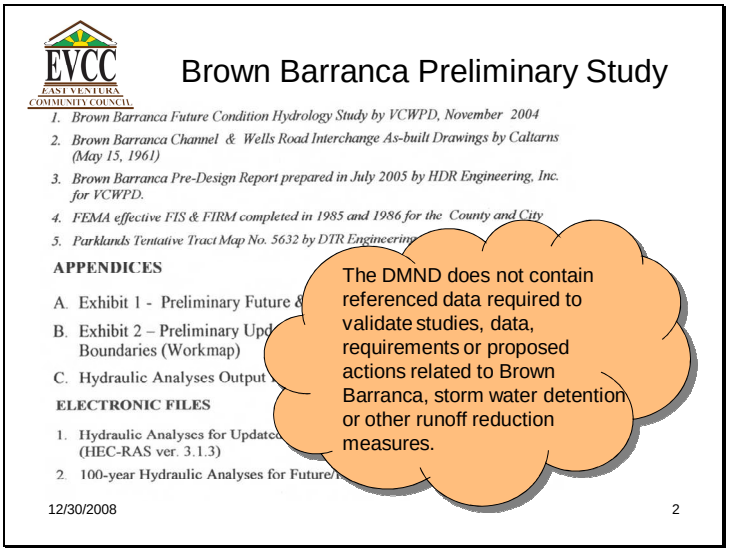
The above statements are substantiated by information contained in the attached slides

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 30
Drainage
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
29 Dec 2008
Working Towards The Future

10.59

Slide 2

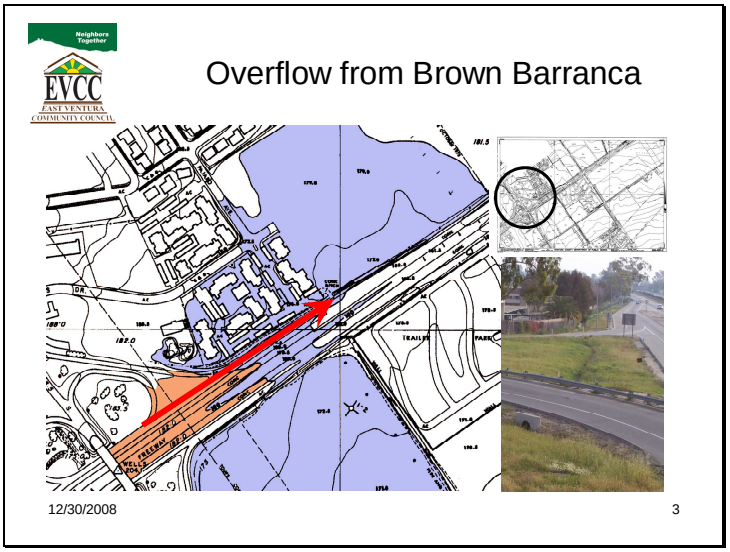


10.59

The EIR does not contain referenced data required to validate studies, data, requirements or proposed actions related to Brown Barranca, storm water detention or other runoff reduction measures.[1]

[1] Appendix F – Brown Barranca Preliminary Study

Slide 3



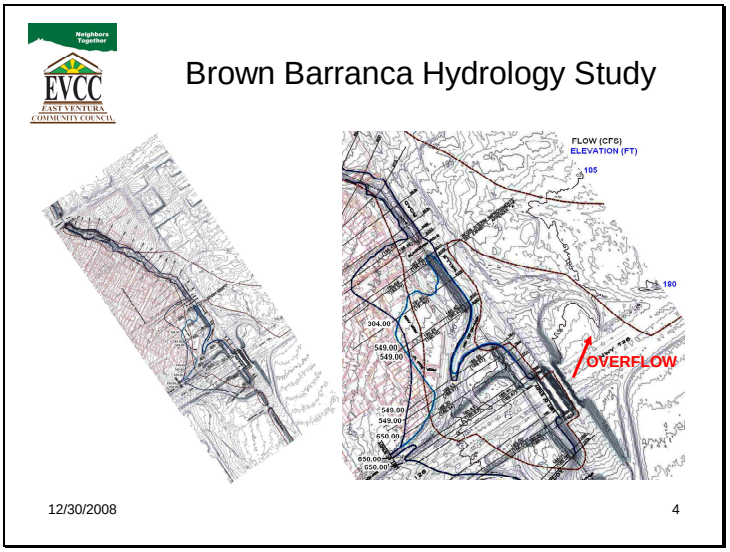
10.59

Overflow from the Brown Barranca flows easterly in the Hwy 126 Freeway culvert to the inlet of the Saticoy Drain and southerly over the Hwy 126 Freeway toward Darling Road and the Saticoy Drain.

What is the magnitude of the impact of the overflow into the Saticoy Drain and the land south of the Hwy 126 Freeway?

What is the impact of If overflow exceeds the capacity of the Saticoy Drain and causing local flooding below the 180 foot elevation?

Slide 4



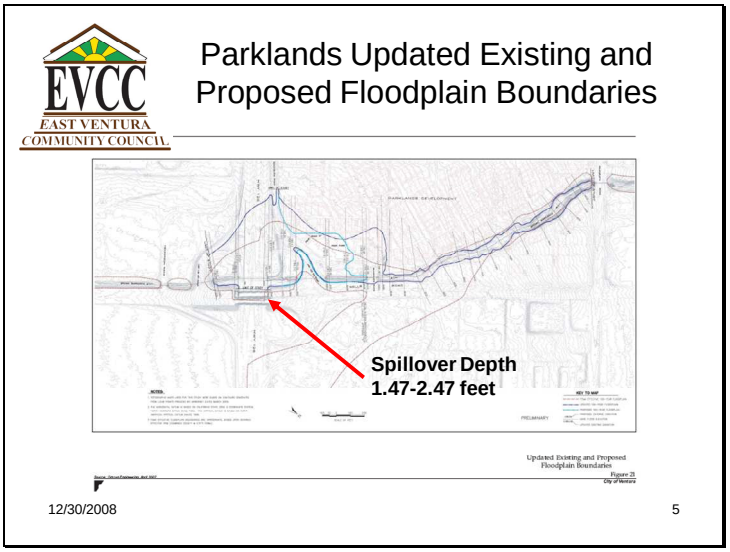
10.59

Depth of overflow is approximately 1.97 (185.47 – 183.50) feet at the eastern edge of the study area and flows eastward. What is the magnitude of the downstream impact?

Not shown in the topographic map is are height of the curbs along the southern edge of the westbound Wells Road access to the Hwy 126 Freeway which impedes the southerly flow of the overflow. What is the magnitude of the impact of the curbs on the overflow?

The Parklands Development Brown Barranca Preliminary Hydraulic Study of Dec 2006 is unclear if the 101.00 (650.00 – 549.00) cfs flow is from the Parklands Development or from the culvert along the north side of the Hwy 126 Freeway. What is the magnitude of the flow from the Parklands Development and the magnitude of the in the culvert along the north side of the Hwy 126 Freeway?

Slide 5

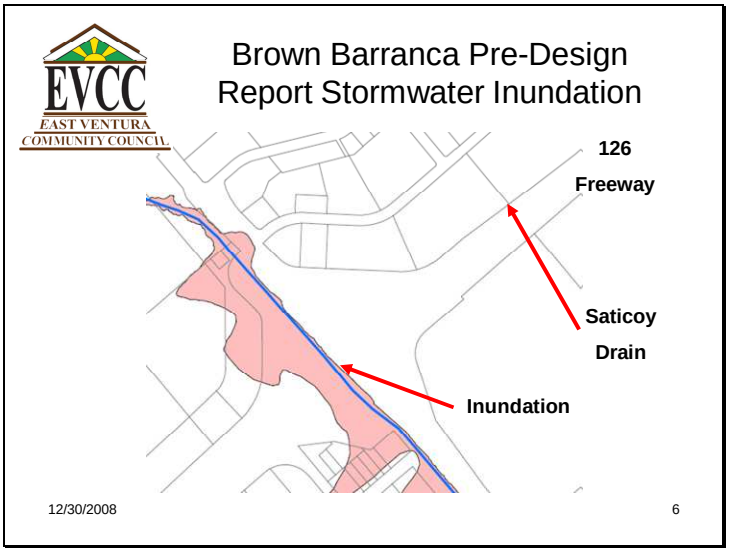


10.59

Parklands Updated Existing and Proposed Floodplain Boundaries

Updated Existing and Proposed Floodplain Boundaries dated April 2007 illustrates a flow depth of approximately 1.47 to 2.47 feet at the 126 Freeway.

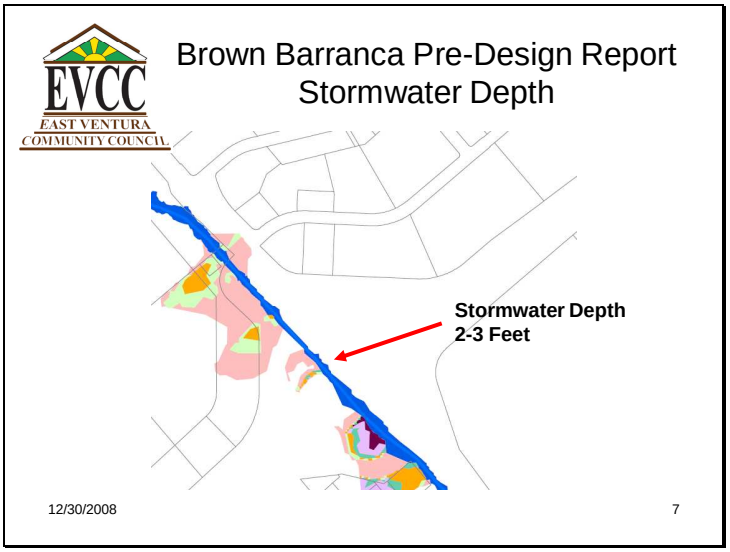
Slide 6



10.59

Figure 2 of the Brown Barranca Pre-Design Report, City of Ventura, Ventura County, California dated December 27, 2005 shows stormwater inundation area across the 126 Freeway.

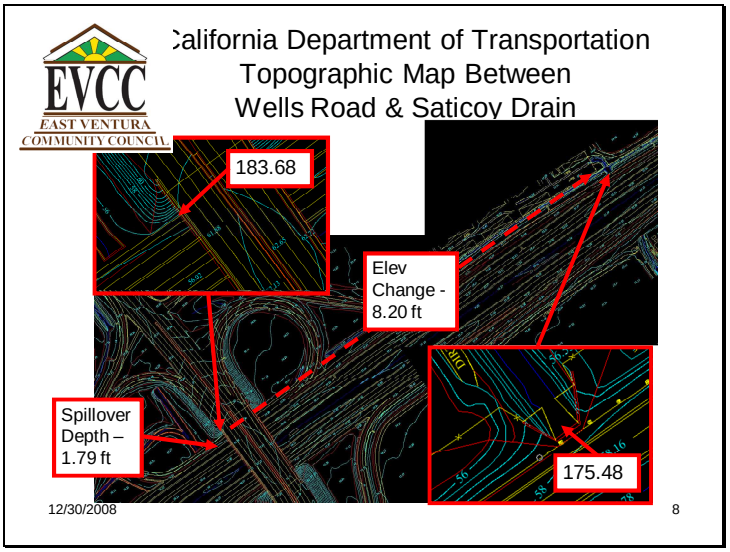
Slide 7



10.59

Figure 3 of the Brown Barranca Pre-Design Report, City of Ventura, Ventura County, California dated December 27, 2005 shows stormwater flow up to 3 feet deep at the 126 Freeway.

Slide 8



10.59

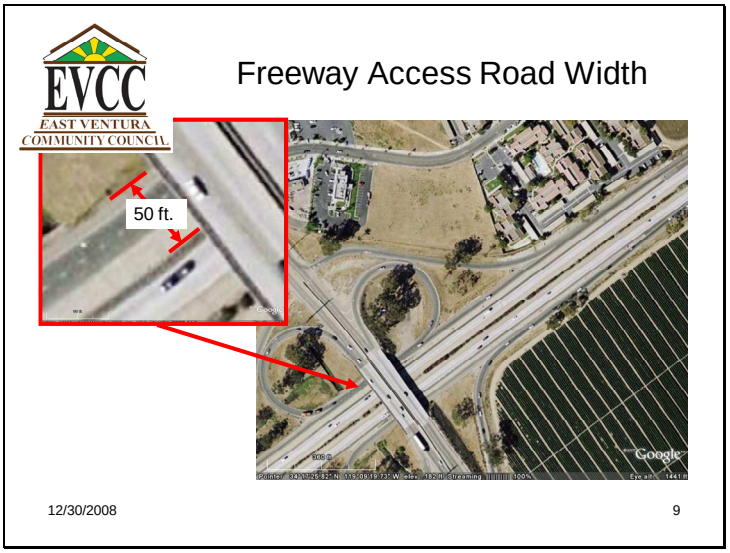
California Department of Transportation Topographic Map Between Wells Road & Saticoy Drain

The elevation difference between the spillover on the 126 Fwy at the Wells Road Overcrossing and the invert at the Saticoy Drain is 8.20 feet.

The depth of the spillover is 1.79 ft (185.47 – 183.68).

The Conversion Factor used is 3.28 feet per meter.

Slide 9



10.59

Freeway Access Road Width

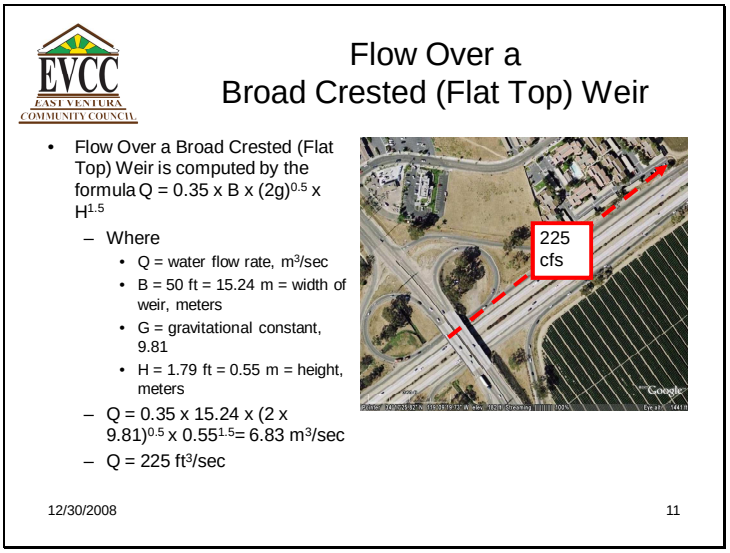
The width of the 126 Freeway Access Road at the Wells Road Overcrossing is 50 feet as measured using Google Earth.

Slide 10

10.59

Curb along the southern edge of the westbound Wells Road access to the Hwy 126 Freeway.

Slide 11



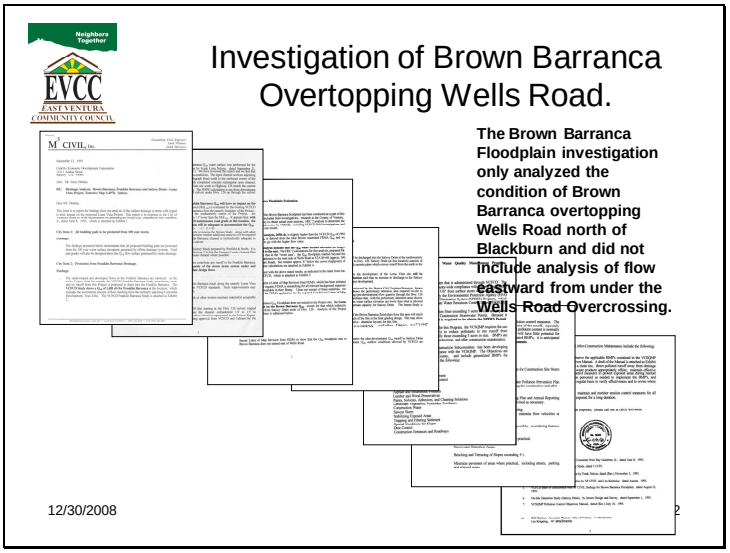
10.59

Flow Over a Broad Crested (Flat Top) Weir is computed by the formula $Q = 0.35 \times B \times (2g)^{0.5} \times H^{1.5}$

Where

Q = water flow rate, m^3/sec
B = 50 ft = 15.24 m = width of weir, meters
G = gravitational constant, 9.81
H = 1.79 ft = 0.55 m = height, meters
$Q = 0.35 \times 15.24 \times (2 \times 9.81)^{0.5} \times 0.55^{1.5} = 6.83$ m^3/sec
$Q = 225$ ft^3/sec

Slide 12



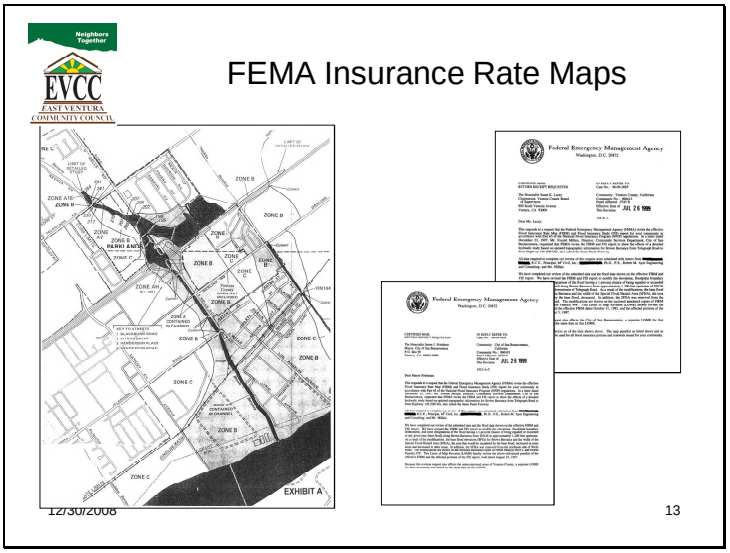
10.59

The Brown Barranca Floodplain investigation only analyzed the condition of Brown Barranca overtopping Wells Road north of Blackburn and did not include analysis of flow eastward from under the Wells Road Overcrossing.[2].

.

[2] See 3M Civil Letter dated 12 Sep 1995 and referenced attachments thereon

Slide 13



10.59

The latest revision of the FEMA Flood Insurance Rate Map is not referenced in the Parklands Brown Barranca Hydraulic Study

.

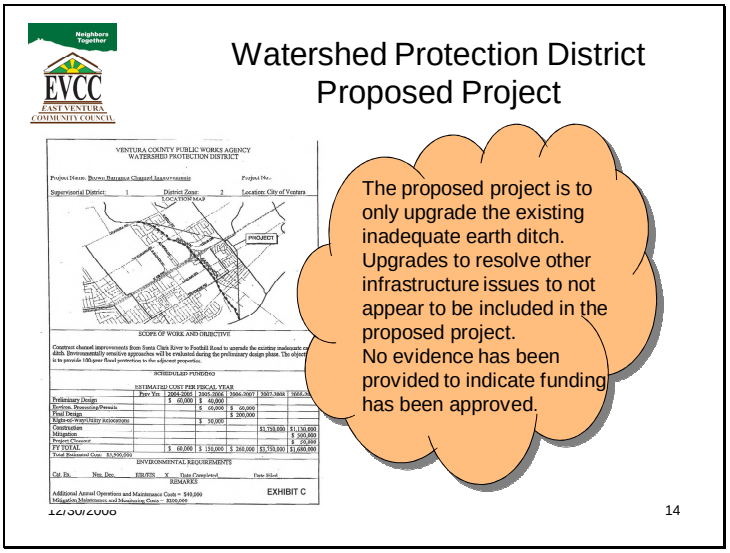
The FEMA Flood Insurance Rate Map has been superseded by changes LOMC 98-09-383P-060413P and LOMC 98-09-383P-060419P dated 26 Jul 1999 which are not listed.

The FEMA Flood Insurance Rate Map is in error as is does not show flow under the Hwy 126 Freeway Wells Road Overcrossing.

The City of San Buenaventura Community Services Department letter dated 23 Dec 1997 and supporting reports and documentation are not referenced in the Parklands Brown Barranca Hydraulic Study.

LOMC 98-09-383P-060413P dated 26 Jul 1999 and LOMC 98-09-383P-060419P dated 26 Jul 1999 were issued based on incomplete information.

Slide 14



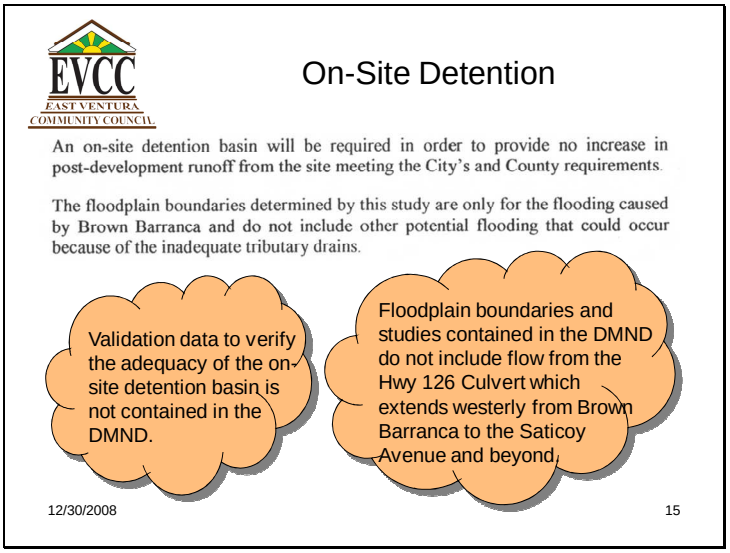
10.59

The proposed project is to only upgrade the existing inadequate earth ditch.

Upgrades to resolve other infrastructure issues to not appear to be included in the proposed project.

No evidence has been provided to indicate funding has been approved.

Slide 15

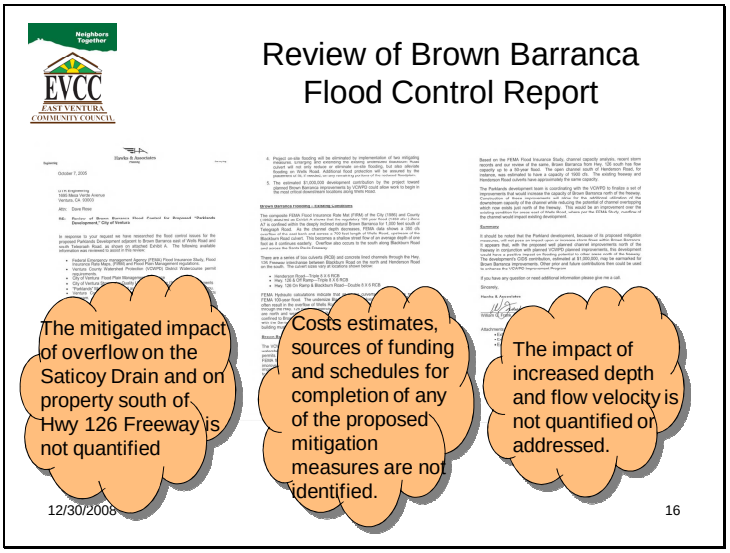


10.59

Validation data to verify the adequacy of the on-site detention basin is not contained in the EIR. Floodplain boundaries and studies contained in the EIR do not include flow from the Hwy 126 Culvert which extends westerly from Brown Barranca to the Saticoy Avenue and beyond.[3]

[3] Ref: Appendix F – Brown Barranca Preliminary Study

Slide 16



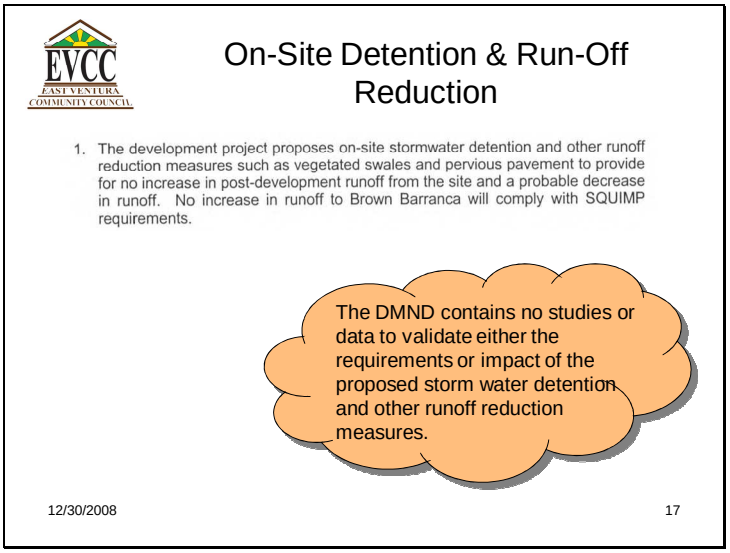
10.59

The impact of overflow on the Saticoy Drain and on property south of Hwy 126 Freeway is not quantified.

Costs estimates, sources of funding and schedules for completion of any of the proposed mitigation measures are not identified.

The impact of increased depth and flow velocity is not quantified or addressed.

Slide 17

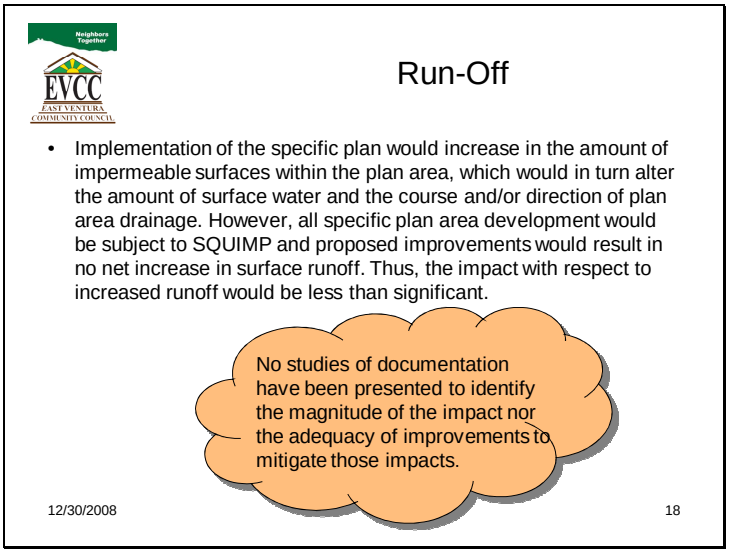


10.59

The EIR contains no studies or data to validate either the requirements or impact of the proposed storm water detention and other runoff reduction measures.[4]

[4] Reference: Hawks & Associates Letter dated 7 Oct 2005

Slide 18



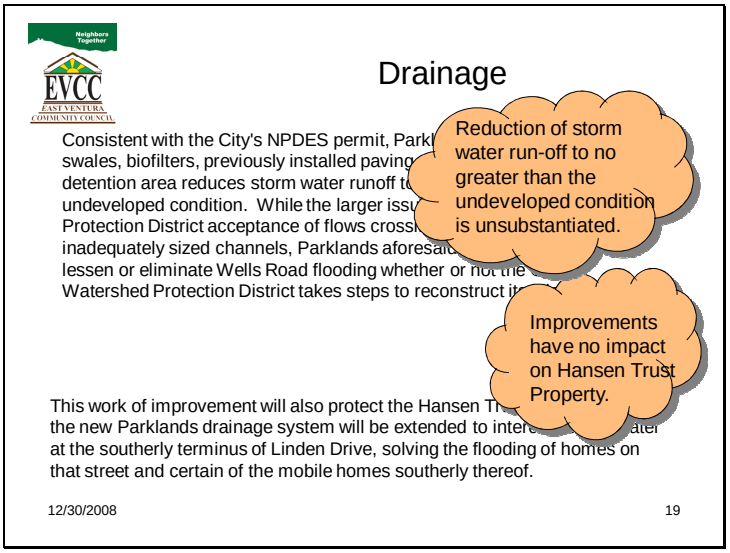
10.59

No studies of documentation have been presented to identify the magnitude of the impact nor the adequacy of improvements to mitigate those impacts.

Implementation of the specific plan would increase in the amount of impermeable surfaces within the plan area, which would in turn alter the amount of surface water and the course and/or direction of plan area drainage.

All specific plan area development would be subject to SQUIMP and proposed improvements would result no net increase in surface runoff.

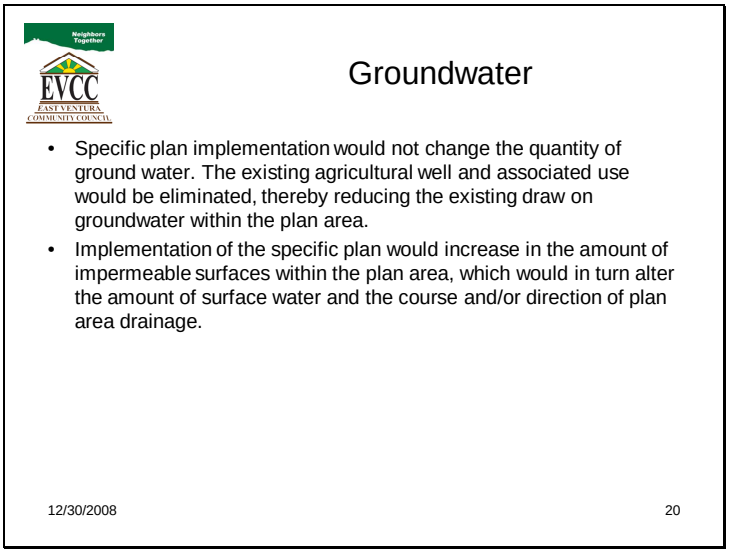
Slide 19



10.59

Page 4:18

Slide 20



10.60

Specific plan implementation would not change the quantity of ground water. The existing agricultural well and associated use would be eliminated, thereby reducing the existing draw on groundwater within the plan area.

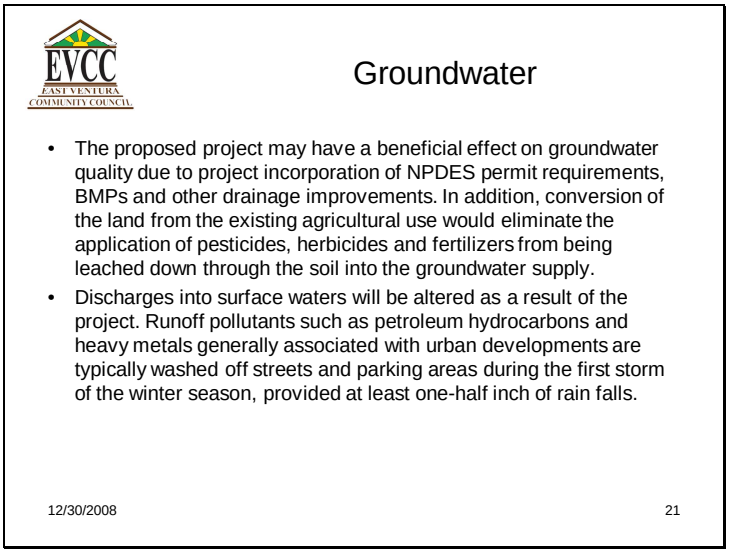
The change in land use from agriculture use to residential use will also impact the quantity of groundwater being drawn from the aquifers. The source of all domestic water in East Ventura is from water wells. The aquifers that those wells draw water from may not the same aquifer in which the agricultural well is located. Furthermore, the magnitude of the impact is not quantified.

Increase in the amount of impermeable surfaces within the plan area would also alter the amount of groundwater.

The net increase in the requirement for groundwater of 163 AFY is not discussed in the EIR[5]

[5] United Water Conservation District letter dated 25 Jul 2008.

Slide 21



10.61

The below statements are in conflict. The impact of pollutants such as petroleum hydrocarbons and heavy metals generally associated with urban developments being leached down into the soil is not identified or quantified.

The proposed project may have a beneficial effect on groundwater quality due to project incorporation of NPDES permit requirements, BMPs and other drainage improvements. In addition, conversion of the land from the existing agricultural use would eliminate the application of pesticides, herbicides and fertilizers from being leached down through the soil into the groundwater supply.

Discharges into surface waters will be altered as a result of the project. Runoff pollutants such as petroleum hydrocarbons and heavy metals generally associated with urban developments are typically washed off streets and parking areas during the first storm of the winter season, provided at least one-half inch of rain falls.

Slide 22

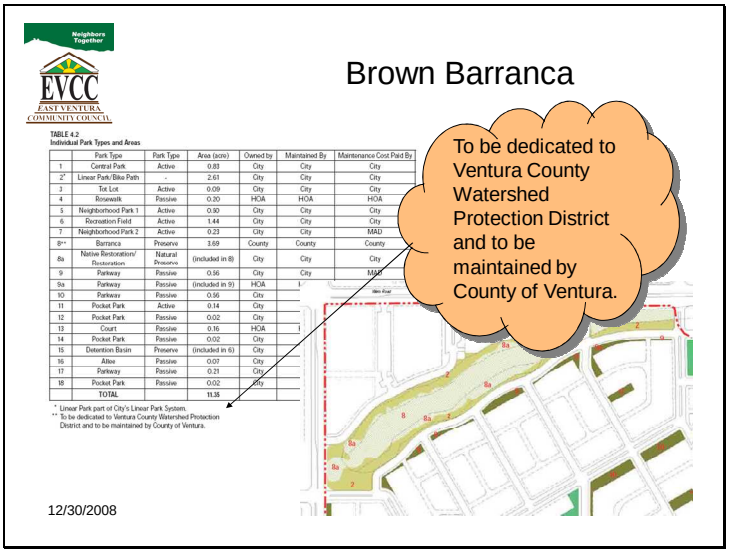


TABLE 4.2
Individual Park Types and Areas

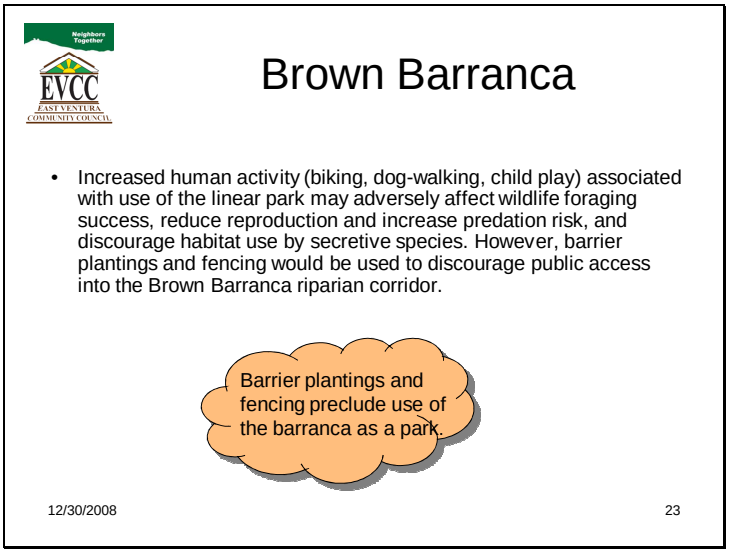
	Park Type	Park Type	Area (acre)	Owned by	Maintained By	Maintenance Cost Paid By
1	Central Park	Active	0.83	City	City	City
2*	Linear Park/Bike Path	-	2.61	City	City	City
3	Tot Lot	Active	0.09	City	City	City
4	Rosewalk	Passive	0.20	HOA	HOA	HOA
5	Neighborhood Park 1	Active	0.90	City	City	City
6	Recreation Field	Active	1.44	City	City	City
7	Neighborhood Park 2	Active	0.23	City	City	MAD
8**	Barranca	Preserve	3.69	County	County	County
8a	Native Restoration/ Restoration	Natural Preserve	(included in 8)	City	City	City
9	Parkway	Passive	0.56	City	City	MAD
9a	Parkway	Passive	(included in 9)	HOA	[illegible]	
10	Parkway	Passive	0.56	City		
11	Pocket Park	Active	0.14	City		
12	Pocket Park	Passive	0.02	City		
13	Court	Passive	0.16	HOA	[illegible]	
14	Pocket Park	Passive	0.02	City		
15	Detention Basin	Preserve	(included in 6)	City		
16	Alley	Passive	0.07	City		
17	Parkway	Passive	0.23	City		
18	Pocket Park	Passive	0.02	City		
	TOTAL		11.35			

* Linear Park part of City's Linear Park System.
** To be dedicated to Ventura County Watershed Protection District and to be maintained by County of Ventura.

10.62

Area cannot be counted as park area if use or access is restricted.
Ref: Page 4:22

Slide 23

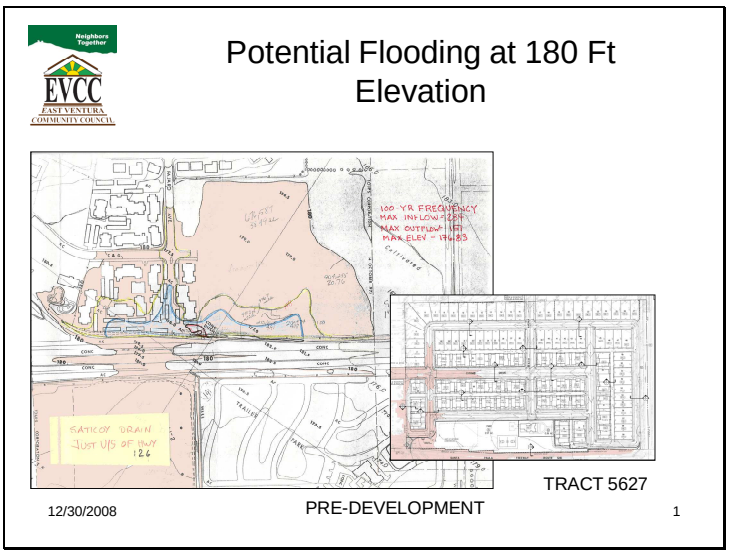


10.62

Increased human activity (biking, dog-walking, child play) associated with use of the linear park may adversely affect wildlife foraging success, reduce reproduction and increase predation risk, and discourage habitat use by secretive species.

However, barrier plantings and fencing would be used to discourage public access into the Brown Barranca riparian corridor which precludes consideration of Brown Barranca as a park.

Slide 24

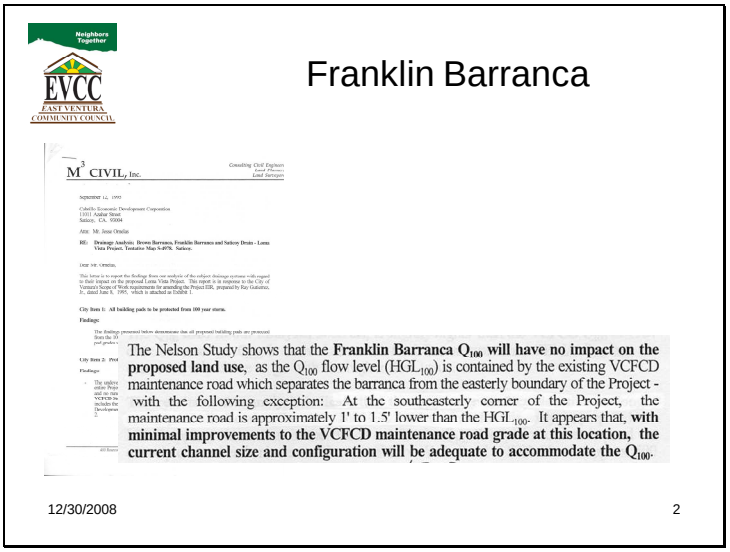


10.63

Comparison of areas for potential flooding at 180 foot elevation between pre-development and proposed Citrus Place TTM 5627 and Saticoy Drain Detention Area, developed by the Ventura County Flood Control District in November 1996.

Note the VCFCD has specified the maximum outflow into the Saticoy Drain as 151 cfs and there was no consideration of inflow from the Brown Barranca overflow.

Slide 25

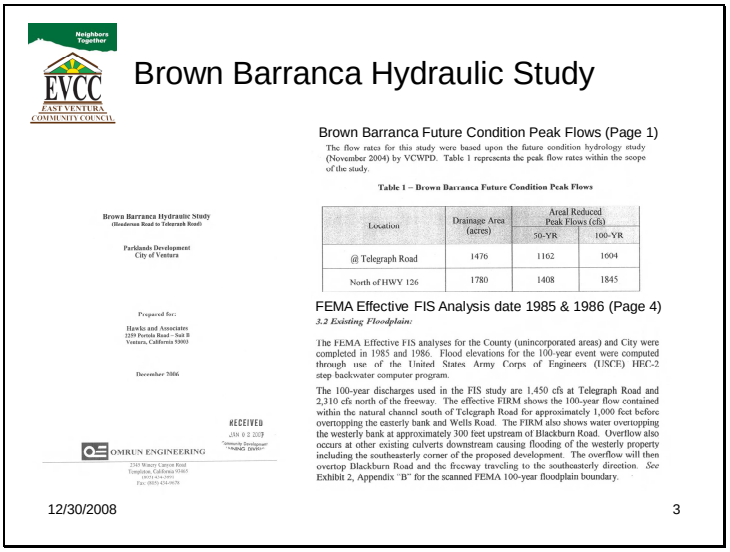


10.63

M3 Civil Letter dated 12 Sep 1995 states the level of the VCFCD Franklin Barranca maintenance road is 1' to 1.5' lower than the HGL100 upstream from the Hwy 126 Freeway.

This deficiency impacts both the Saticoy Drain, Citrus Drive Apartments and Citrus Place development.

Slide 26



Neighbors Together

EVCC
EAST VENTURA COMMUNITY COUNCIL

Brown Barranca Hydraulic Study

Brown Barranca Hydraulic Study
(Henderson Road to Telegraph Road)

Parklands Development
City of Ventura

Prepared for:

Hawks and Associates
2259 Portola Road – Suit B
Ventura, California 93003

December 2006

RECEIVED
JAN 0 2 2007
Community Development
"Making Ventura"

OMRUN ENGINEERING
2340 Winery Canyon Road
Templeton, California 93465
Phone: (805) 434-0676
Fax: (805) 434-0676

Brown Barranca Future Condition Peak Flows (Page 1)

The flow rates for this study were based upon the future condition hydrology study (November 2004) by VCWPD. Table 1 represents the peak flow rates within the scope of the study.

Table 1 – Brown Barranca Future Condition Peak Flows

Location	Drainage Area (acres)	Areal Reduced Peak Flows (cfs)	
		50-YR	100-YR
@ Telegraph Road	1476	1162	1604
North of HWY 126	1780	1408	1845

FEMA Effective FIS Analysis date 1985 & 1986 (Page 4)

3.2 Existing Floodplain:

The FEMA Effective FIS analyses for the County (unincorporated areas) and City were completed in 1985 and 1986. Flood elevations for the 100-year event were computed through use of the United States Army Corps of Engineers (USCE) HEC-2 step backwater computer program.

The 100-year discharges used in the FIS study are 1,450 cfs at Telegraph Road and 2,310 cfs north of the freeway. The effective FIRM shows the 100-year flow contained within the natural channel south of Telegraph Road for approximately 1,000 feet before overtopping the easterly bank and Wells Road. The FIRM also shows water overtopping the westerly bank at approximately 300 feet upstream of Blackburn Road. Overflow also occurs at other existing culverts downstream causing flooding of the westerly property including the southeasterly corner of the proposed development. The overflow will then overtop Blackburn Road and the freeway traveling to the southeasterly direction. *See* Exhibit 2, Appendix "B" for the scanned FEMA 100-year floodplain boundary.

12/30/2008 3

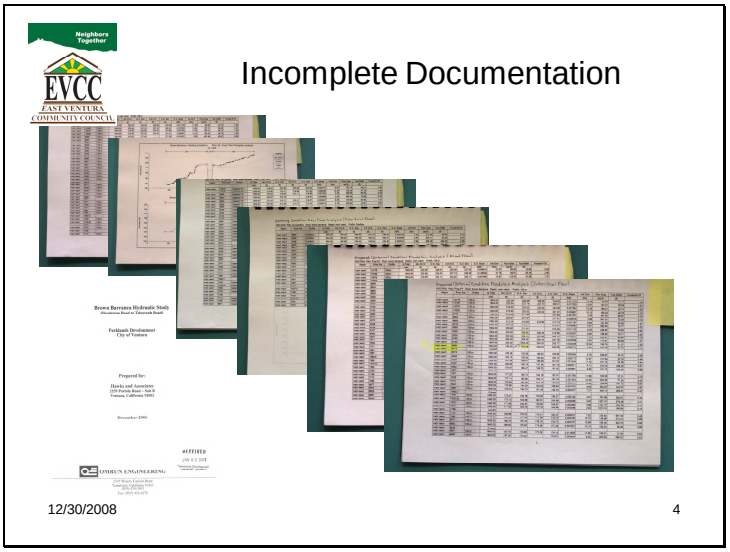
10.64

The Brown Barranca Future Condition Q100 Peak Flows of 1,604 and 1,845 for this study were based on the VCWPD Future Condition Hydrology Study dated Nov 2004.

The Existing Floodplain Q100 discharges of 1,450 and 2,310 were based on the FEMA Effective FIS Analysis for the County and City completed in 1985 and 1986.

What is the explanation for the range and magnitude of Telegraph Road and Hwy 126 future floodplain conditions (1,601 & 1,845) being different from the existing floodplain conditions (1,450 & 2,310)?

Slide 27

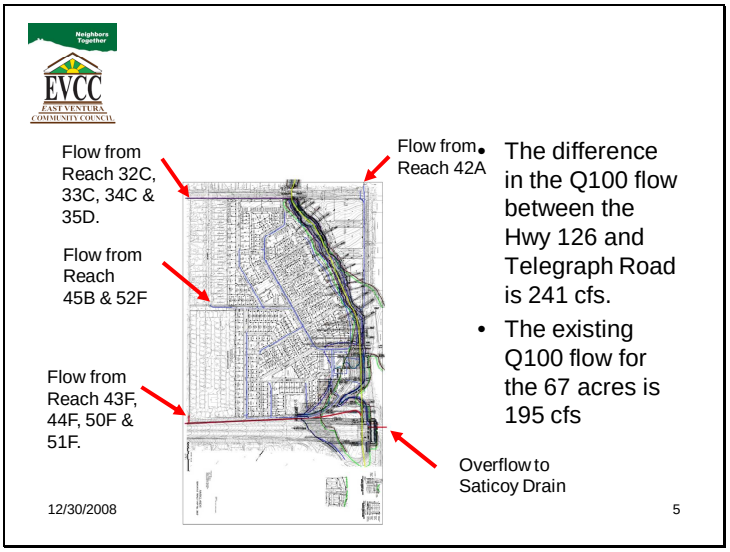


10.65

Deficiencies and errors in the flow data were identified as a result of a review of flow data contained in Appendix C of the Brown Barranca Hydraulic Study for Parklands Development by OMRON Engineering.

Brown Barranca Hydraulic Study for Parklands Development by OMRON Engineering dated December 2006 was included as Appendix F to the EIR without Appendix C of the Brown Barranca Hydraulic Study for Parklands Development by OMRON Engineering dated December 2006.

Slide 28



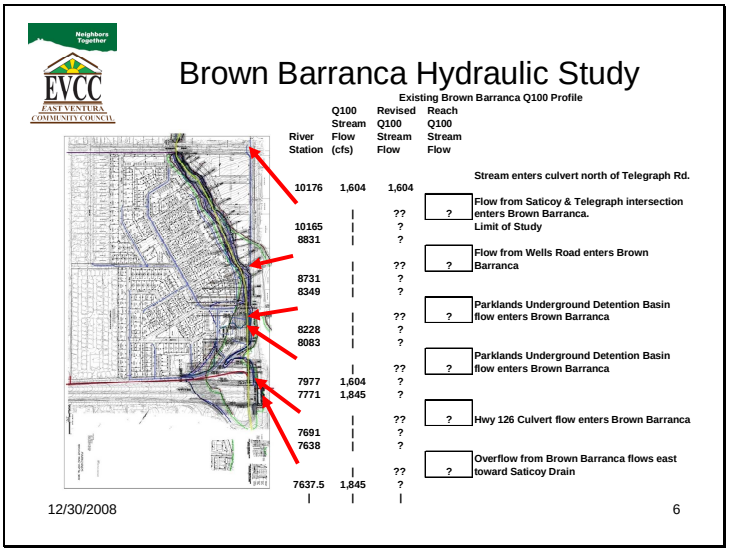
10.65

The Brown Barranca Hydraulic Study for Parklands Development by OMRON Engineering is flawed in its basic input data.

The difference in the Q100 flow between the Hwy 126 and Telegraph Road is 241 cfs and the existing Q100 flow for the 67 acres is 195 cfs leaving a flow balance of only 46 cfs from all other sources.

Any components of the project design based on the flow data are questionable and required review.

Slide 29



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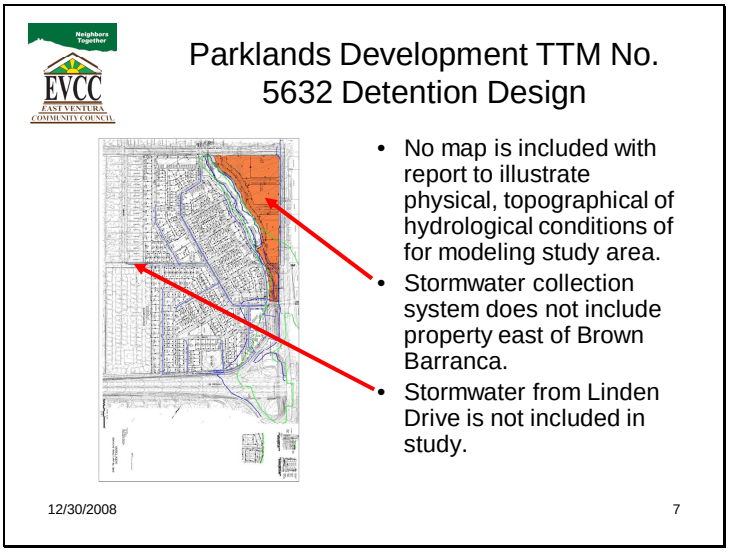
Any components of the project design based on the flow data are questionable and required review.

Slide 30



10.66

Parklands Development TTM No. 5632 Detention Design is incomplete and may be erroneous.

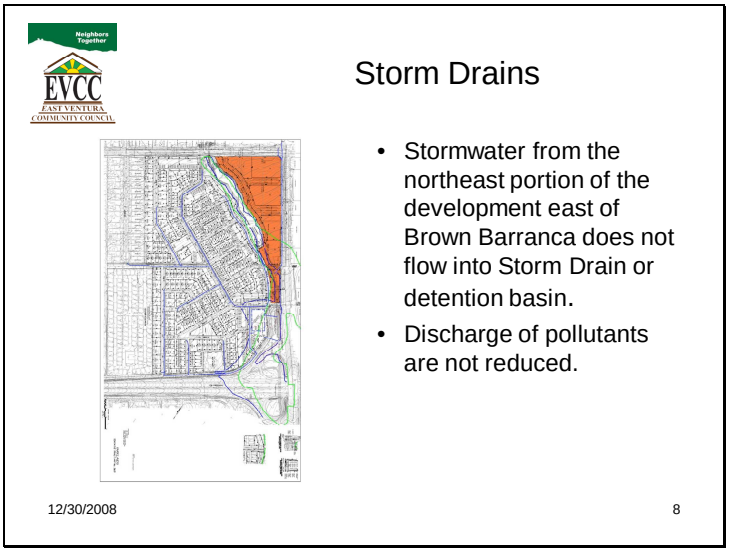
No map is included with report to illustrate physical, topographical of hydrological conditions of for modeling study area.

The stormwater collection system does not include property east of Brown Barranca.

Stormwater from Linden Drive is not included in study.

Exisiting Conditions Peak Flow, 192 cfs from 67 acres.

Slide 31

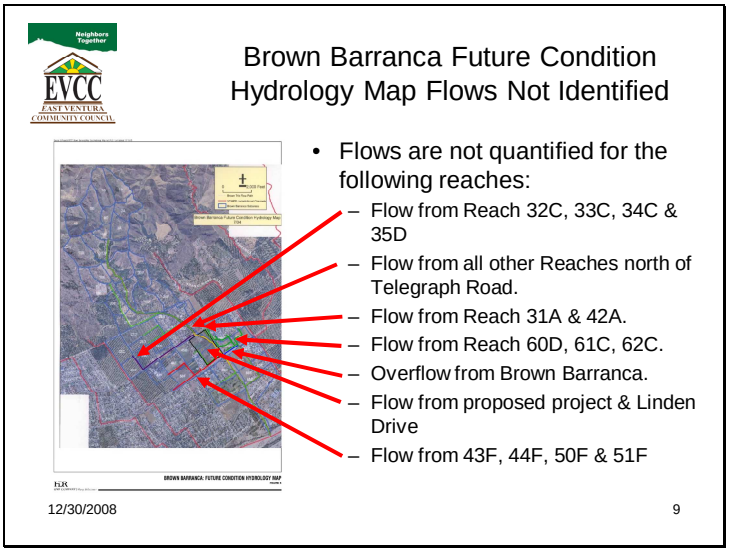


10.66

Stormwater from the northeast portion of the development east of Brown Barranca does not flow into Storm Drain or detention basin.

Pollutant discharge is not controlled or reduced.

Slide 32



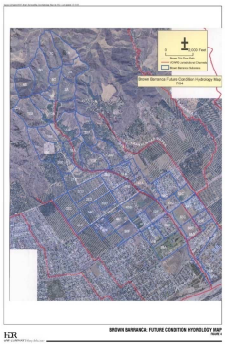
10.66

Flows into Brown Barranca are not identified for the following reaches:

Flow from Reach 31A & 42A.
Flow from all other Reaches north of Telegraph Road.
Flow from Reach 32C, 33C, 34C & 35D
Flow from Reach 60D, 61C, 62C.
Overflow from Brown Barranca.
Flow from proposed project & Linden Drive
Flow from 43F, 44F, 50F & 51F

Slide 33

Watershed Protection District Proposed Project



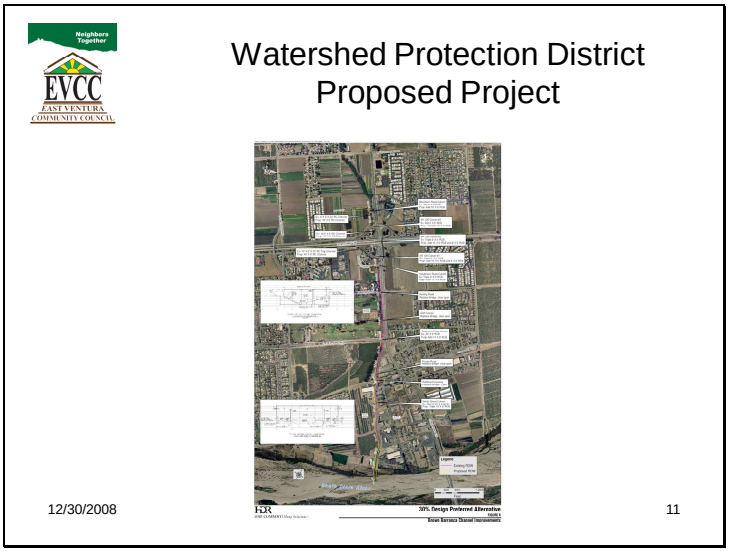
1A	13D	27D	42A
2A	15A	28D	43F
3A	16A	29B	44F
4B	17A	31A	45B
5B	18E	32C	50F
7C	19E	33C	51F
8C	20E	34C	52F
10B	23F	35D	
12A	24F	40D	

12/30/2008 10

10.66

The VCWPD Brown Barranca Pre-Design Report of Dec 2005 only identifies Brown Barranca subareas 25AF, 31A, 41AD, 53AF, 67AC and 70A below Blackburn Road and does not identify the drainage from the above listed Brown Barranca subareas

Slide 34

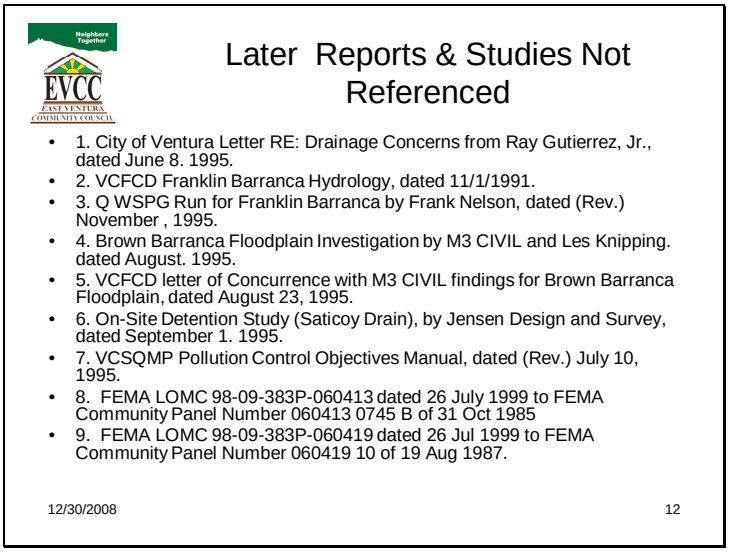


10.66

Improvements to Brown Barranca between Telegraph Road and Blackburn Road are not addressed in the VCWPD Brown Barranca Pre-Design Report of Dec 2005.

Only improvements to Brown Barranca between Blackburn Road and the Santa Clara River are addressed.

Slide 35



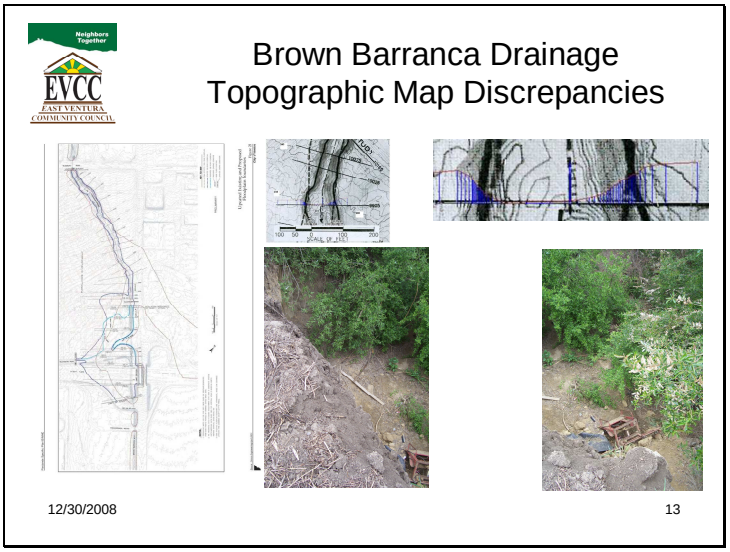
10.67

The following reports and studies conducted after 1985 are not referenced in the current Parklands Brown Barranca Reports

1. City of Ventura Letter RE: Drainage Concerns from Ray Gutierrez, Jr., dated June 8. 1995.
2. VCFCD Franklin Barranca Hydrology, dated 11/1/1991.
3. Q WSPG Run for Franklin Barranca by Frank Nelson, dated (Rev.) November , 1995
4. Brown Barranca Floodplain Investigation by M3 CIVIL and Les Knipping. dated August. 1995.
5. VCFCD letter of Concurrence with M3 CIVIL findings for Brown Barranca Floodplain, dated August 23, 1995.
6. On-Site Detention Study (Saticoy Drain), by Jensen Design and Survey, dated September 1. 1995.
7. VCSQMP Pollution Control Objectives Manual, dated (Rev.) July 10, 1995.
8. FEMA LOMC 98-09-383P-060413 dated 26 July 1999 to FEMA Community Panel Number 060413 0745 B of 31 Oct 1985.
9. FEMA LOMC 98-09-383P-060419 dated 26 Jul 1999 to FEMA Community Panel Number 060419 10 of 19 Aug 1987.

Note: Reference to Items 1-7 are contained in M3 Civil Letter dated September 12. 1995 to Cabrillo Economic Deve1opment re: Drainage Analysis: Brown Barranca, Franklin Barranca and Saticoy Drain – Loma Vista Project. Tentative Map S-4978, Saticoy with copies to Bill Hatcher, Associate Planner, City of Ventura, w/attachments
& Les Knipping, w/attachments.

Slide 36



10.68

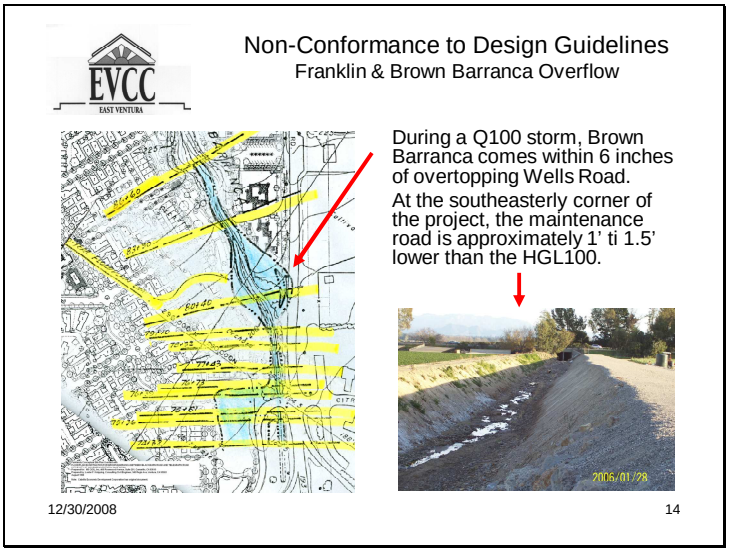
Field verification of sections to the Brown Barranca Drainage Topographic Map contained in Appendix A of the subject DMND has revealed discrepancies which cause all investigations and conclusion based on that map to be in error.

The data from the contours contained in the above map is not support by photographs of the same areas north of Telegraph Road and at Section 9905 south of Telegraph Road. The area around the drain above Telegraph Road is relatively flat ant the west wall of the barranca at Section 9905 is almost vertical.

Attached is Section 9905 developed from Figure 21, Updates & Existing Floodplain Boundaries.
The attached section clearly illustrates the banks of the Brown Barranca as indicated by the topographic map are inconsistent with the images of the of the Brown Barranca.

All subsequent stream velocity and floodplain elevation data and drainage reports illustrating the banks and streambed of Brown Barranca subsequently developed from the LIDAR image source data will be in error.

Slide 37



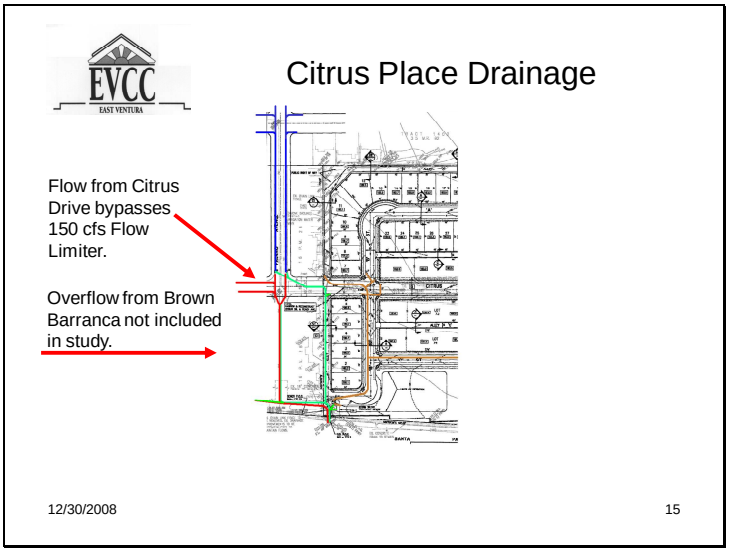
10.69

A Parklands Conceptual Site Plan Overlaid with the results of a Floodplain Inlvestigation for Brown Barranca Between Blackburn Road and Telegraph Road in the City of San Buenaventura, California prepared for M3 Civil by Lester F. Knipple dated August 1995 shows during a Q100 storm, Brown Barranca comes within 6 inches of overtopping Wells Road. Cabrillo Economic Development Corporation has a copy the original document.

The Frank Nelson study shows at the southeasterly corner of the project, the maintenance road is approximately 1' to 1.5' lower than the HGL100.

Source: Citrus Place Presentation 2006 09 03

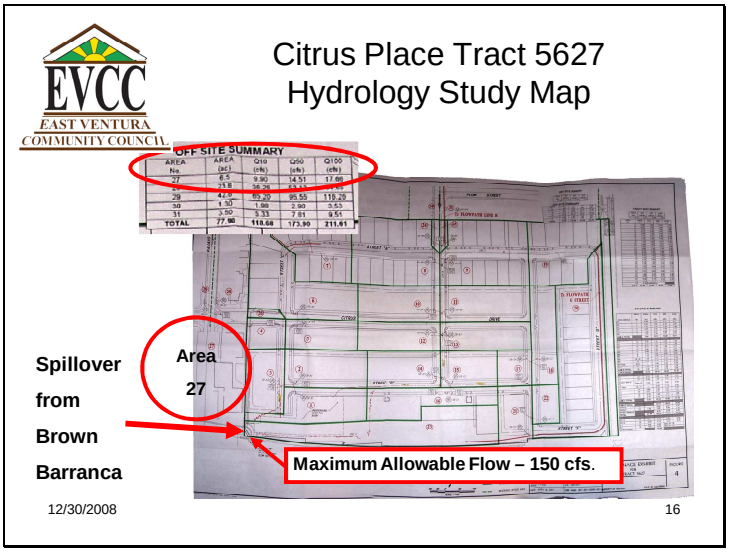
Slide 38



10.69

Reference: Citrus Place Presentation 2006 09 03

Slide 39



10.69

Drainage Map for Tract 5627

The Q100 Flow for the 6.5 acre Area 27 is only 17.66 cfs and does not include any spillover from Brpwn Barranca.

Slide 40

EVCC
EAST VENTURA COMMUNITY COUNCIL

City of San Buenaventura
ıitial Study EIR-2451 - Stormwater

5. All on-site storm water runoff will drain to catch basins installed as part of the project infrastructure. The catch basins will convey storm water into a subsurface drain system, outflow into the proposed park site, and sheetflow to an underground detention facility at the southwest corner of the project site. Water will exit the detention facility and flow through existing culverts under Highway 126 into the Ventura County Watershed Protection District system. The downstream County collection system has been determined by the County Flood Control District to be inadequate for containing existing runoff from the project site area. However, a Drainage Study performed by Jensen Design & Survey, Inc., dated August 2005, identified that on-site detention of approximately 122,000 cubic feet of water would mitigate the cumulative effect of the existing drainage area run-off.

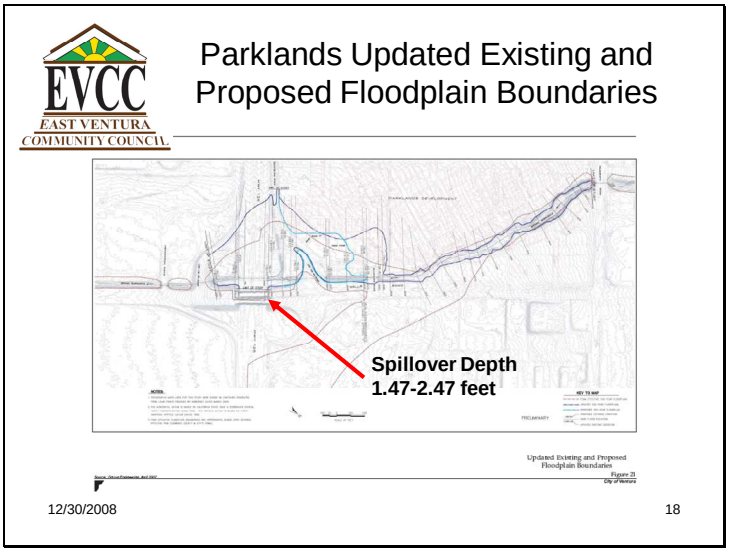
S-1 The applicant shall submit a detailed stormwater management plan addressing the retention of 122,000 cubic feet of surface runoff. The plan shall be developed with the assistance of the Ventura County Watershed Protection District and submitted to the City in conjunction with the Grading Plan.

12/30/2008 17

10.70

City of San Buenaventura Initial Study EIR-2451, Page 282

Slide 41

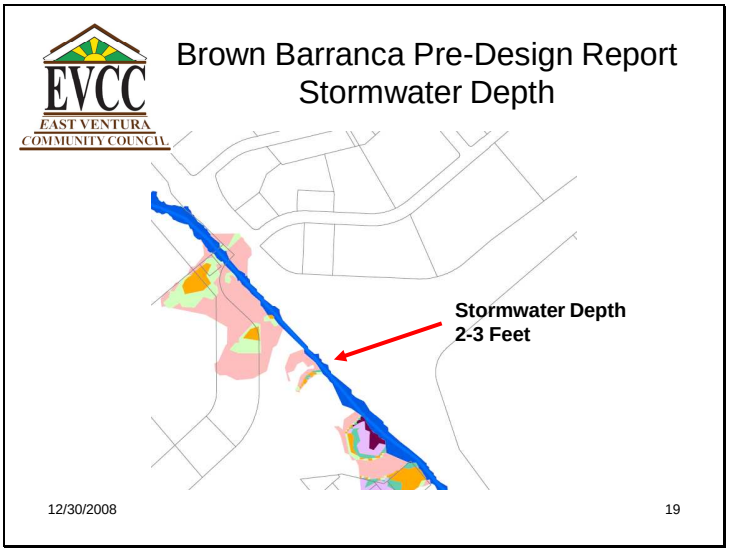


10.70

Parklands Updated Existing and Proposed Floodplain Boundaries

Updated Existing and Proposed Floodplain Boundaries dated April 2007 illustrates a flow depth of approximately 1.47 to 2.47 feet at the 126 Freeway.

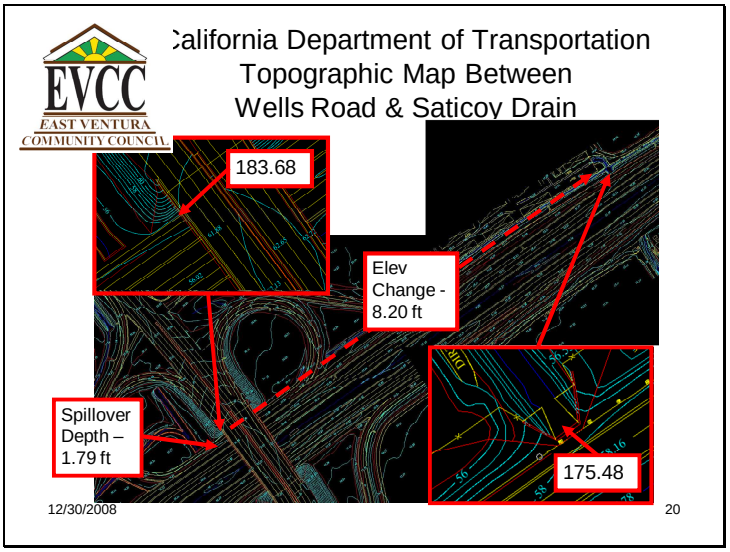
Slide 42



10.70

Figure 3 of the Brown Barranca Pre-Design Report, City of Ventura, Ventura County, California dated December 27, 2005 shows stormwater flow up to 3 feet deep at the 126 Freeway.

Slide 43

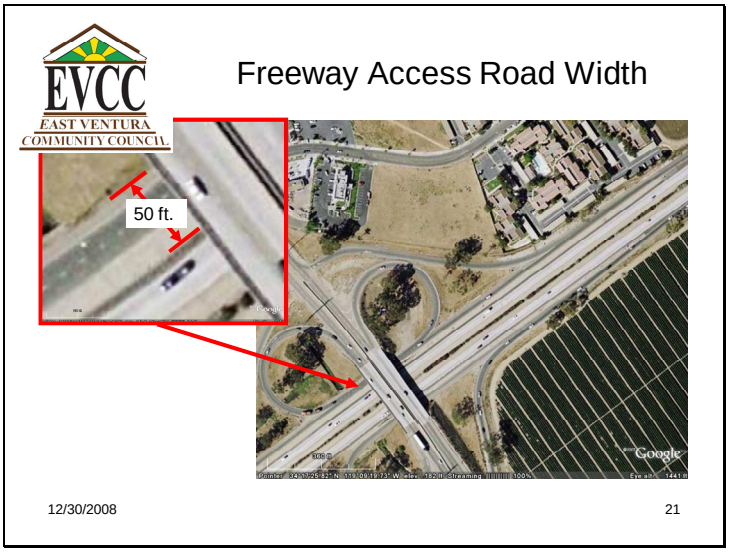


10.70

California Department of Transportation Topographic Map Between Wells Road & Saticoy Drain

The elevation difference between the spillover on the 126 Fwy at the Wells Road Overcrossing and the invert at the Saticoy Drain is 8.20 feet.
The depth of the spillover is 1.79 ft (185.47 – 183.68).
The Conversion Factor used is 3.28 feet per meter.

Slide 44

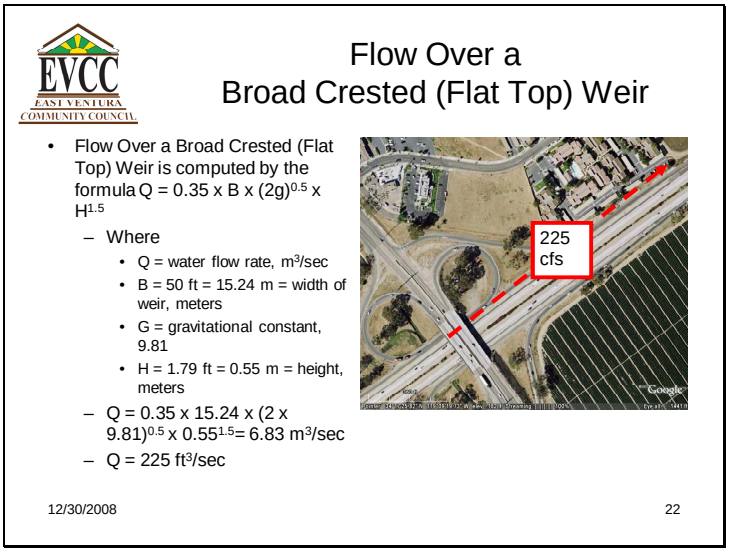


10.70

Freeway Access Road Width

The width of the 126 Freeway Access Road at the Wells Road Overcrossing is 50 feet as measured using Google Earth.

Slide 45



10.70

Flow Over a Broad Crested (Flat Top) Weir is computed by the formula $Q = 0.35 \times B \times (2g)^{0.5} \times H^{1.5}$

Where

Q = water flow rate, m^3/sec

B = 50 ft = 15.24 m = width of weir, meters

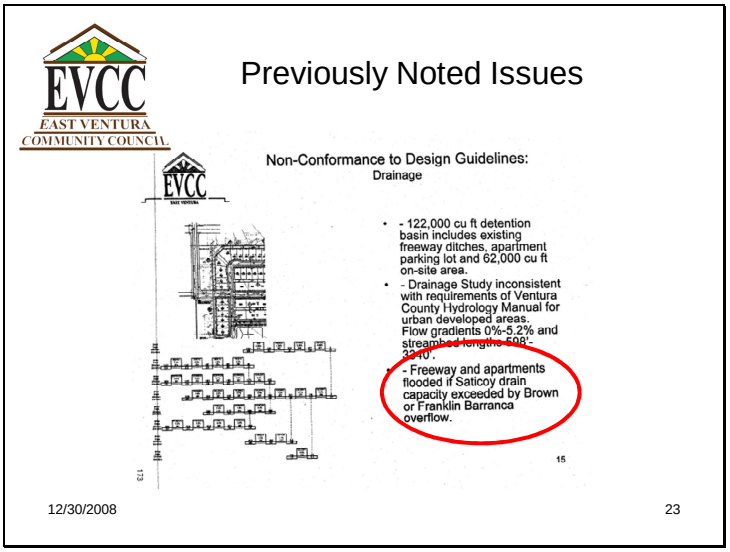
G = gravitational constant, 9.81

H = 1.79 ft = 0.55 m = height, meters

$Q = 0.35 \times 15.24 \times (2 \times 9.81)^{0.5} \times 0.55^{1.5} = 6.83\ m^3/sec$

$Q = 225\ ft^3/sec$

Slide 46



10.70

The City of San Buenaventura Administrative Report date 29 Jan 2007, Agenda Item No. Advance 2, Council Action Date February 12, 2007, contains the following slide submitted by the appellant stating that the freeway and apartments would flood if the Saticoy Drain capacity was exceeded by Brown or Franklin Barranca overflow.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.71

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

Investigation as to the extent and magnitude of an asbestos hazard is based on one remote finding and the supposition of past unrelated historical practices and is incomplete. 10.72

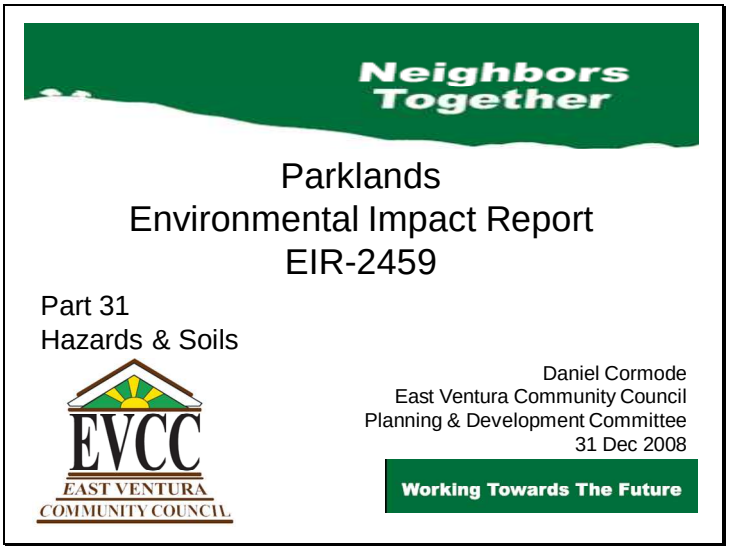
Reports and maps of liquefaction areas are not shown. 10.73

The EIR does not address different soil types and characteristics which were reported in the site. 10.74

Physical inspection of the Brown Barranca has revealed the actual slope of the stream bank is inconsistent with the slope shown on the topographic maps. 10.75

The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 31
Hazards & Soils
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
31 Dec 2008
Working Towards The Future

10.75

Slide 4

10.75

The EIR is incomplete.

A substantial amount of significant information and detail is not contained in the EIR.

Slide 5

Asbestos Hazard

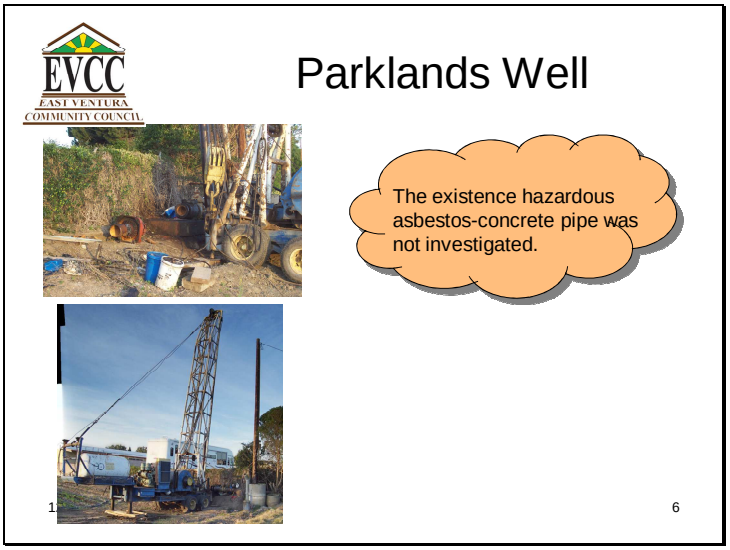
- Asbestos Cement. A piece of asbestos cement (AC) approximately 5 feet long and 6 inches in diameter was observed in the southern field area in a pile of agricultural debris.
- Historically, AC pipe was typically installed in irrigation systems expected to have moderate water pressures, which would exceed the strength of concrete pipe but be less than the design strength of AC pipe. The topography of the plan area falls within that range, so it is possible that AC pipe was used in the on-site irrigation system, particularly in the southern portion of the site.
- Asbestos containing material poses a health threat due to its ability to adversely affect humans through respiration.

12/31/2008 5

10.75

Investigation as to the extent and magnitude of an asbestos hazard is based on one remote finding and the supposition of past unrelated historical practices and is incomplete.

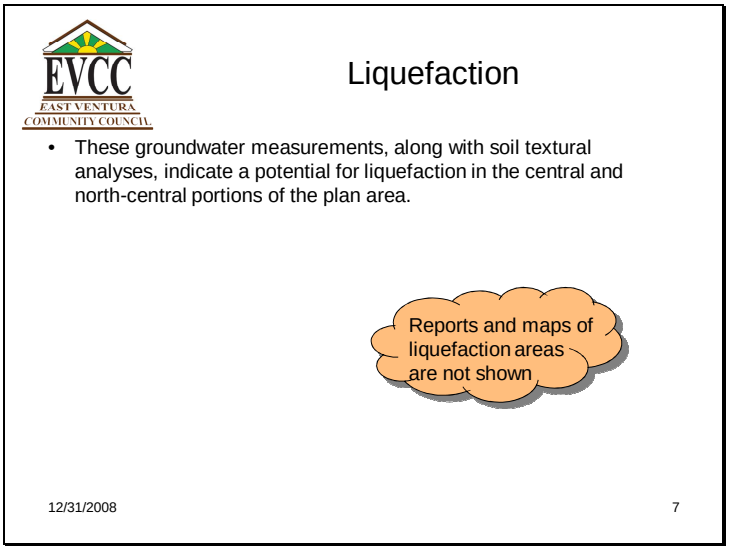
Slide 6



10.75

Both the location and material used to manufacture pipe for the water distribution are not identified in the EIR, although AC material was in common use at least during the middle part of the 20th century.

Slide 7

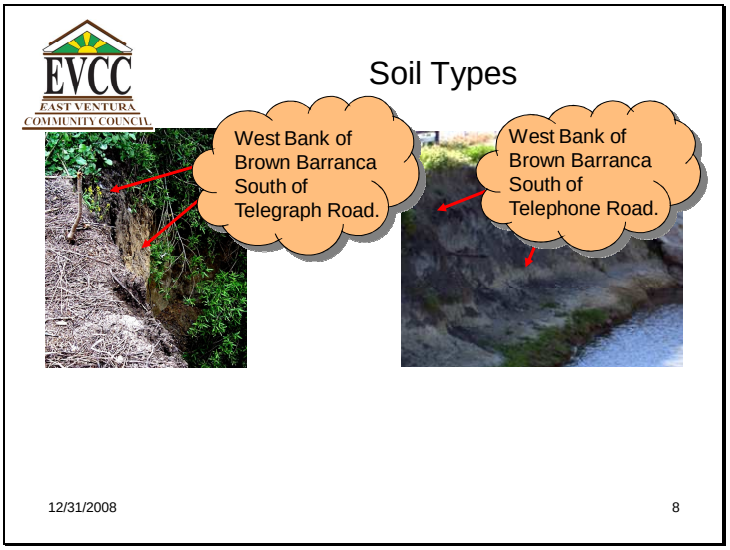


10.75

The EIR is incomplete.

Reports and maps of liquefaction areas are not shown.

Slide 8

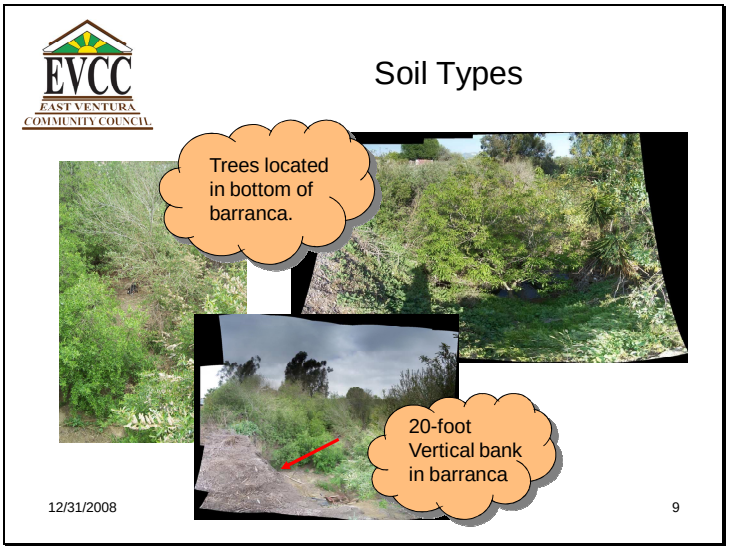


10.75

The EIR does not address soil types and characteristics.

Comparison of eroded areas along Brown Barranca just south of Telegraph and Telephone Roads reveals two types of soil with the depth of the darker type soil greater in the Vicinity of Telephone Road.

Slide 9



10.75

The EIR misrepresents the barranca land form and vegetation.

Topographic maps do not show current 20 foot vertical walls on the side of the barranca.

Restoration involves removal and replacement of 30 foot tall trees in the barranca.

Chapter 13
Parklands EIR-2459 Review Comments –
Parking

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

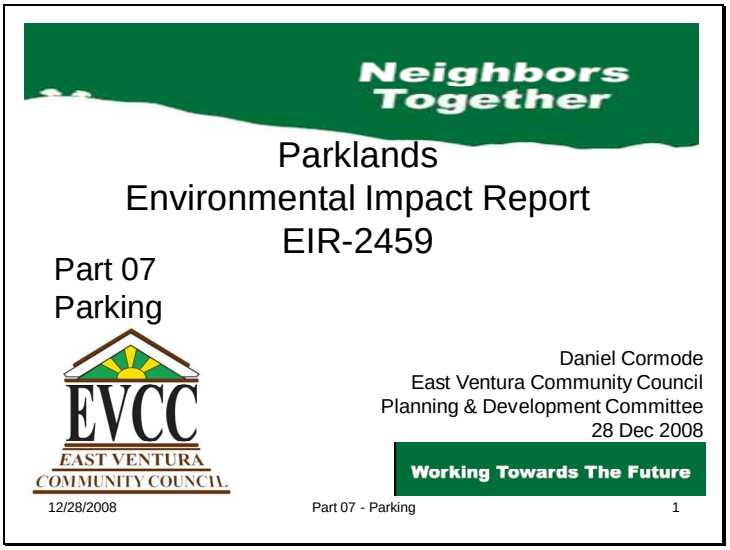
The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.76

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of either the impact of the proposed residential development or the cumulative impact of the proposed residential development on the subject area of concern.

The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
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12/28/2008
Part 07 - Parking
1

Slide 2

Parking

- Existing Problems.
  - Oxnard - Bartolo Square South Neighborhood.
  - Northbank Greens
- New Urbanists are Out of Touch with Reality
  - Traditional Neighborhood Development (TND)
  - Walkable Neighborhoods.
- Parking Demographics for Census Tracts 12.01, 13.01 & 13.02
  - Vehicles Per Household
  - Parking Spaces & Vehicles Per Household
  - Vehicles Available to Household
  - Spaces Per Dwelling Unit
  - Streets, Alleys and Public Liability
- Specific Plan Parking Requirements

12/28/2008 Part 07 - Parking 2

10.77

Parking

Existing Problems.
- Bartolo Square South Neighborhood in Oxnard
- Northbank Greens

New Urbanists are Out of Touch with Reality
- Traditional Neighborhood Development (TND)
- Walkable Neighborhoods.

Parking Demographics for Census Tracts 12.01, 13.01 & 13.02

Vehicles Per Household
- Parking Spaces & Vehicles Per Household
- Vehicles Available to Household
- Spaces Per Dwelling Unit
- Streets, Alleys and Public Liability

Specific Plan Parking Requirements

Slide 3

Existing Parking Problems

- Property owners in three central Oxnard neighborhoods won the right to flatten curbs and pave over front yards to alleviate parking problems after the City Council Tuesday unanimously gave its permission for the plan.*
- Tuesday's decision ends the dustup over parking problems in Bartolo Square North, Bartolo Square South and Hill Street neighborhoods. Overcrowded housing has left few parking spots in those neighborhoods.*
- * Ventura County Star 2007 06 20

12/28/2008 Part 07 - Parking 3

10.77

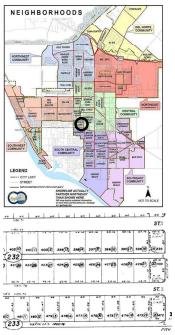
Existing Parking Problems

Property owners in three central Oxnard neighborhoods won the right to flatten curbs and pave over front yards to alleviate parking problems after the City Council Tuesday unanimously gave its permission for the plan.*

Tuesday's decision ends the dustup over parking problems in Bartolo Square North, Bartolo Square South and Hill Street neighborhoods. Overcrowded housing has left few parking spots in those neighborhoods.*

Slide 4

Bartolo Square South
Neighborhood Characteristics



Parcel Sizes 60’ x 101’ & 63’ x 95’

Front or Alley Loaded Garages

Up to7 vehicles per parcel (2 Garage, 2 Off Street & 3 On Street

12/28/2008 Part 07 - Parking 4

10.77

Bartolo Square South Neighborhood Characteristics

Parcel Sizes 60’ x 101’ & 63’ x 95’
Front or Alley Loaded Garages
Up to7 vehicles per parcel (2 Garage, 2 Off Street & 3 On Street

Slide 5

10.77

Northbank Greens - Parking Issues Created by Overcrowding

Illegal Parking
- Neighborhood disputes.
- Increased calls for public police and fire service

Insufficient Parking Spaces
- Alleys & Narrow Lots decrease total parking space availability

Slide 6

10.77

Northbank Greens

Garage Uses – Storage, Parking & Occupancy

Slide 7

What the New Urbanists Believe

- "There isn't one thing that conventional development can do as well as TND," Duany told the builders at the seminar.
- Opponents often claim TND, which is rooted in the historic urban planning concepts of colonial America, can't deal with the reality that American families now own as many as two, three, or even four automobiles. "It's a fallacy," Duany responds.
- "A conventional (front-loaded) 50-foot lot can accommodate five cars. Two in the garage, two in the driveway, and one parked on the street in front of the house. And the two in the driveway are blocking those in the garage.
- "By contrast, a 50-foot TND lot, with the garage at the rear, on the alley, can accommodate seven cars. Two in the garage, three in guest parking spaces across the back of the lot (beside the garage), and two parked on the street in front of the house (since there is no driveway in front)."
- TND allows homeowners the freedom of a pedestrian-oriented neighborhood where one car is enough, says Duany. "But if you chose to have more, TND gives you more places to put them, or a boat or a recreational vehicle. And the storage of those toys is not out front, where it ruins the 'curb appeal' of the home.
- "Moreover, even though a TND lot has seven parking spaces, compared to five on a conventional lot, the cars in the garage are never blocked, as they are by cars in the driveway of a conventional lot."
- "By contrast, a 50-foot TND lot, with the garage at the rear, on the alley, can accommodate seven cars. Two in the ga-rage, three in guest parking spaces across the back of the lot (beside the ga-rage), and two parked on the street in front of the house (since there is no driveway in front)."
- Duany: TND Will Defuse Anti-Growth Politics, By: Bill Lurz, Senior Editor, *February 6, 2000*, Professional Builder

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10.77

What the New Urbanists Believe

Contrary to the above statement, a 50-foot Single Family Home on 50-foot TND lot, with the garage at the rear, on the alley, can only accommodate **four** cars. Two in the garage and two parked on the street in front of the house.

"TND allows homeowners the freedom of a pedestrian-oriented neighborhood where one car is enough" is not supported by US Census demographic data.

Only 32.1% of the households have one vehicle available.
Two or move vehicles are available to 62.6% of the households.

Slide 8

Parking Demographics for Census Tracts 12.01, 13.01 & 13.02

- Vehicles Per Household
- Parking Spaces & Vehicles Per Household
- Vehicles Available to Household
- Spaces Per Dwelling Unit
- Streets, Alleys and Public Liability

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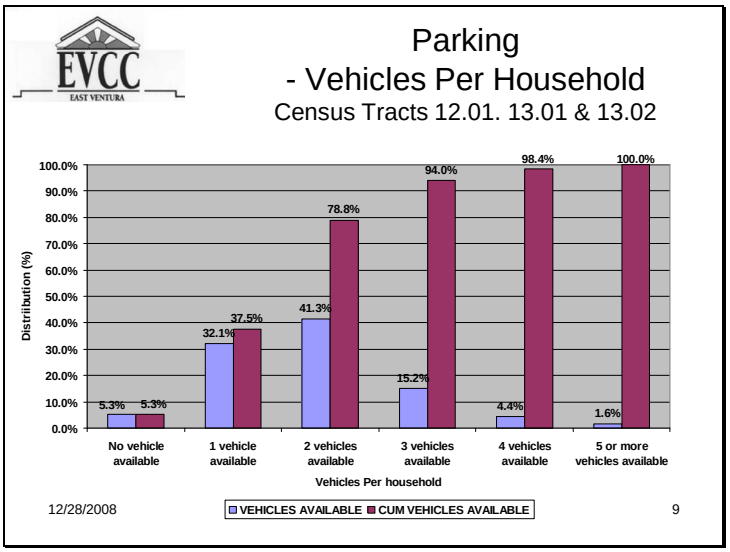
10.77

Source: 2000 US Census Tracts 12.01, 13.01 & 13.02

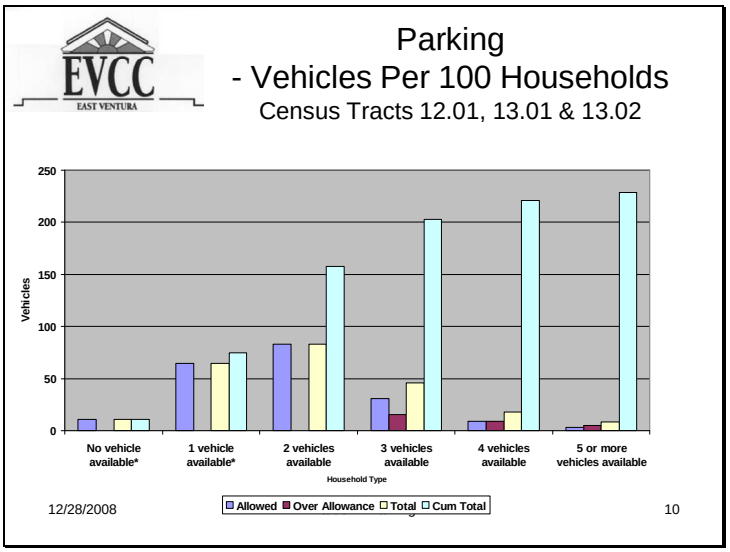
Slide 9



10.77

Households owning at least two vehicles comprise 78.8% of the population.
Ref: QTXLS Presentation Download Vehicles Available 1201 1301 1302

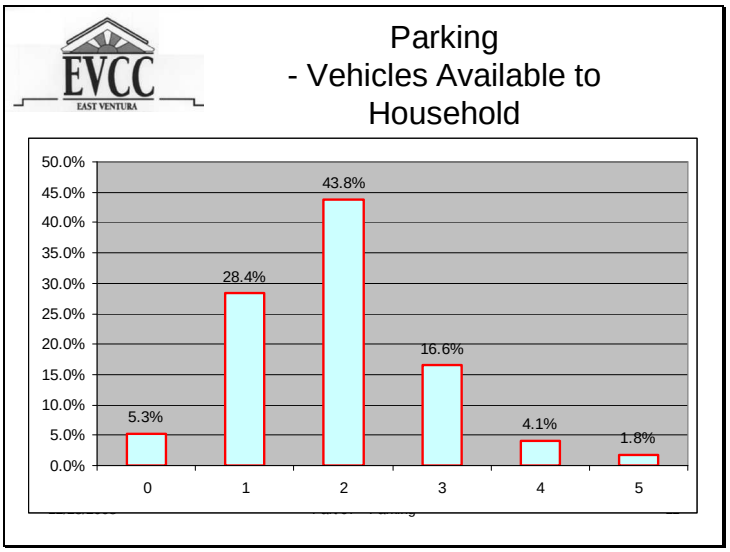
Slide 10



10.77

Source: 2000 US Census Tracts 12.01, 13.01 & 13.02

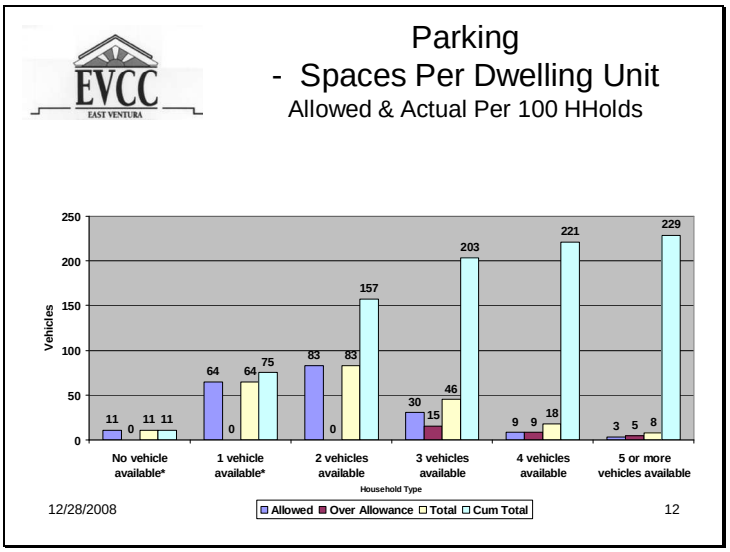
Slide 11



10.77

Source: Census 2000 Demographic Profile for ZIP Code Area 93004.

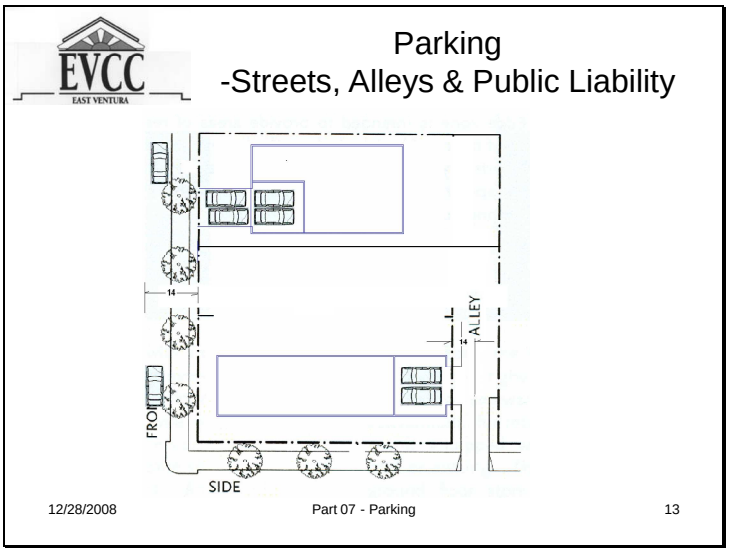
Slide 12



10.77

It is estimated that there are 229 on and off-site parking spaces required per 100 household (2.29 spaces per DU). The estimate is based on the premise that each household is allowed at least two covered parking spaces per dwelling unit.

Slide 13



10.77

Elimination of alleys decreases the space subject to maintenance and public liability by 50% and increases the number of on-site parking spaces.

Slide 14

Specific Plan Parking Rqmts

Downtown Specific Plan Parking Space Requirements						
	T4. 1	T4. 2	T4. 3	T4. 4	T5.1	T6.1
	Urban General 1	Urban General 2	Urban General 3	Thompson Corridor	Neighborhood Corridor	Urban Core
Residential	1 Parking Space Per 1,500 SF. None for single room occupancy units	1 Parking Space Per 1,500 SF. None for single room occupancy units	1 Parking Space Per 1,500 SF. None for single room occupancy units	1 Parking Space Per 1,500 SF. None for single room occupancy units	1 Parking Space Per 1,500 SF. None for single room occupancy units	1 Parking Space Per 1,500 SF. None for single room occupancy units
Non-Residential	2 Per 1,000 SF	2 Per 1,000 SF	2 Per 1,000 SF	2 Per 1,000 SF	2 Per 1,000 SF	2 Per 1,000 SF
The total number of off-street parking spaces required may be reduced if the spaces can be shared among the various uses of a mixed-use development, confirmed through a land use entitlement condition.						
Up to 35% of required off-street parking spaces may be compact.						
Any surplus parking may be compact.						
Up to 100% of the required off-street parking spaces may be provided off-site, but within 1250 ft. of the site and shall be confirmed through a land use entitlement condition.						
A fee may be paid in-lieu of providing the required number of spaces and shall be confirmed through a land use entitlement condition						

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10.77

Slide 15

Specific Plan Parking Rqmts

Midtown Corridor Development Code		
	T4.5	T5.2
	Urban General	Urban Center
Residential	1 Parking Space for Per 1,500 SF of Gross Floor Area or 1.5 Per Dwelling Whichever is Higher. No parking spaces required for affordable housing or single resident occupancy units.	1 Parking Space for Per 1,500 SF of Gross Floor Area or 1 Per Dwelling Whichever is Higher. No parking spaces required for affordable housing or single resident occupancy units.
Non Residential	2 spaces per 1,500 SF of gross floor area.	2 spaces per 1,000 SF of gross floor area office. 3 spaces per 1,000 SF of gross floor area retail.
Each site shall be provided off-street parking as follows, designed in compliance with the requirements In Zoning Ordinance Chapter 24.415		
A multi-use site may provide shared parking with the required number of spaces reduced In compliance with Section 30203.32 (Shared Parking).		

12/28/2008 Part 07 - Parking 15

10.77

Slide 16

Specific Plan Parking Rqmts

	T-4	T3.2	T3.1
	Corridor	Neighborhood General	Neighborhood Edge
Parking			
Residential (Market Rate)	2 on-site spaces per unit	2 on-site spaces per unit	2 on-site spaces per unit
Residential (Moderate Income)	2 spaces per unit++		
Residential (Very Low Income)	1 space per unit++		
Residential (Guest)	0.25 spaces per unit++		
Live-Work	2 on-site spaces per unit	2 on-site spaces per unit.	
Live-Work Guest	0.25 spaces per unit		
Carriage House			1 on-site uncovered space per unit.
Commercial	4 spaces per 1,000 SF++		

12/28/2008 Part 07 - Parking 16

10.77

Slide 17

Specific Plan Parking Rqmts

Building Height	Maximum height to parapet or eave: 50 FT.	Maximum height to parapet or eave: 25 FT.* Occupiable Attic Space may be occupied and not count as a story when applying height limits of applicable zone. Occupiable attic space shall not exceed 75% of ground floor footprint.	Maximum height to parapet or eave: 25 FT.* Occupiable Attic Space may be occupied and not count as a story when applying height limits of applicable zone. Occupiable attic space shall not exceed 75% of ground floor footprint. For dwellings within the Neighborhood Edge Overlay, upper floor windows shall not be allowed to face the rear yard.

12/28/2008 Part 07 - Parking 17

10.77

Slide 18

Specific Plan Parking Rqmts

Carriage House	???
Single Family House	Required parking shall be accommodated within a garage or carport
Duplex, Triplex and Quadplex	Required parking shall be in garages which may contain up to 4 cars.
Bungalow Court	Required parking shall be at-grade and within garages or carports which may contain up to 6 cars.
Rowhouse	Required parking shall be within a garage, which may be attached to or separated from the dwelling.
Live-Work	Required parking for one car shall be in a garage which may be attached to, or detached from, the building. The remaining required parking spaces may be within a garage, carport, or be uncovered.
Courtyard Housing	Required parking shall be at-grade (surface or garage) or subterrainian.

12/28/2008 Part 07 - Parking 18

10.77

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura. 10.78

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

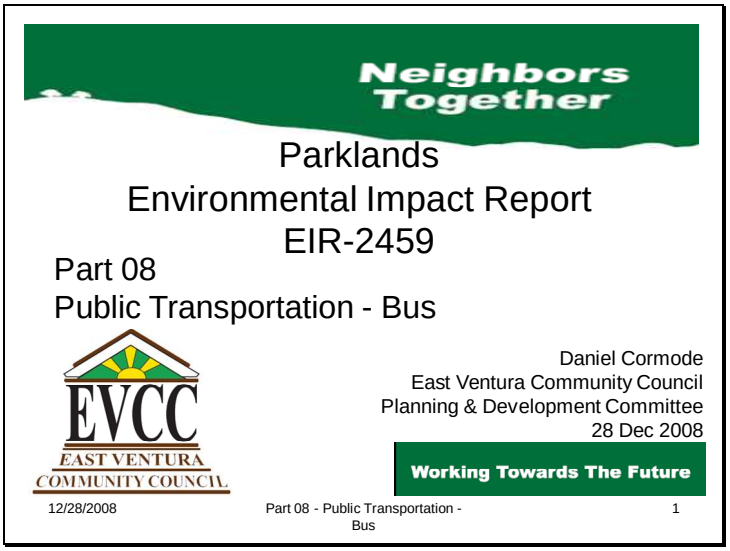
The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

The EIR does not address the physical, economic or social impacts of the increased demand for public bus service created by either the specific residential development or the cumulative impact of residential development. 10.79

The EIR does not address the capability of the public bus service to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32 10.80

The above statements are substantiated by information contained in the attached slides

Slide 1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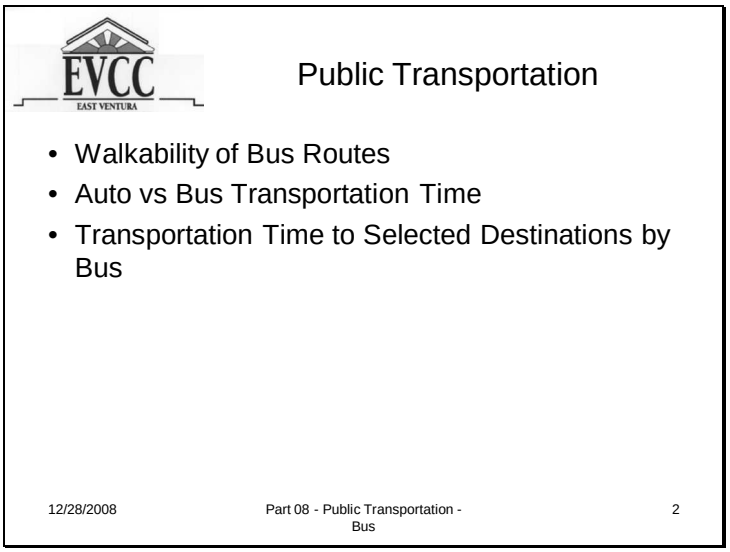
1

10.81

Slide 2

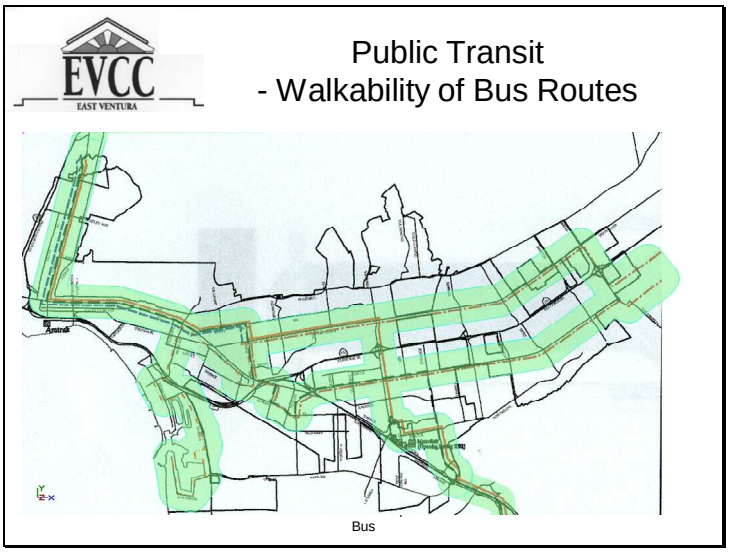


10.81

Public Transportation

Walkability of Bus Routes
Auto vs Bus Transportation Time
Transportation Time to Selected Destinations by Bus

Slide 3



10.81

Public Transit - Walkability of Bus Routes [1]

It is estimated that at least one half of the residents do not live within a walkable distance from a public bus stop.
The terrain slopes in neighborhoods above Foothill Road or Poli Street prevent making bus stops walkable.

[1] Source: SCAT Map

Slide 4

Public Transportation
Public Transit vs Private Vehicle

	Estimated Travel Time Using Public Transit (excluding layover time for transfer)[1]	Private Vehicle[2]	Increase in Travel Time to Use Public Transit
Ojai to Downtown	1:07	0:25	0:42
Oxnard Transportation Center to Downtown	1:04	0:14	0:50
Harbor to Downtown	0:45	0:09	0:36
Wells Center to Downtown	0:37	0:11	0:26

1 Source: GCAT Transit Schedules
2 Source: Mapquest Travel Directions and Times

12/28/2009 Part 08 - Public Transportation - Bus 4

10.81

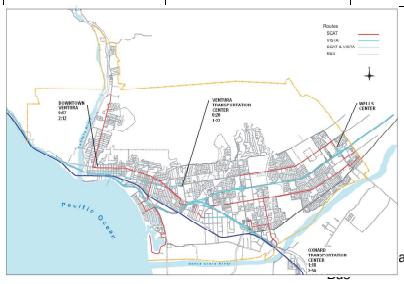
Public Transportation - Public Transportation

Public Transit vs Private Vehicle – Increase in travel time to use Public Transit: 26-50 Minutes.

Slide 5

Public Transportation
- Time to Destination

Transit Time	Wells Center to Ventura Transportation Center	Wells Center to Oxnard Transportation Center	Wells Center to Downtown Ventura
Minimum	0:20 Hours	1:18 Hours	0:57 Hours
Maximum	0:82 Hours	2:50 Hours	2:12 Hours



Long transit times to major connections make use of public transportation is impractical.

ation - 5

10.81

Long transit times derived from local bus schedules to major connections make use of public transportation is impractical.[2]

-The transit time from Wells Center to the Ventura Transportation Center is calculated to be from 20 to 82 minutes.

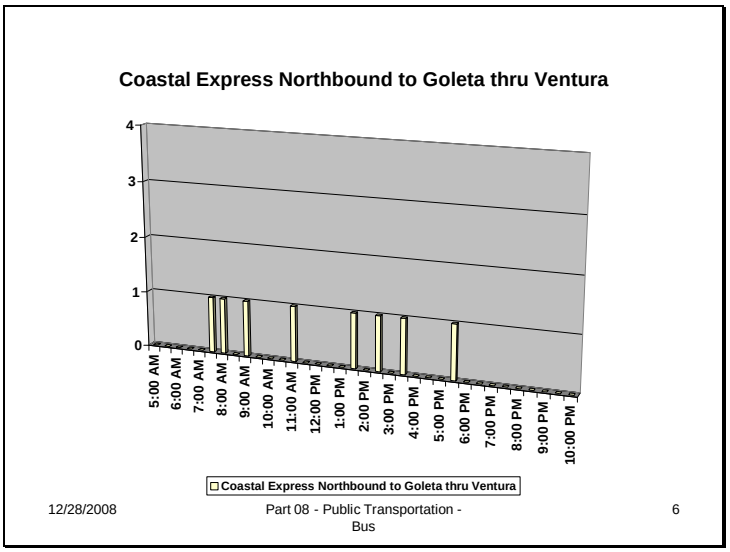
-The transit time from Wells Center to the Oxnard Transportation Center is calculated to be from to 78 to 170 minutes.

-The transit time from Wells Center to Downtown Ventura is calculated to be from 57 minutes to 132 minutes.

-

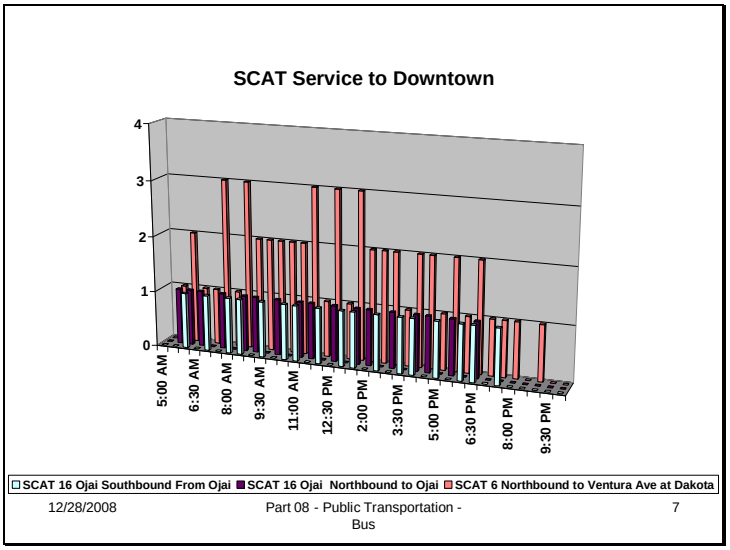
[2] Ref: WSCP Public Transportation

Slide 6



10.81

Slide 7



SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.

The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment.

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern. 10.82

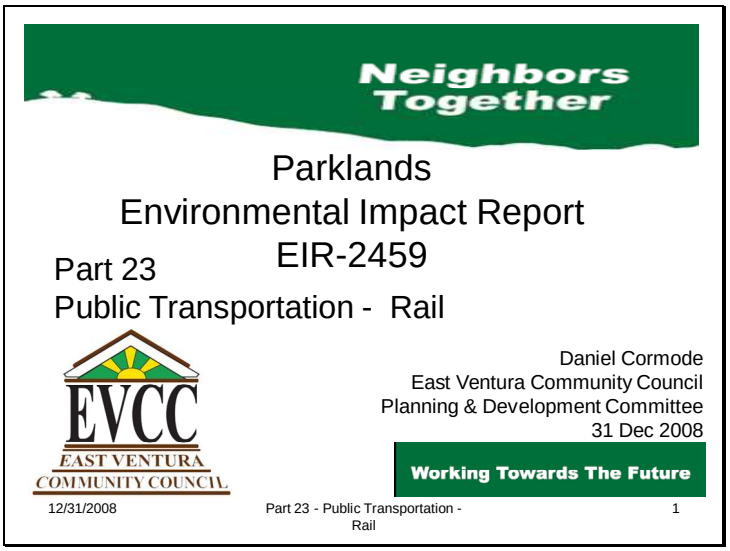
The EIR does not address the physical, economic or social impacts of the increased demand for public rail service created by either the specific residential development or the cumulative impact of residential development.

Rail schedules and service does not make public transportation by rail a viable alternative for most employees.

The EIR does not address the capability of the public rail service to meet the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32.

The above statements are substantiated by information contained in the attached slides

Slide 1


Neighbors Together
Parklands
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Working Towards The Future
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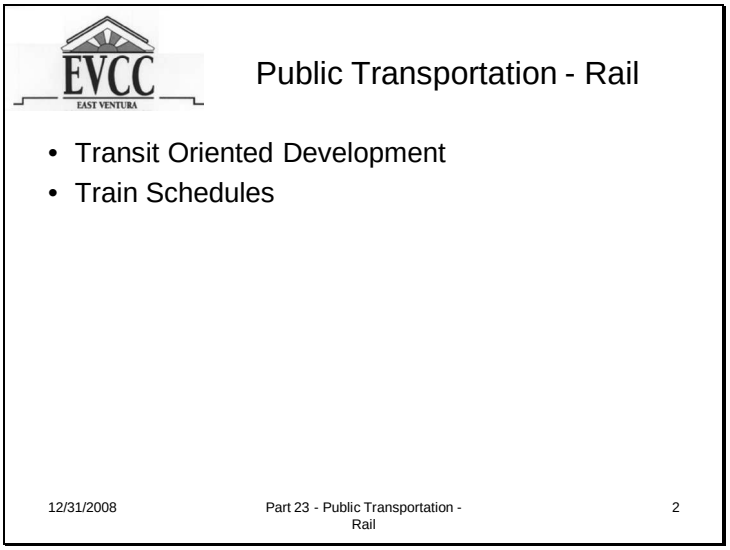
Part 23 - Public Transportation - Rail
1

10.82

Slide 2

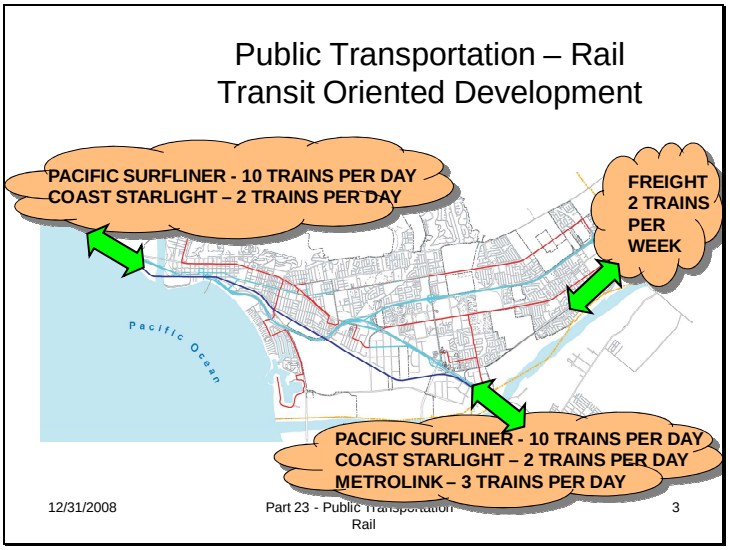


10.82

Public Transportation

Transit Oriented Development
Rail Schedules

Slide 3



10.82

Rail Transit Oriented Development:

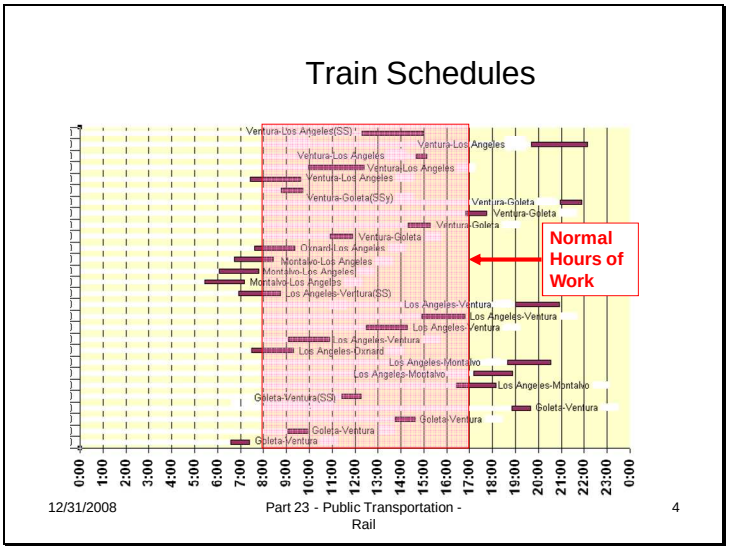
Rehabilitation of the Saticoy Train Station is not economically supportable due the lack of daily trains (No daily trains).

No common rail transit Center

Fairgrounds Station serves Pacific Surfliner and Coast Starlight

Montalvo Station serves Metrolink

Slide 4



10.82

Train Schedules are generally not compatible with employee work schedules:

No trains are available for employees working 12:00PM to 8:00AM or 4:00 PM to 12:00PM shifts.

Only 2 of 8 daily trains arrive in Los Angeles from Montalvo to meet needs of employees working an 8:00AM to 5:00PM shift.

Only 2 of 7 daily trains arrive in Montalvo from Los Angele4s to meet needs of employees working an 8:00AM to 5:00PM shift.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.

10.83

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The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

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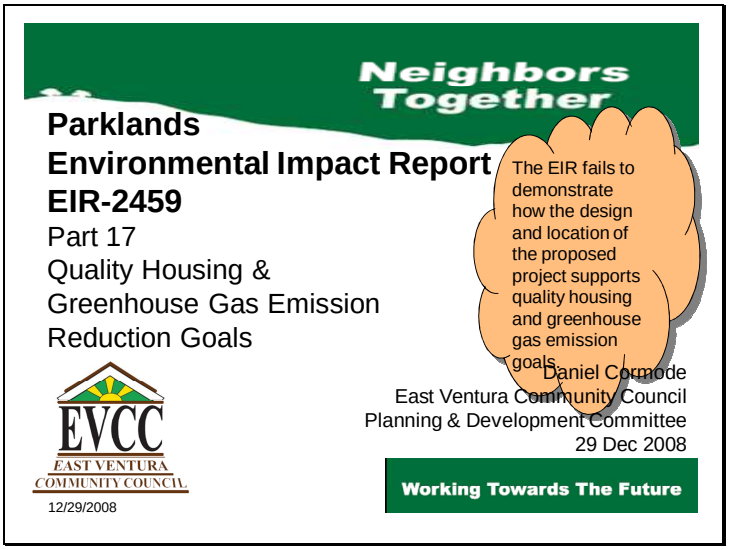
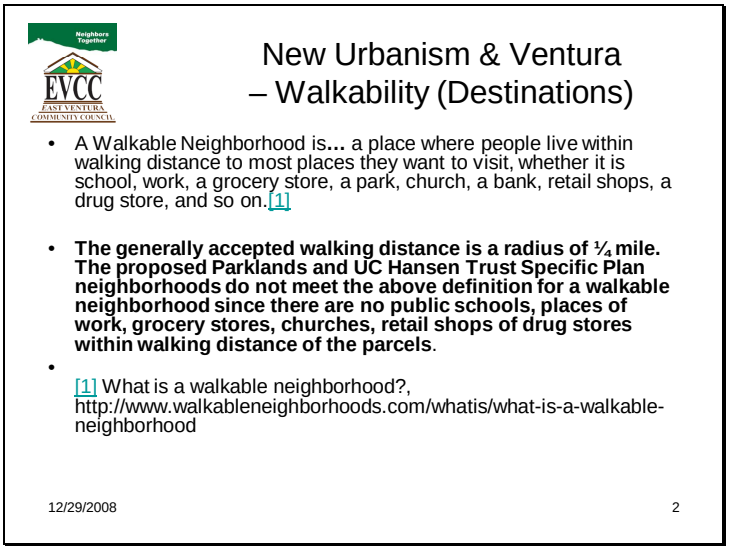
Slide 1



10.83

The EIR does not provide data to demonstrate how the design and location of the proposed residential development project supports the goal of providing a decent home nor are reduction in greenhouse emissions addressed.

Slide 2



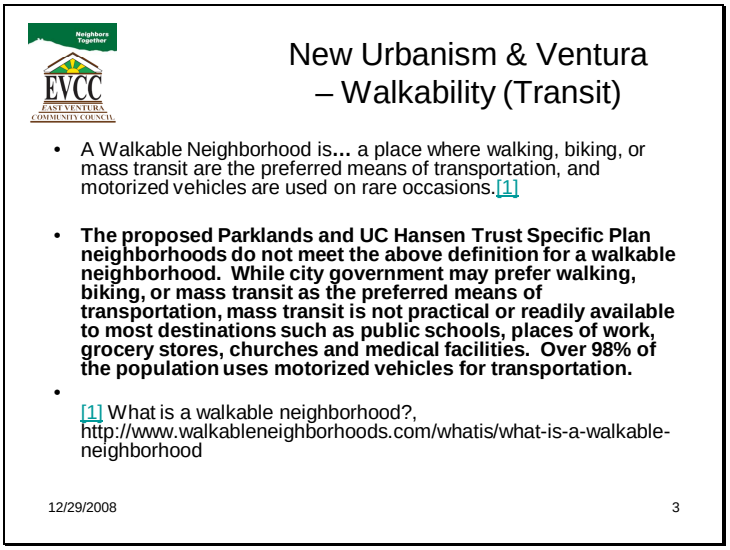
10.84

A Walkable Neighborhood is… a place where people live within walking distance to most places they want to visit, whether it is school, work, a grocery store, a park, church, a bank, retail shops, a drug store, and so on.[1]

The generally accepted walking distance is a radius of ¼ mile. The proposed Parklands and UC Hansen Trust Specific Plan neighborhoods do not meet the above definition for a walkable neighborhood since there are no public schools, places of work, grocery stores, churches, retail shops of drug stores within walking distance of the parcels.

[1] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

Slide 3



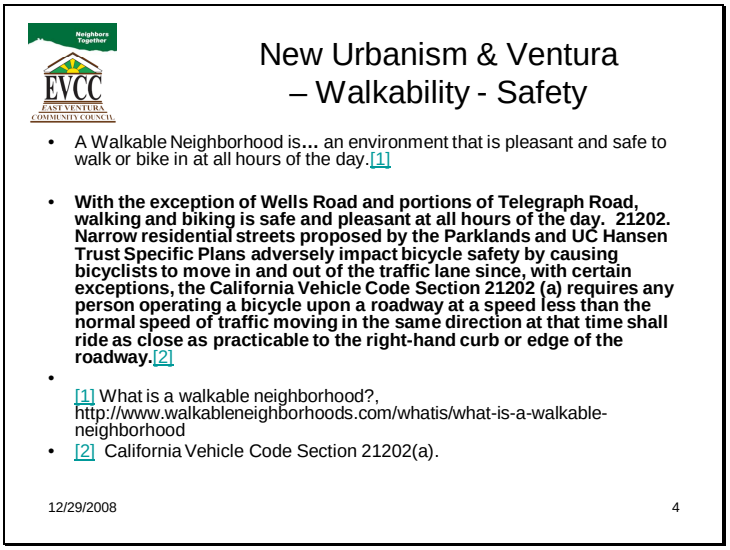
10.84

A Walkable Neighborhood is… a place where walking, biking, or mass transit are the preferred means of transportation, and motorized vehicles are used on rare occasions.[2]

The proposed Parklands and UC Hansen Trust Specific Plan neighborhoods do not meet the above definition for a walkable neighborhood. While city government may prefer walking, biking, or mass transit as the preferred means of transportation, mass transit is not practical or readily available to most destinations such as public schools, places of work, grocery stores, churches and medical facilities. Over 98% of the population uses motorized vehicles for transportation.

[2] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

Slide 4



10.84

A Walkable Neighborhood is… an environment that is pleasant and safe to walk or bike in at all hours of the day. [3]

With the exception of Wells Road and portions of Telegraph Road, walking and biking is safe and pleasant at all hours of the day.

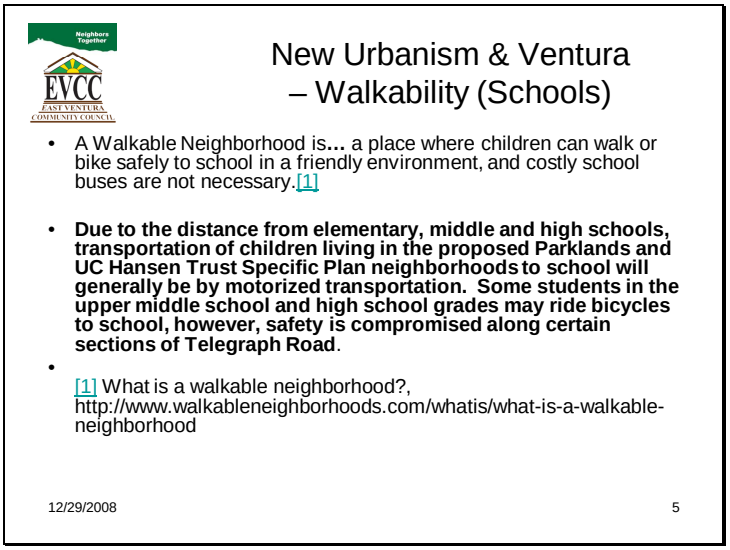
Narrow residential streets proposed by the Parklands and UC Hansen Trust Specific Plans adversely impact bicycle safety by causing bicyclists to move in and out of the traffic lane since, with certain exceptions.

The California Vehicle Code Section 21202 (a) requires any person operating a bicycle upon a roadway at a speed less than the normal speed of traffic moving in the same direction at that time shall ride as close as practicable to the right-hand curb or edge of the roadway.[4]

[3] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

[4] California Vehicle Code Section 21202(a).

Slide 5



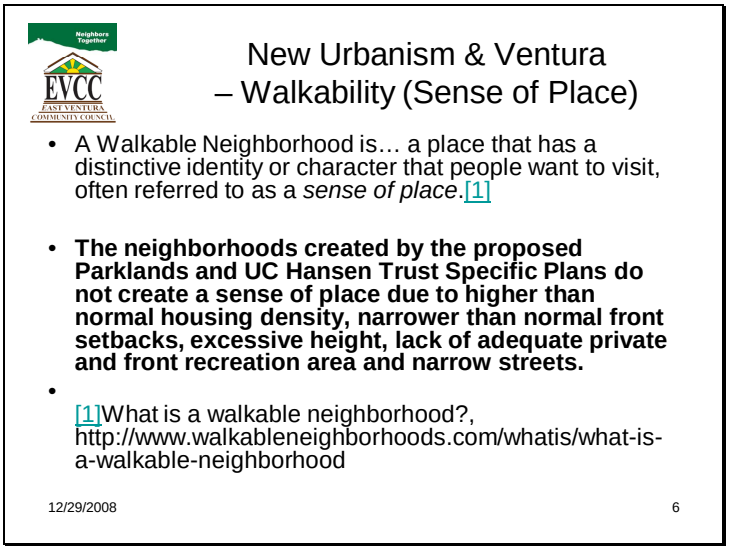
10.84

A Walkable Neighborhood is… a place where children can walk or bike safely to school in a friendly environment, and costly school buses are not necessary.[5]

Due to the distance from elementary, middle and high schools, transportation of children living in the proposed Parklands and UC Hansen Trust Specific Plan neighborhoods to school will generally be by motorized transportation. Some students in the upper middle school and high school grades may ride bicycles to school, however, safety is compromised along certain sections of Telegraph Road.

[5] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

Slide 6



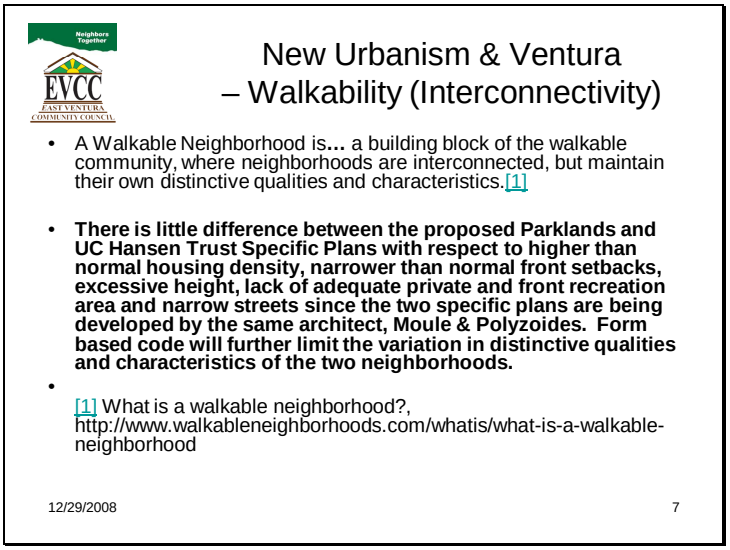
10.84

A Walkable Neighborhood is… a place that has a distinctive identity or character that people want to visit, often referred to as a *sense of place*. [6]

The neighborhoods created by the proposed Parklands and UC Hansen Trust Specific Plans do not create a sense of place due to higher than normal housing density, narrower than normal front setbacks, excessive height, lack of adequate private and front recreation area and narrow streets.

[6] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

Slide 7



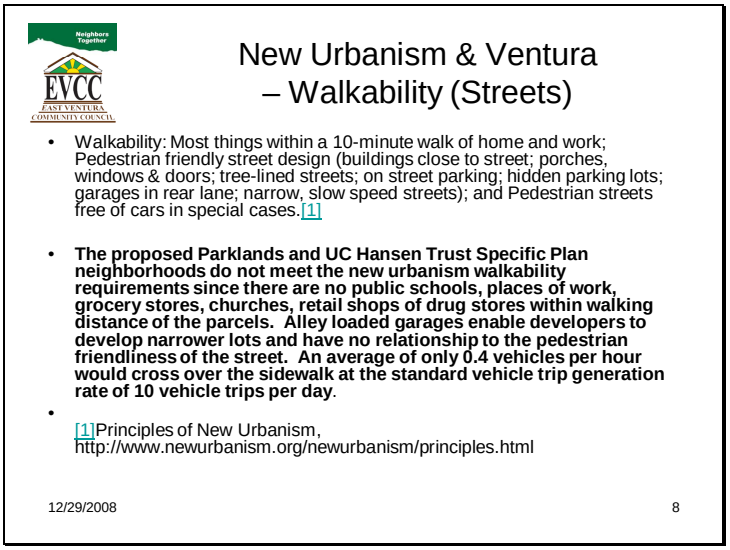
10.84

A Walkable Neighborhood is… a building block of the walkable community, where neighborhoods are interconnected, but maintain their own distinctive qualities and characteristics. [7]

There is little difference between the proposed Parklands and UC Hansen Trust Specific Plans with respect to higher than normal housing density, narrower than normal front setbacks, excessive height, lack of adequate private and front recreation area and narrow streets since the two specific plans are being developed by the same architect, Moule & Polyzoides. Form based code will further limit the variation in distinctive qualities and characteristics of the two neighborhoods.

[7] What is a walkable neighborhood?, http://www.walkableneighborhoods.com/whatis/what-is-a-walkable-neighborhood

Slide 8



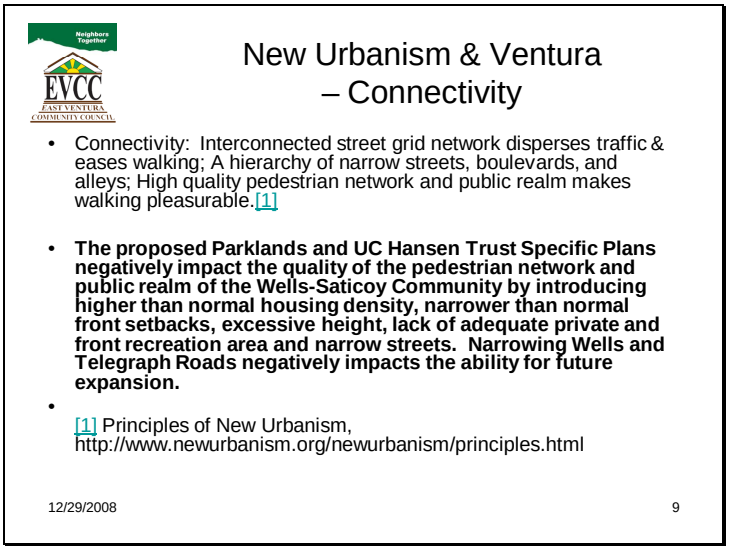
10.84

Walkability: Most things within a 10-minute walk of home and work; Pedestrian friendly street design (buildings close to street; porches, windows & doors; tree-lined streets; on street parking; hidden parking lots; garages in rear lane; narrow, slow speed streets); and Pedestrian streets free of cars in special cases.[8]

The proposed Parklands and UC Hansen Trust Specific Plan neighborhoods do not meet the new urbanism walkability requirements since there are no public schools, places of work, grocery stores, churches, retail shops of drug stores within walking distance of the parcels. Alley loaded garages enable developers to develop narrower lots and have no relationship to the pedestrian friendliness of the street. An average of only 0.4 vehicles per hour would cross over the sidewalk at the standard vehicle trip generation rate of 10 vehicle trips per day.

[8]Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 9



10.84

Connectivity: Interconnected street grid network disperses traffic & eases walking; A hierarchy of narrow streets, boulevards, and alleys; High quality pedestrian network and public realm makes walking pleasurable. [9]

The proposed Parklands and UC Hansen Trust Specific Plans negatively impact the quality of the pedestrian network and public realm of the Wells-Saticoy Community by introducing higher than normal housing density, narrower than normal front setbacks, excessive height, lack of adequate private and front recreation area and narrow streets. Narrowing Wells and Telegraph Roads negatively impacts the ability for future expansion.

[9] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 10

10.84

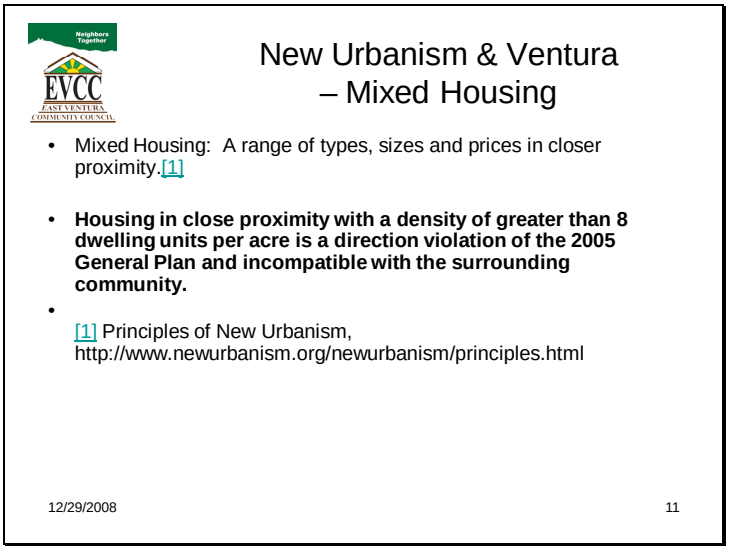
Mixed-Use & Diversity: A mix of shops, offices, apartments, and homes on site; Mixed-use within neighborhoods, within blocks, and within buildings; and, Diversity of people - of ages, income levels, cultures, and races[10]

Livable Neighborhoods are compact, well-designed, sustainable communities designed to enhance local identity, provide diverse housing options, increase land use efficiency, increase local employment and support alternative travel modes.[11] A sufficiently large population, housing and economic base within a small radius is required in order for to neighborhood to contain a mix of shops, offices, apartments, and homes on site, increase local employment and support alternative travel modes, for which none of these characteristics exist in the Saticoy-Wells community. Creating neighborhood with a diversity of people with different ages, income levels, cultures, and races is a social engineering goal which is not consistent with human behavior where people of different ages, income levels, cultures, and races tend to congregate and socialize together own social groups.

[10] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

[11] TDM Encyclopedia, http://www.vtpi.org/tdm/tdm24.htm

Slide 11



10.84

Mixed Housing: A range of types, sizes and prices in closer proximity.[12]

Housing in close proximity with a density of greater than 8 dwelling units per acre is a direction violation of the 2005 General Plan and incompatible with the surrounding community.

[12] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 12

10.84

Quality Architecture & Urban Design: Emphasis on beauty, aesthetics, human comfort, and creating a sense of place; Special placement of civic uses and sites within community. Human scale architecture & beautiful surroundings nourish the human spirit.[13]

Higher than normal housing density, narrower than normal front setbacks, excessive height, lack of adequate private and front recreation area and narrow streets detract from human scale architecture and beautiful surroundings. Form Based Coding creates neighborhoods where the maximum sizes form is placed on the smallest size site creating unattractive neighborhoods repetitious neighborhoods.

[13] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 13

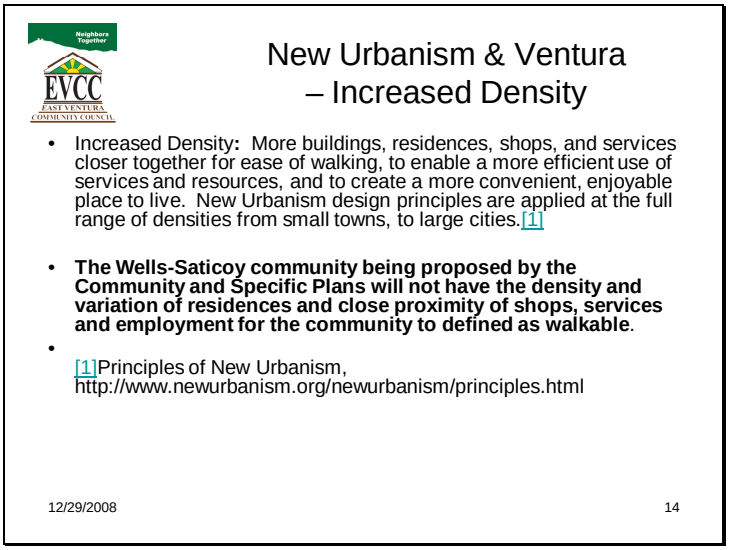
10.84

Traditional Neighborhood Structure**:** Discernable center and edge; Public space at center; Importance of quality public realm; public open space designed as civic art; Contains a range of uses and densities within 10-minute walk. Transect planning: Highest densities at town center; progressively less dense towards the edge. The transect is an analytical system that conceptualizes mutually reinforcing elements, creating a series of specific natural habitats and/or urban lifestyle settings. The Transect integrates environmental methodology for habitat assessment with zoning methodology for community design. The professional boundary between the natural and man-made disappears, enabling environmentalists to assess the design of the human habitat and the urbanists to support the viability of nature. This urban-to-rural transect hierarchy has appropriate building and street types for each area along the continuum.[14]

The Parklands and UC Hansen Trust Specific Plans and the Wells-Saticoy Community Plan fail to follow the concepts of the transect.

[14] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 14



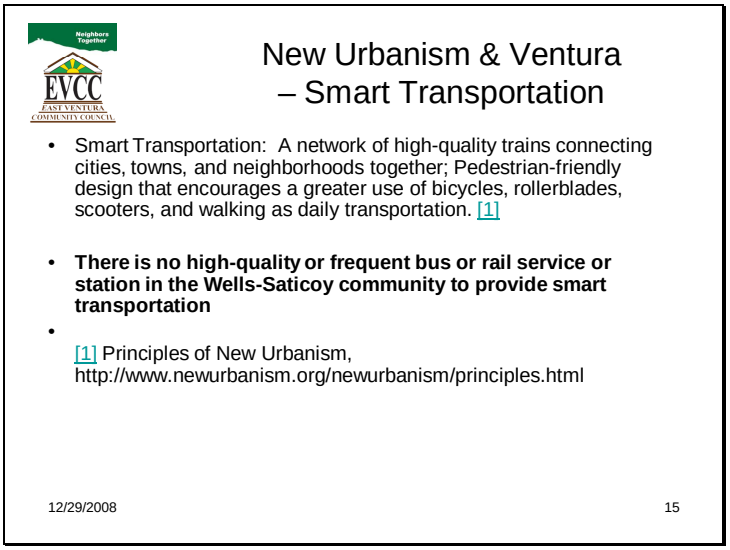
10.84

Increased Density**:** More buildings, residences, shops, and services closer together for ease of walking, to enable a more efficient use of services and resources, and to create a more convenient, enjoyable place to live. New Urbanism design principles are applied at the full range of densities from small towns, to large cities.[15]

The Wells-Saticoy community being proposed by the Community and Specific Plans will not have the density and variation of residences and close proximity of shops, services and employment for the community to defined as walkable.

[15] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 15



10.84

Smart Transportation: A network of high-quality trains connecting cities, towns, and neighborhoods together; Pedestrian-friendly design that encourages a greater use of bicycles, rollerblades, scooters, and walking as daily transportation.[16]

There is no high-quality nor frequent bus or rail service or station in the Wells-Saticoy community to provide smart transportation

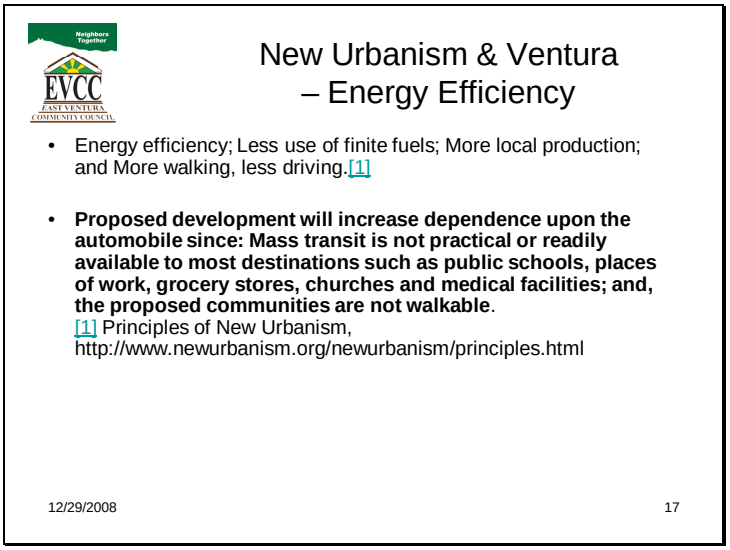
[16] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 16

10.84

Sustainability: Minimal environmental impact of development and its operations; Eco-friendly technologies, respect for ecology and value of natural systems;

Slide 17



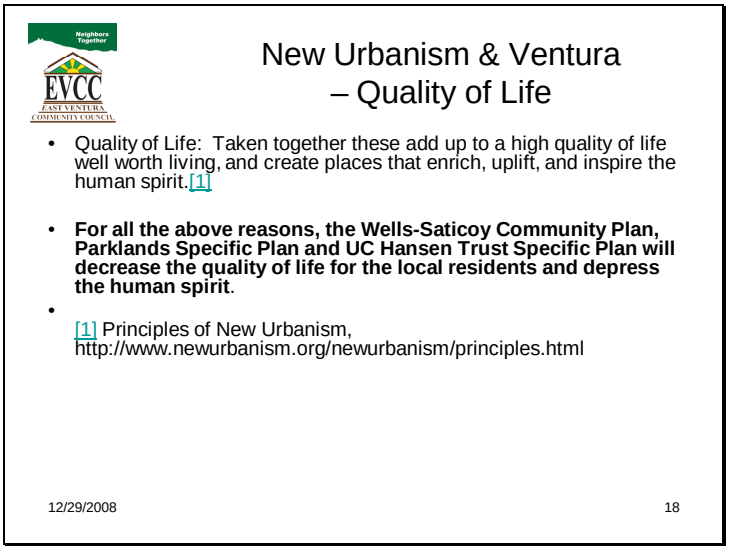
10.84

Energy efficiency; Less use of finite fuels; More local production; and More walking, less driving.[17]

Proposed development will increase dependence upon the automobile since: Mass transit is not practical or readily available to most destinations such as public schools, places of work, grocery stores, churches and medical facilities; and, the proposed communities are not walkable.

[17] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

Slide 18



10.84

Quality of Life: Taken together these add up to a high quality of life well worth living, and create places that enrich, uplift, and inspire the human spirit.[18]

For all the above reasons, the Wells-Saticoy Community Plan, Parklands Specific Plan and UC Hansen Trust Specific Plan will decrease the quality of life for the local residents and depress the human spirit.

[18] Principles of New Urbanism, http://www.newurbanism.org/newurbanism/principles.html

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

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The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

Determinants of walkability are not discussed.

Walkability and the proximity of sources for retail goods and services are not discussed.

Increase in greenhouse gases created by the distant relationship of sources of retail goods and services and the need for transportation to access those sources is not discussed.

The above statements are substantiated by information contained in the attached slides.

Slide 1

Neighbors Together
Parklands Environmental Impact Report
EIR-2459
Review Comments
Part 04
Walkability & Retail
EVCC
EAST VENTURA COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
28 Dec 2008
Working Towards The Future
12/28/2008
Part 04 – Walkability & Retail
1

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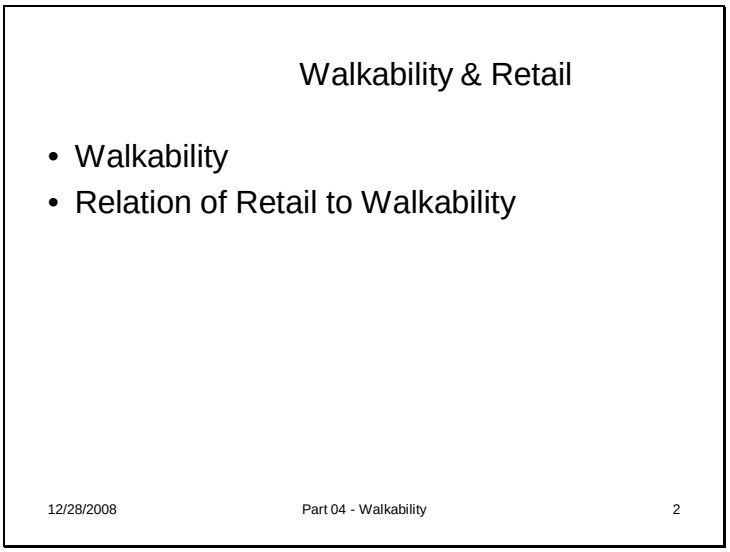
Slide 2

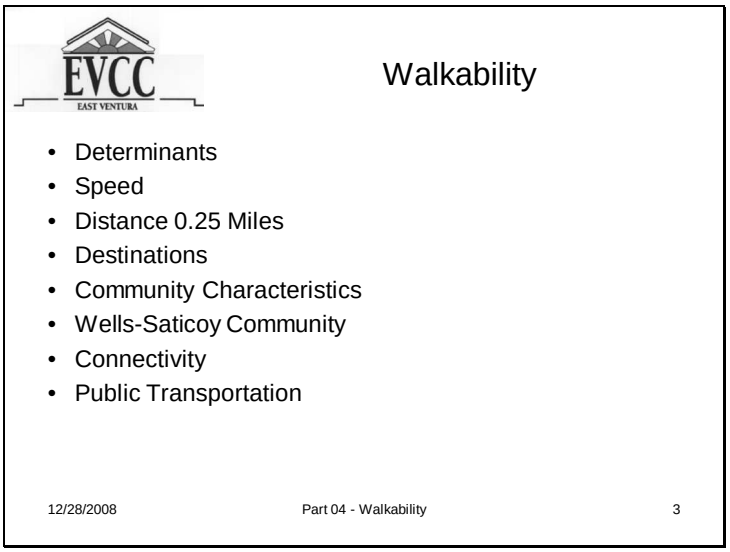


10.84

Walkability & Retail

Walkability
Relation of Retail to Walkability

Slide 3

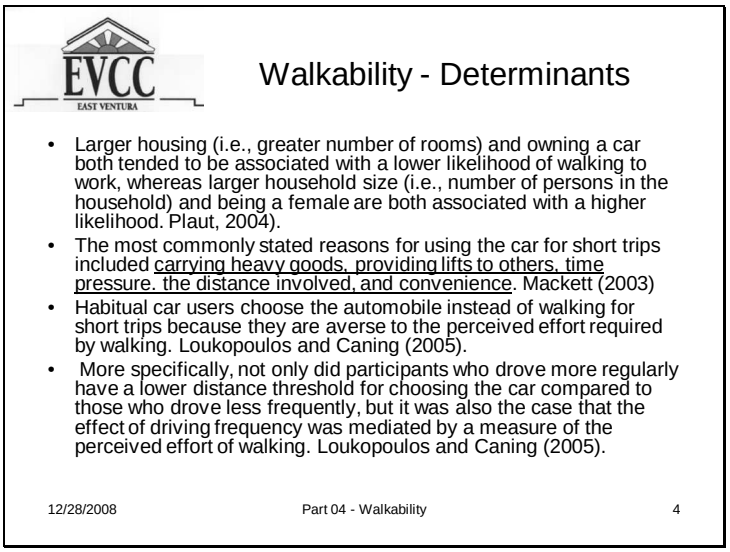


10.84

Walkability

Determinants
Speed
Distance 0.25 Miles
Destinations
Community Characteristics
Wells-Saticoy Community
Connectivity
Public Transportation

Slide 4

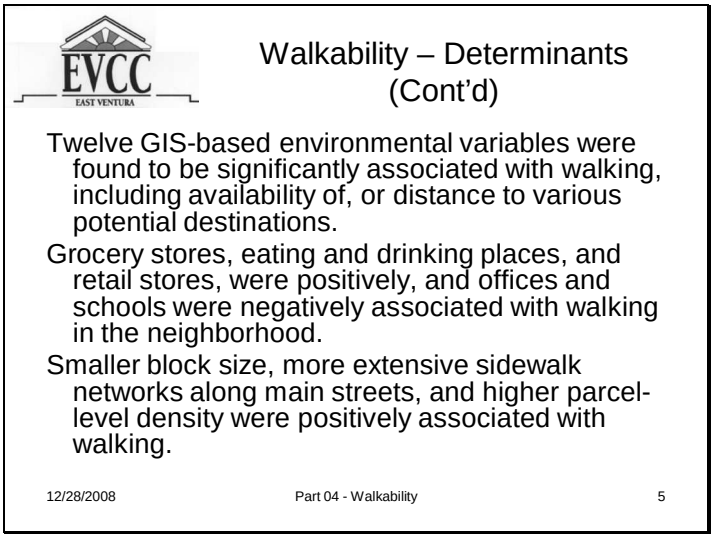


10.84

Larger housing (i.e., greater number of rooms) and owning a car both tended to be associated with a lower likelihood of walking to work, whereas larger household size (i.e., number of persons in the household) and being a female are both associated with a higher likelihood. Plaut, 2004).
The most commonly stated reasons for using the car for short trips included carrying heavy goods, providing lifts to others, time pressure. the distance involved, and convenience. Mackett (2003)
Habitual car users choose the automobile instead of walking for short trips because they are averse to the perceived effort required by walking. Loukopoulos and Caning (2005).
More specifically, not only did participants who drove more regularly have a lower distance threshold for choosing the car compared to those who drove less frequently, but it was also the case that the effect of driving frequency was mediated by a measure of the perceived effort of walking. Loukopoulos and Caning (2005).[1]

[1] Ref: Choice of Driving vs Walking Related to Cognitive Distance, Garling and Loukopoulos

Slide 5

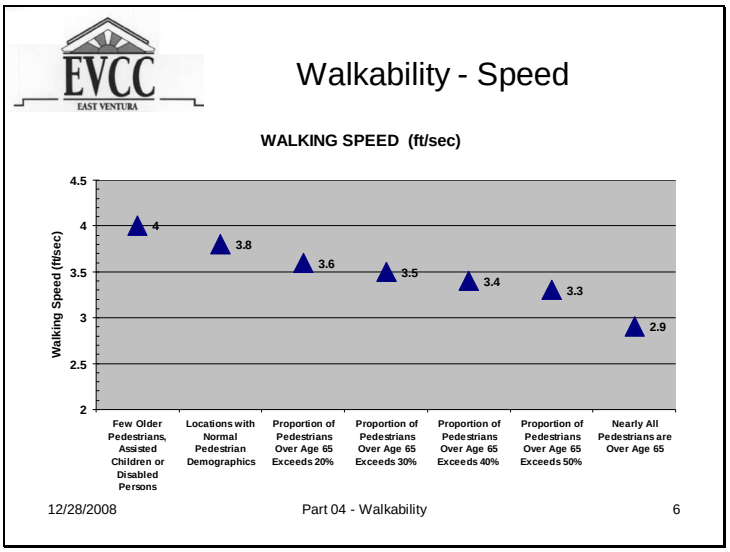


10.84

Twelve GIS-based environmental variables were found to be significantly associated with walking, including availability of, or distance to various potential destinations.
Grocery stores, eating and drinking places, and retail stores, were positively, and offices and schools were negatively associated with walking in the neighborhood.
Smaller block size, more extensive sidewalk networks along main streets, and higher parcel-level density were positively associated with walking.[2]

[2] Ref: TWO INSTRUMENTS TO SCORE ENVIRONMENTS FOR NEIGHBORHOOD WALKABILITY, November 15, 2005, Anne Vernez Moudon, Dr. es Sc., University of Washington, http://depts.washington.edu/hprc/docs/pr_walk_intro.pdf

Slide 6



10.84

Recommended Walking Speeds (Gates, Noyce, and Bill, 2006)
A study of people crossing urban intersections found that pedestrians over the age of 65, children hand-assisted by adults, people with physical disabilities, and groups of two or more pedestrians cross slower on average than the 4.0 feet-per-second (ft/s) walking speed standard commonly used for crosswalks and other pedestrian facilities. Based on this study the researchers recommend the following:

A walking speed of 4.0 ft/s is appropriate only for locations with very few older pedestrians, assisted children, or disabled persons, such as college campuses.

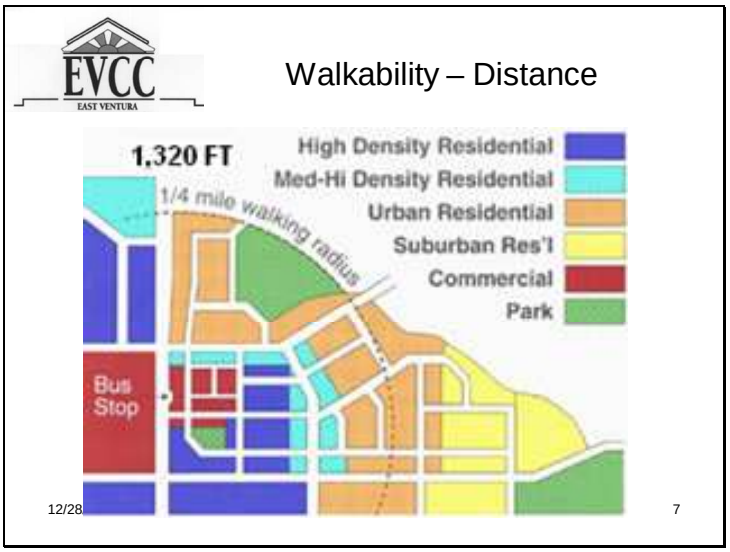
A walking speed of 3.8 ft/s is recommended for timing pedestrian clearance intervals at locations with normal pedestrian demographics (i.e., downtown areas, shopping areas, most neighborhoods, schools areas) or locations where the age or physical disability status of the pedestrian population is unknown.

When the proportion of pedestrians over the age of 65 exceeds 20%, 30%, 40%, and 50% of the total pedestrians at a location, walking speeds of 3.6, 3.5, 3.4, and 3.3 ft/s, respectively, are recommended.

A walking speed of 2.9 ft/s is recommended for intersections where nearly all of the pedestrians are over age 65[3]

[3] Ref: Walkability Improvements, *Strategies to Make Walking Convenient, Safe and Pleasant, TDM Encyclopedia,* Victoria Transport Policy Institute, (http://www.vtpi.org/tdm/tdm92.htm)

Slide 7



10.84

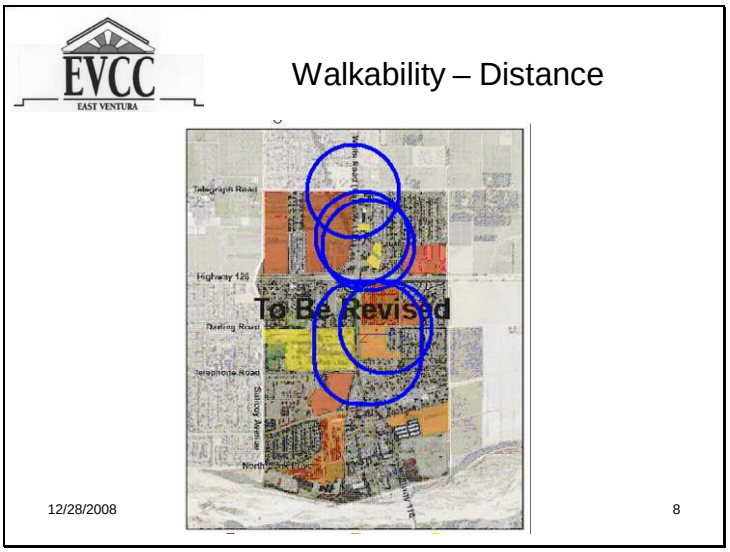
Loukopoulos and Gärling (2005) find that on average people will drive rather than walk for a distance over 1,236 meters **(4,055 ft),** with higher walking thresholds for women, and people who frequently walk, and lower values for more difficult walking conditions and people who frequently drive. The authors conclude that improving walking conditions and marketing campaigns can decrease the frequency of short automobile

Studies have shown that 50 % of the local population in Perugia consider 600 meters **(1,968 ft)** or more to be an acceptable walking distance.[4]

Note: **Bold** font added for clarity & comparison purposes.

[4] Ref: Walkability Improvements, *Strategies to Make Walking Convenient, Safe and Pleasant, TDM Encyclopedia,* Victoria Transport Policy Institute (http://www.vtpi.org/tdm/tdm92.htm)

Slide 8

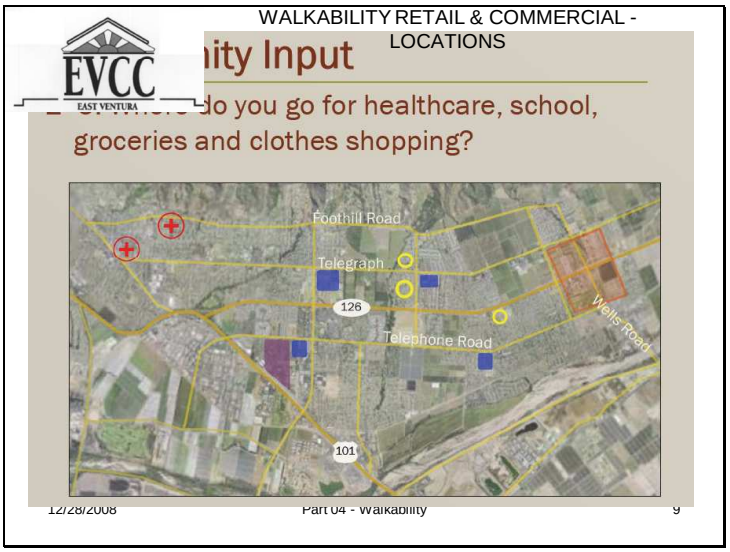


10.84

Location of retail and commercial destinations within a ¼ mile walking radius.[5]

[5] Ref: Wells-Saticoy Community Plan Draft 2007 02 06

Slide 9



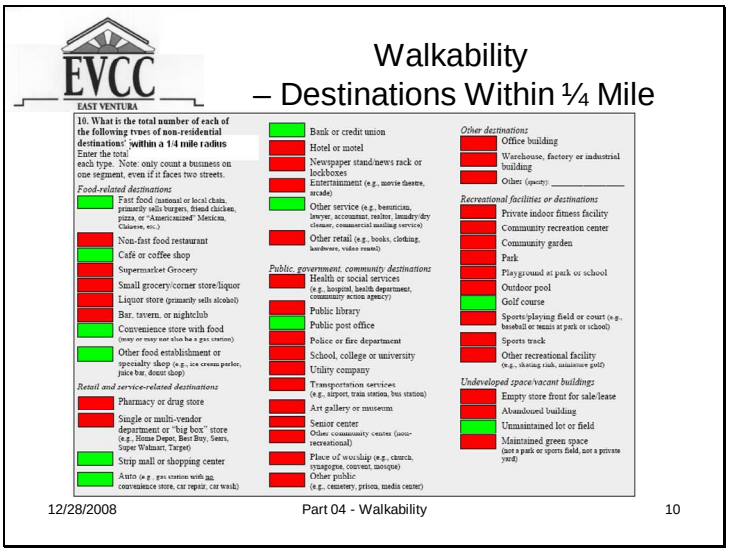
10.84

The City of San Buenaventura Wells-Saticoy Community Plan Background Report showed that the residents of the Wells-Saticoy Community travel outside of the local community for meeting their healthcare and educational needs and for purchasing their retail and commercial goods and services.[6]

Where residents travel for healthcare, school, groceries and clothes shopping is not within a walkable distance of where residents of the Wells-Saticoy Community.

[6] Ref: City of San Buenaventura Wells-Saticoy Community Plan Background Report.

Slide 10

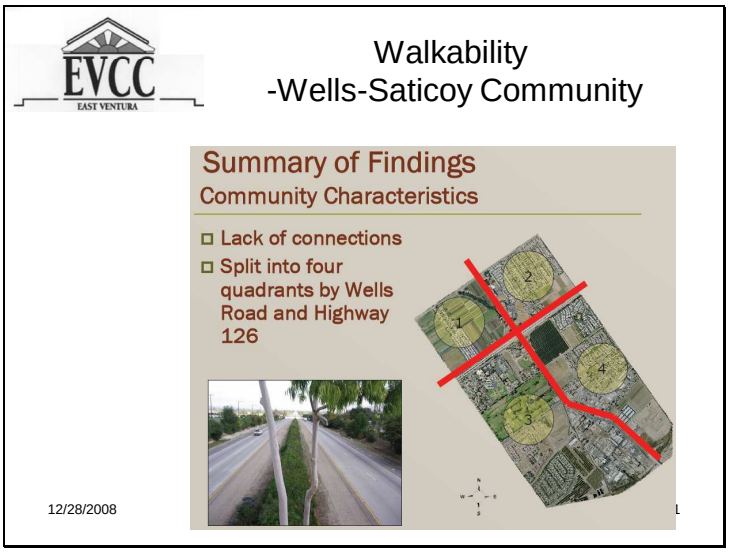


10.84

There are only 11 of the 48 non-residential destinations located within the ¼ mile walkability radius for most of the Wells-Saticoy Community Plan area which excludes the Town of Saticoy.[7]

[7] Ref: Prevention Research Centers-Healthy Aging Research Network Audit Tool in collaboration with Saint Louis University School of Public Health.

Slide 11

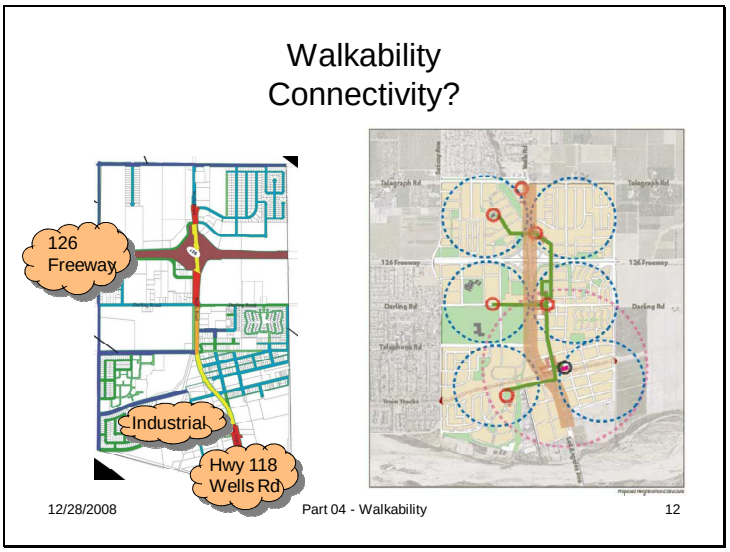


10.84

-Most things within a 10-minute walk of home and work.

- Residents do not both live and work within a 10-minute walk. Single and multi-family residential land uses where people live are segregated from office, commercial, medical, industrial, retail and recreational use zones where people generally are employed and round trip travel from home to work is accomplished by a majority of the workers by single person occupied automobiles.

Slide 12

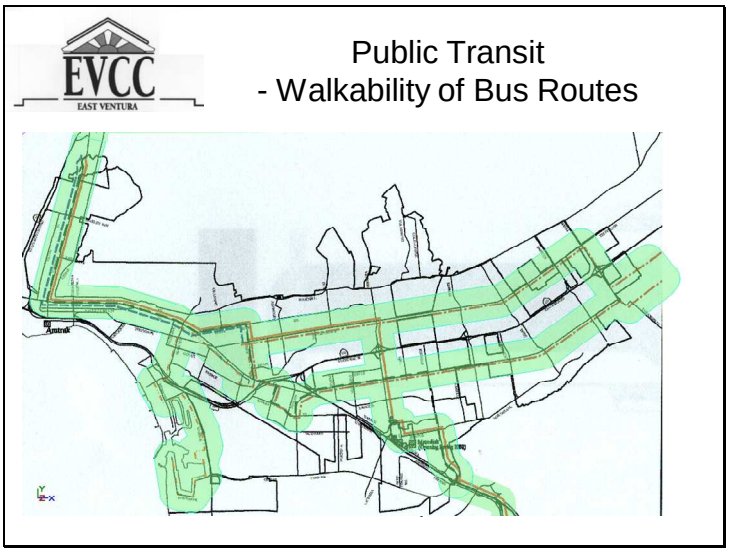


10.84

Walkability & Connectivity

The Wells-Saticoy Community is bifurcated into four quadrants by the 126 Freeway and Wells Road which inhibits connectivity between neighborhoods.

Slide 13



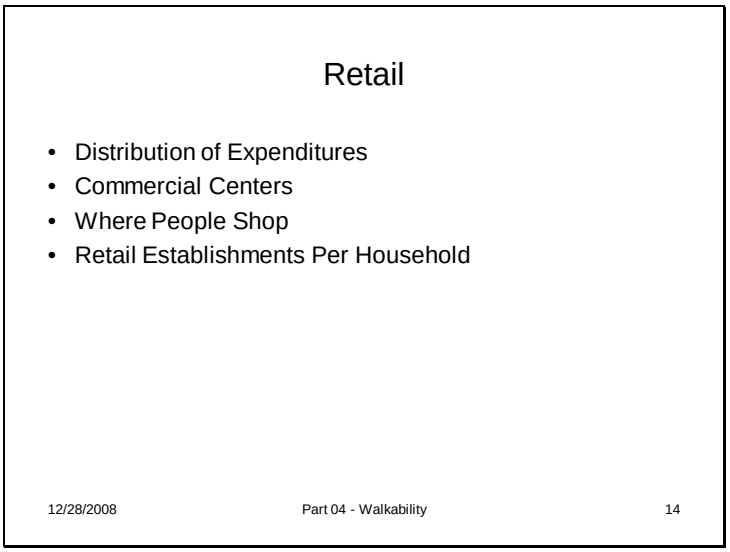
10.84

Public Transit - Walkability of Bus Routes

It is estimated that at least one half of the residents do not live within a walkable distance from a public bus stop.[8]
The terrain slopes in neighborhoods above Foothill Road or Poli Street prevent making bus stops walkable.

[8] Source: SCAT Map

Slide 14

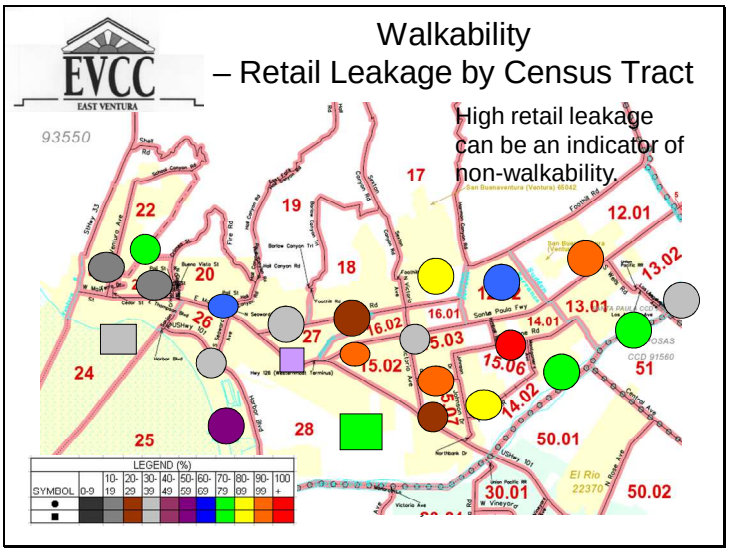


10.84

Retail

Distribution of Expenditures
Commercial Centers
Where People Shop
Retail Establishments Per Household

Slide 15

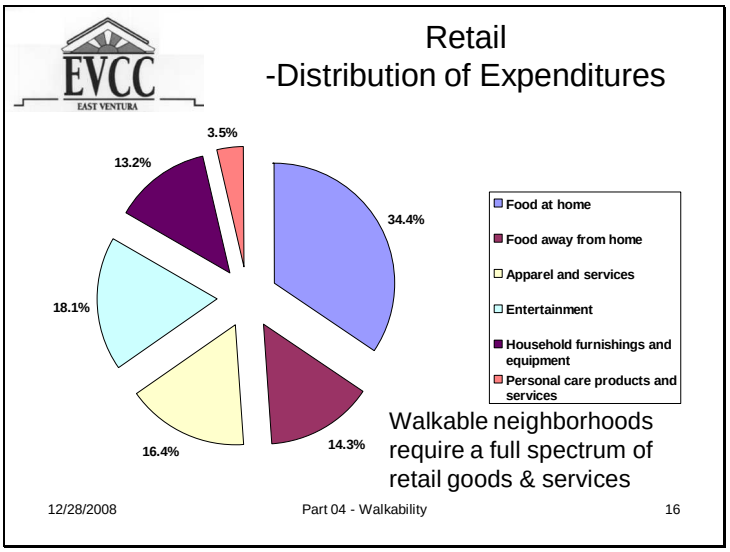


10.84

Analysis of retail leakage data from each of the census tracts in the City of San Buenaventura reveals, with the exception of the Town of Saticoy, that all of East Ventura has a retail leakage of over 60%. In other words, travel outside of the local community is required for purchasing most needed retail goods and services.[9]

[9] Ref: Economic Census 2000 ZIP Code Data

Slide 16



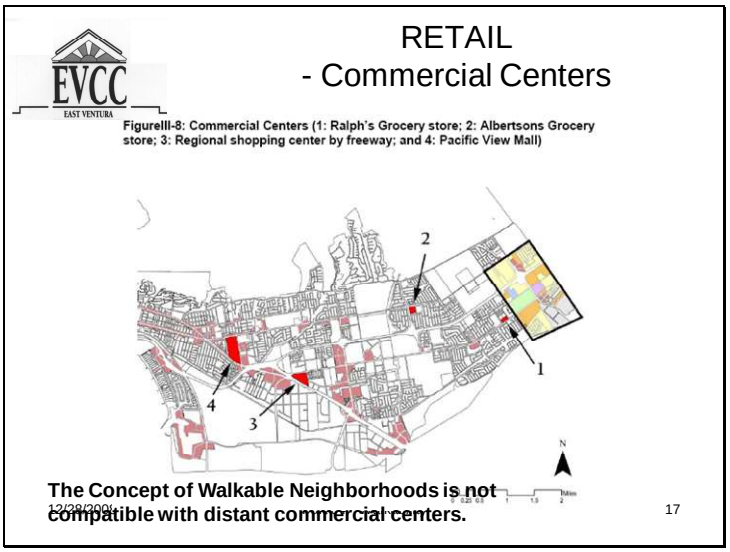
10.84

Distribution of expenditures for retail goods and services.[10]

Walkable neighborhoods require a full spectrum of retail goods & services which are not available in the Wells-Saticoy Community.

[10] Ref: Exposing Urban Legends: The Real Purchasing Power of Central City Neighborhoods, University of Wisconsin-Milwaukee Employment & Training Institute.

Slide 17



10.84

RETAIL - Commercial Centers

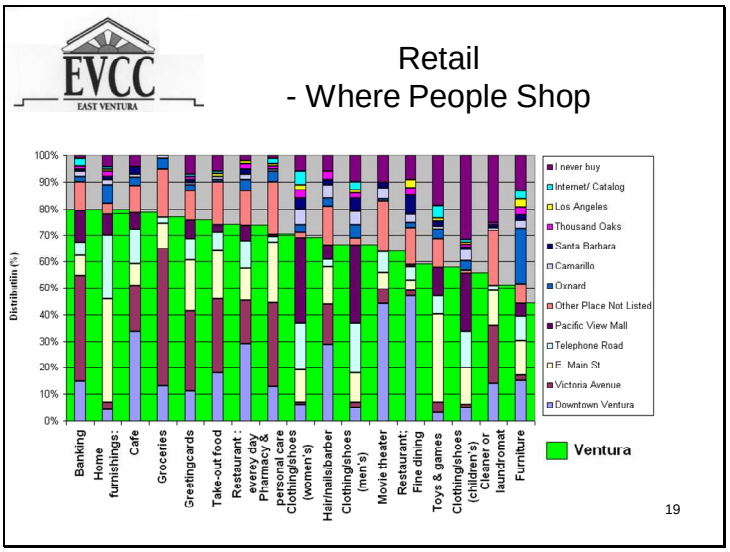
The Concept of Walkable Neighborhoods is not compatible with distant commercial centers.

Slide 18

10.84

A Map of Retail Locations illustrated most retail locations are located along the Main Street of Victoria Avenue Corridors.

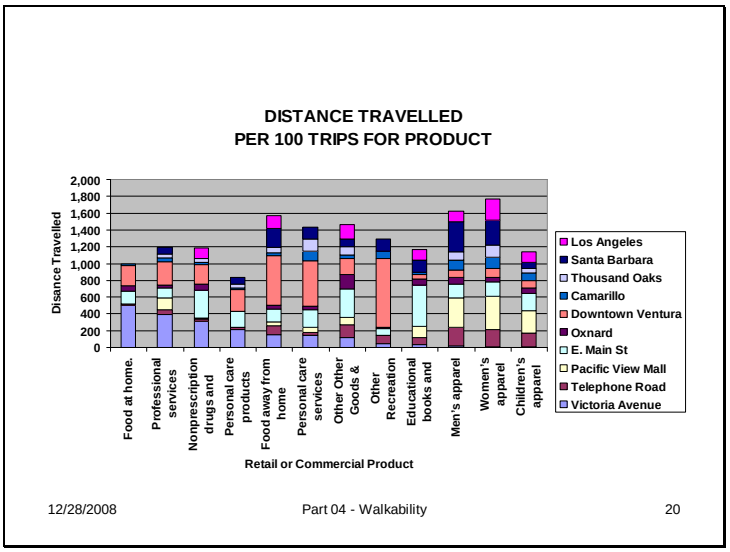
Slide 19



10.84

People do less than 80% of their shopping in Ventura with almost 50% being either in Downtown or along Victoria Avenue.

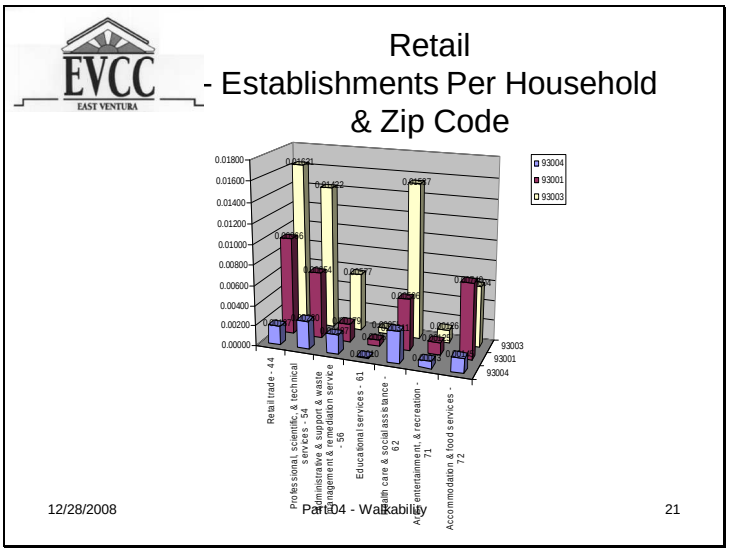
Slide 20



10.84

Use of the automobile is required to obtain needed retail and commercial products which are not locally availability creating an adverse impact on the environment.

Slide 21



10.84

Retail Establishments Per Household & Zip Code data Illustrates a low percentage of retail establishments being located in ZIP Code 93004.[11]

[11] Source Data: 2002 Economic Census Data for ZIP Codes 93001, 93003 & 03004
2000 US Census General Demographics for Zip Codes 93001, 93003 & 93004.

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

The EIR does not describe the environmental impact of the proposed residential development on the public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment to the residents of the City of San Buenaventura.

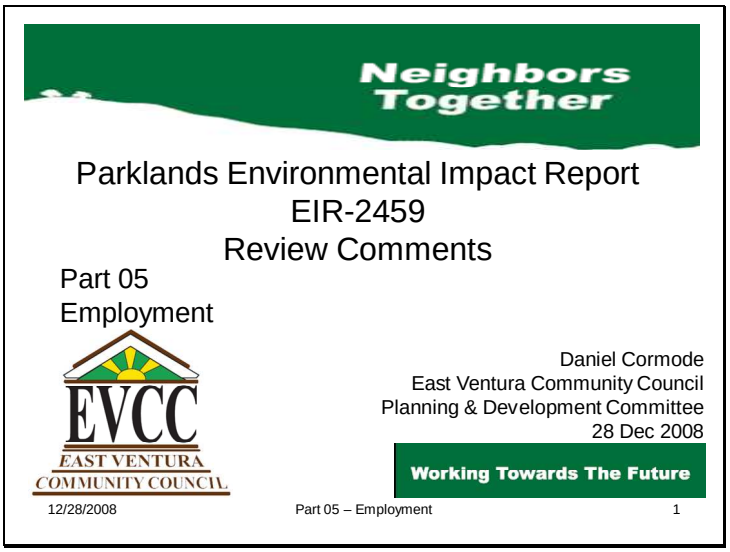
The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment. 10.85

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development on the subject area of concern.

The EIR does not address the location of the proposed residential development and its relationship to distant sources of employment and the environmental impact of the need to use private modes of transportation to obtain employment nor does the EIR address the adverse impact on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32

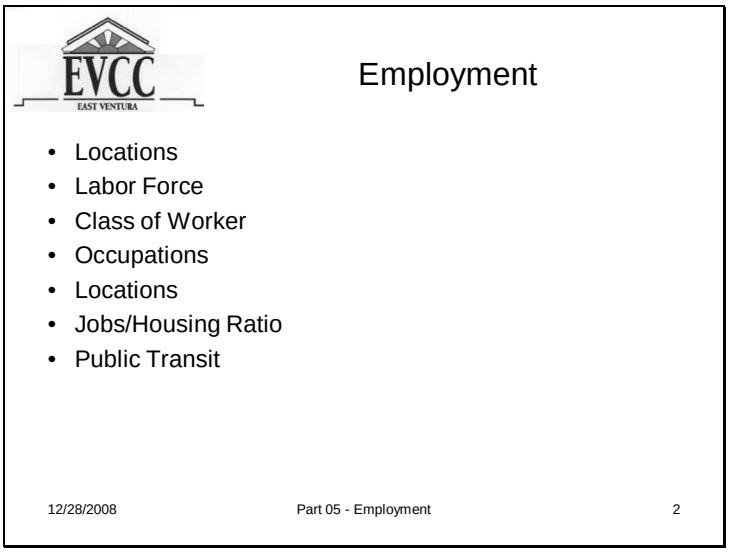
The above statements are substantiated by information contained in the attached slides.

Slide 1


Neighbors Together
Parklands Environmental Impact Report
EIR-2459
Review Comments
Part 05
Employment
EVCC
EAST VENTURA
COMMUNITY COUNCIL
Daniel Cormode
East Ventura Community Council
Planning & Development Committee
28 Dec 2008
Working Towards The Future
12/28/2008
Part 05 – Employment
1

10.86

Slide 2

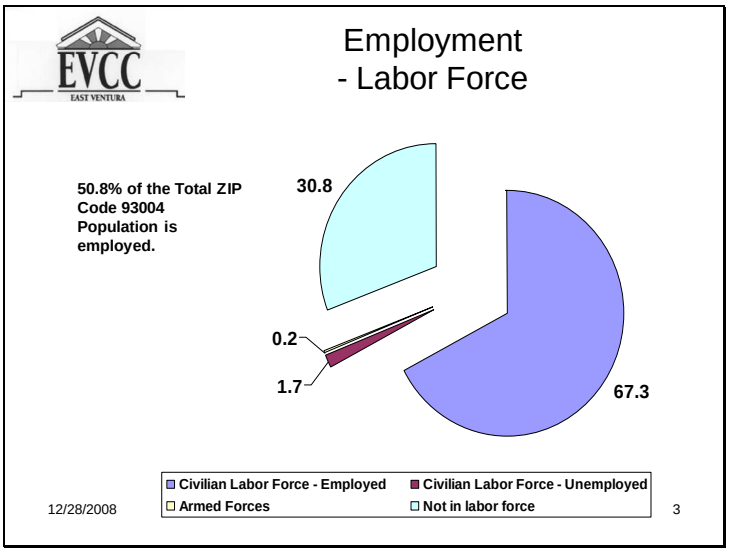


10.86

Employment

Locations
Labor Force
Class of Worker
Occupations
Locations
Jobs/Housing Ratio
Public Transit

Slide 3



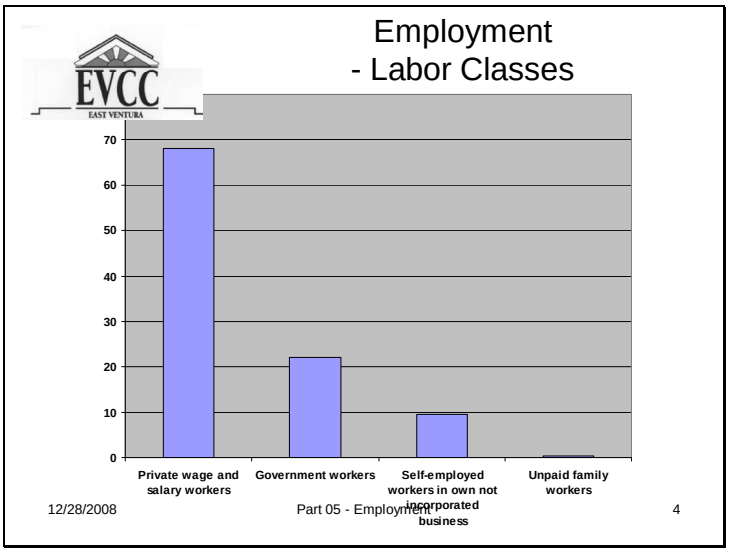
10.86

Employment - Labor Force

The Year 2000 US Census for ZIP Code 93004 reports the Employed Civilian Labor Force is 13,910 persons or **67.3%** of the total 20,662 persons aged 16 Years & Over Population are employed in ZIP Code 93004.[1]
The Employed Civilian Labor Force of 13,910 persons of the 16 Years & Over Population comprises **50.8**% of the 27,379 total population in the 93004 ZIP Code.
The resulting increase in population of 12,068 persons can be translated into an additional 6,130 employees residing in the City of San Buenaventura.
The resulting increase in population of 5,118 persons can be translated in an additional 2,600 employees residing in the Wells-Saticoy area.

[1] Source: US Census 2000 ZIP Code 93004

Slide 4

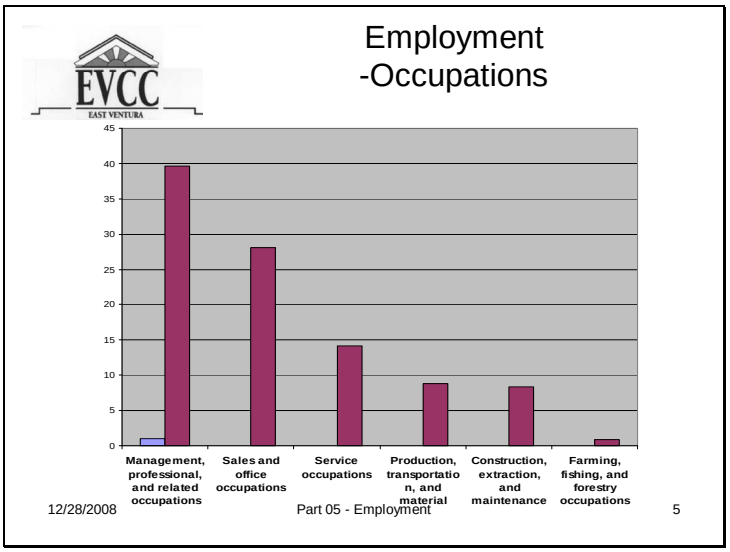


10.86

Classes of workers in the 93004 ZIP Code area.[2]

[2] Source: US Census 2000 ZIP Code 93004

Slide 5



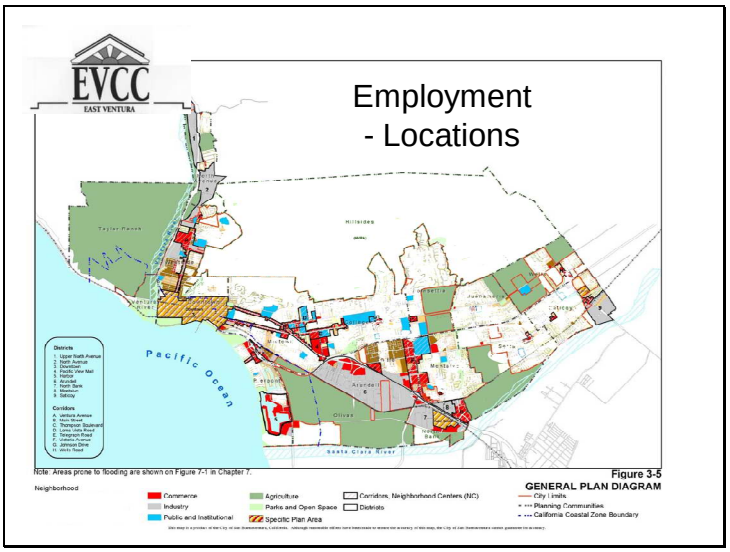
10.86

Employment –Occupations

Approximately 68% of the employees in the ZIP Code 93004 community are associated with the management, professional and related occupations or sales and office occupations.[3]

[3] Source: US Census 2000 ZIP Code 93004

Slide 6



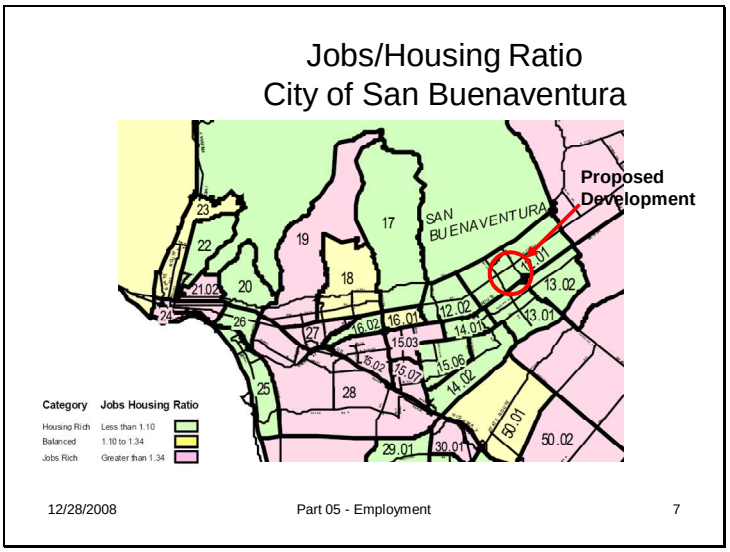
10.86

Employment - Locations

The above map illustrates that travel is required to the commercial, retail, schools and agricultural sources of employment which are outside of the Wells-Saticoy Community Plan area and are not walkable and practical for use of public transportation. [4]

[4] Ref: City of San Buenaventura 2005 General Plan Diagram.

Slide 7



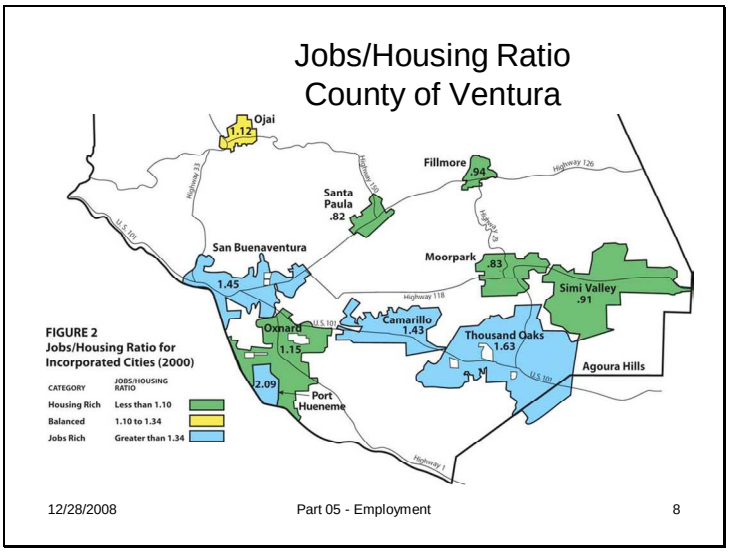
10.86

Jobs/Housing Ratio - City of San Buenaventura

New residential development is being located in an already housing rich census tracts away from the job rich census tracts.[5]

[5] Economic/Transit/Mixed Use Strategies For Housing Rich Communities - VENTURA COUNTY, June 2004

Slide 8

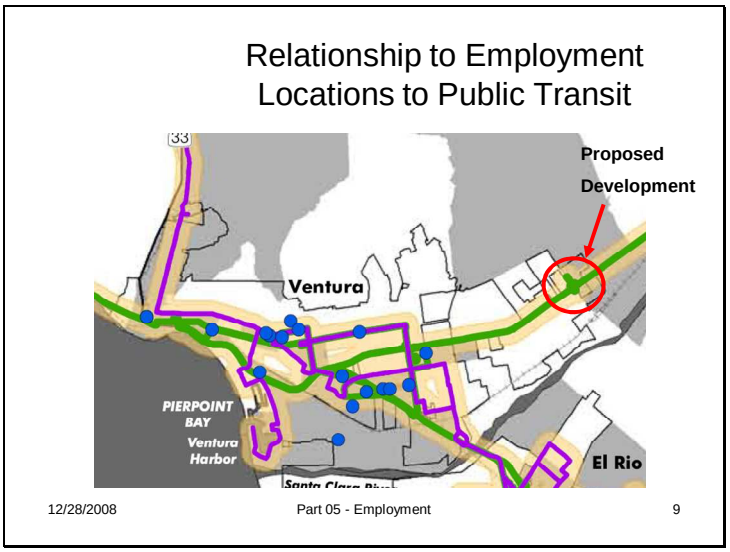


10.86

Jobs/Housing Ratio, County of Ventura[6]

[6] Economic/Transit/Mixed Use Strategies For Housing Rich Communities - VENTURA COUNTY, June 2004

Slide 9



Relationship to Employment Locations to Public Transit

New residential development is being located away from major employers where lower income households which are transit dependent and necessitates expenditure of additional energy resources to provide private motorized transportation from the place of residence to the place of employment.[7]

Public transit plays an important role in an analysis of impediments to fair housing. Public transit should link lower income households, which are often transit dependent, to major employers where many lower income persons may work and where job opportunities may exist. If an integral relationship between public transit, major employers, and lower income housing does not exist, fair housing choice will be impeded because persons who depend on public transit will be limited in their choice of where they can live.

10.86

[7] **Ventura County, Analysis of Impediments to Fair Housing Choice, April 2005**

SUMMARY

The Environmental Impact Report (EIR) for the proposed Parklands residential development fails to contain the following environmental impact report information in accordance with the requirements of Title 14, California Code of Regulations, Chapter 3.

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The EIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development on the environment. 10.87

The EIR are does not quantify the environmental effects based on scientific for factual data in order to determine the magnitude of the impact of the proposed residential development or the cumulative impact of proposed residential developments on the subject area of concern.

The EIR does not address the adverse impact of locating housing distant from work centers on the intent of Senate Bill 375 which requires metropolitan planning organizations to include sustainable communities strategies for the purpose of: reducing greenhouse gas emissions; aligning planning for transportation and housing; and makes findings and declarations concerning the need to make significant changes in land use and transportation policy in order to meet the greenhouse gas reduction goals established by Assembly Bill 32

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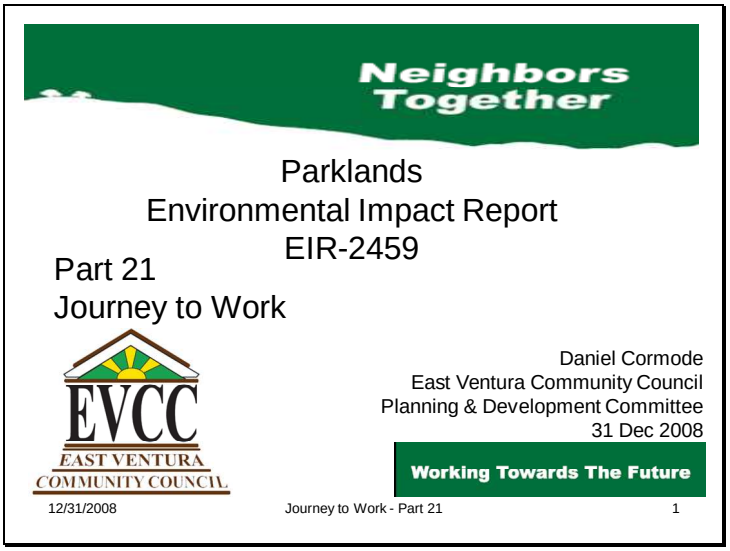
Slide 1


Neighbors Together
Parklands
Environmental Impact Report
EIR-2459
Part 21
Journey to Work
EVCC
EAST VENTURA
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Daniel Cormode
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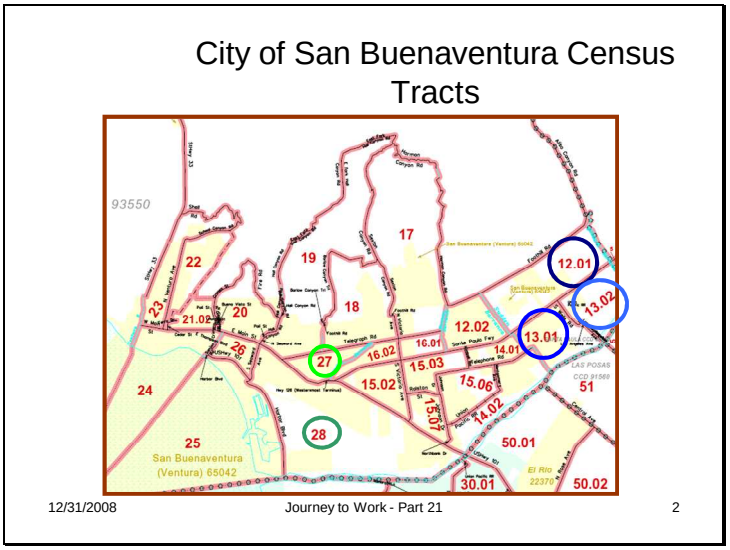
31 Dec 2008
Working Towards The Future
12/31/2008
Journey to Work - Part 21
1

10.88

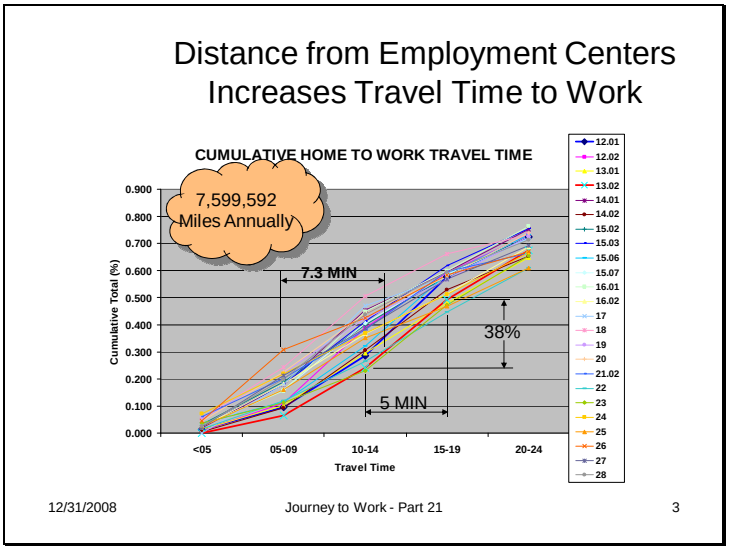
Slide 2



10.88

Relationship of housing rich areas (blue circle) to job rich areas (green circle) in the City of San Buenaventura

Slide 3



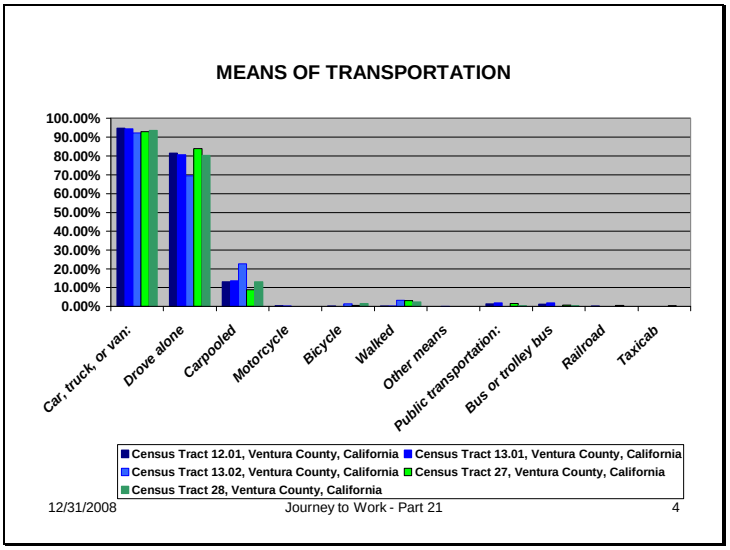
10.88

Cumulative Home to Work Travel Time;

•There is a difference of 7.3 minutes of additional travel time from home to work between workers living in the Wells-Saticoy area and those living closer to the Victoria and Midtown/Downtown employment centers.

•This equates to an additional 29,229 miles of daily travel or 7,599,592 miles annually for the 2,600 employees travelling daily an additional 7.3 minutes each way at an average speed of 46.3 miles per hour.

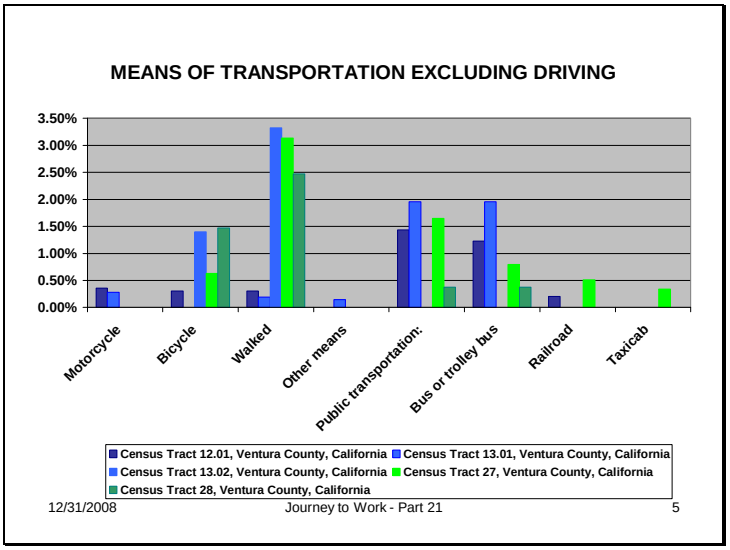
Slide 4



10.88

There appears to be not significant major statistical difference between those who use driving as a means of transportation in relation to the location of the employment centers.

Slide 5



10.88

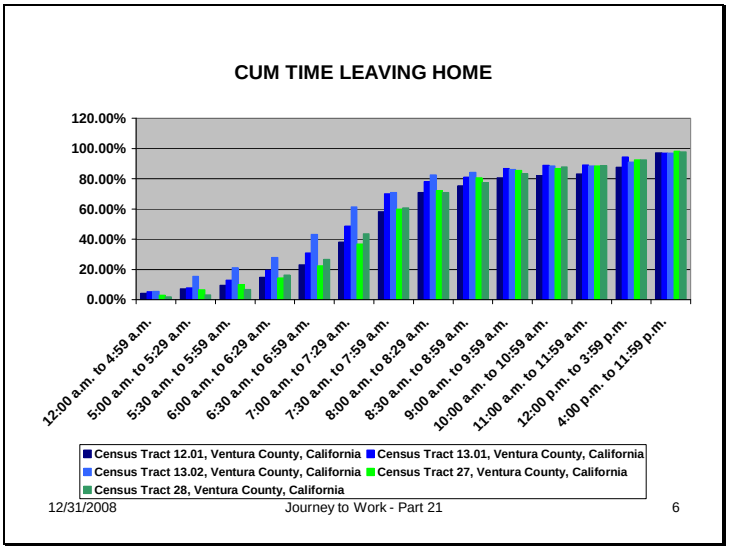
Means of Transportation Excluding Driving:

•The number of persons riding a bicycle to work is about 6 times greater than those persons living in the Wells-Saticoy area than those persons in Census Tracts 27 and 28 which are near employment centers.

•The number of persons walking to work is about 12 times greater than those persons living in the Wells-Saticoy area than those persons in Census Tracts 27 and 28 which are near employment centers.

•The number of persons riding a bus to work for those persons living in the Wells-Saticoy area is about twice those persons in Census Tracts 27 and 28 which are near employment centers.

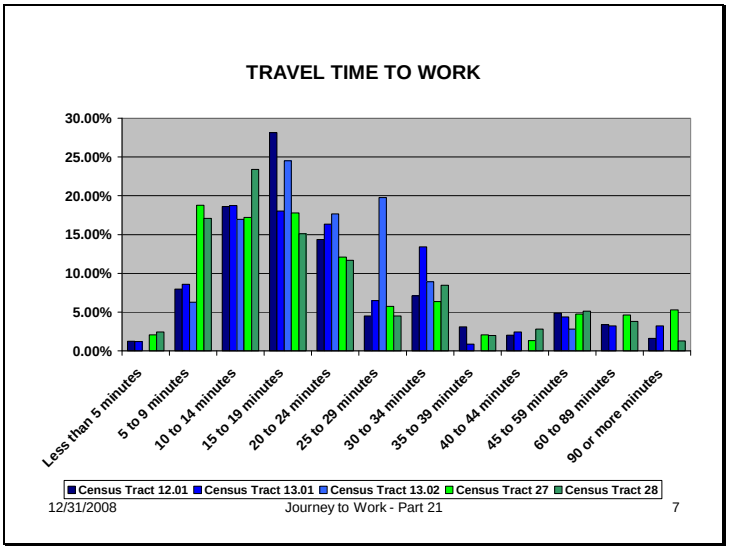
Slide 6



10.88

Data shows that those who live further from the centers of employment tend to leave earlier than those who live closer to the centers of employment.

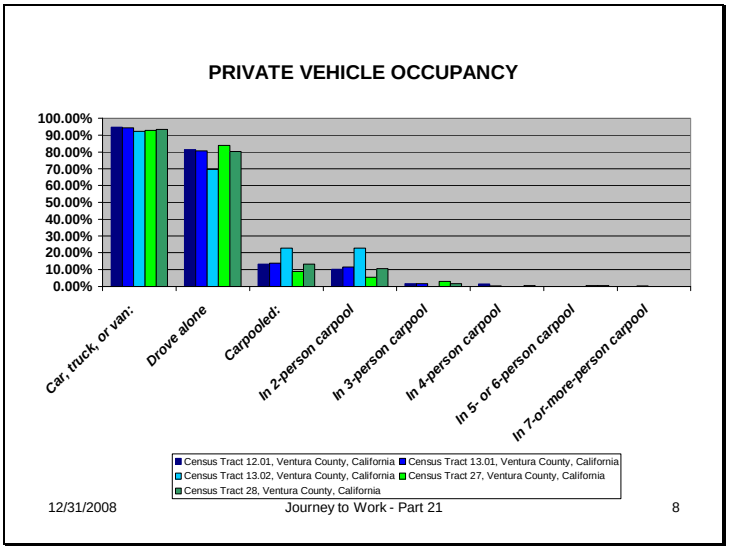
Slide 7



10.88

Data shows the travel time to work for those who live farther from center of employment is longer than those who live nearer to the centers of employment.

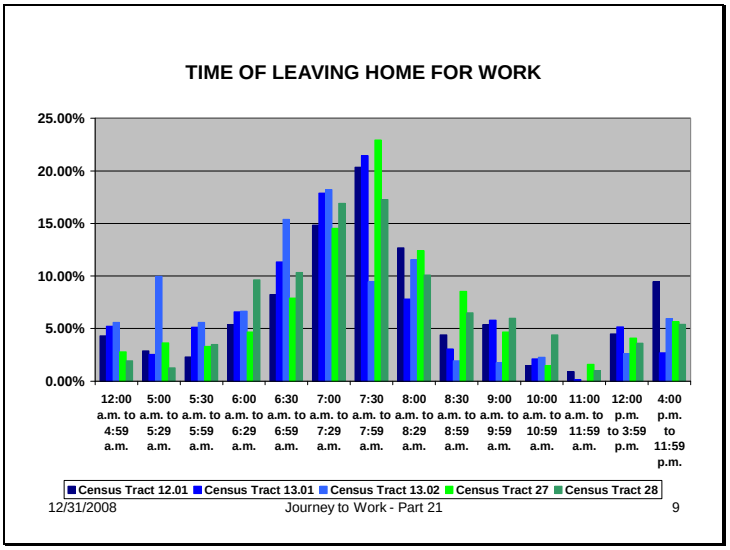
Slide 8



10.88

Data shows that there is no significant difference between vehicle occupancy and location.

Slide 9



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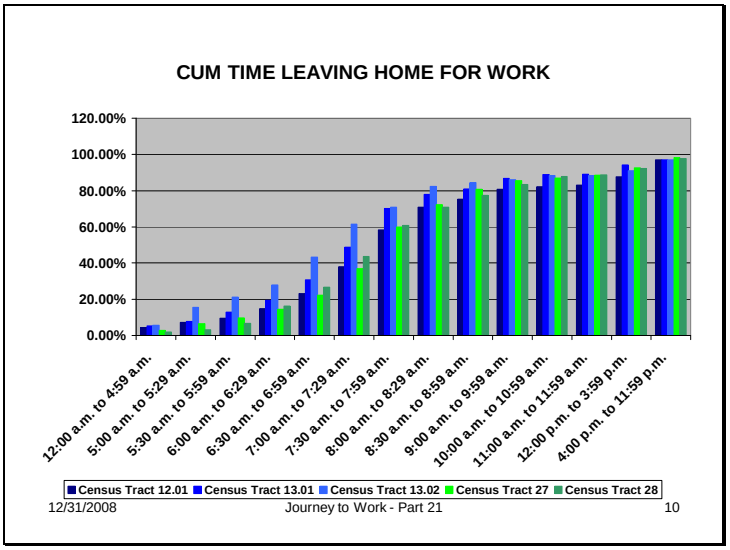

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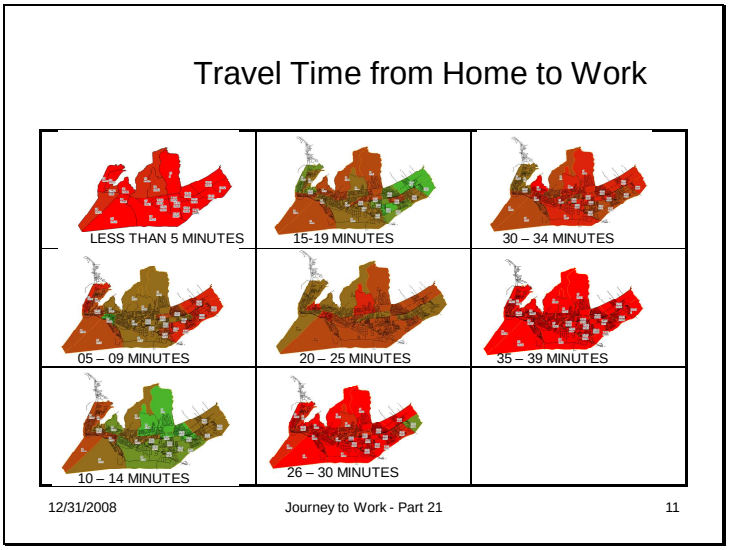

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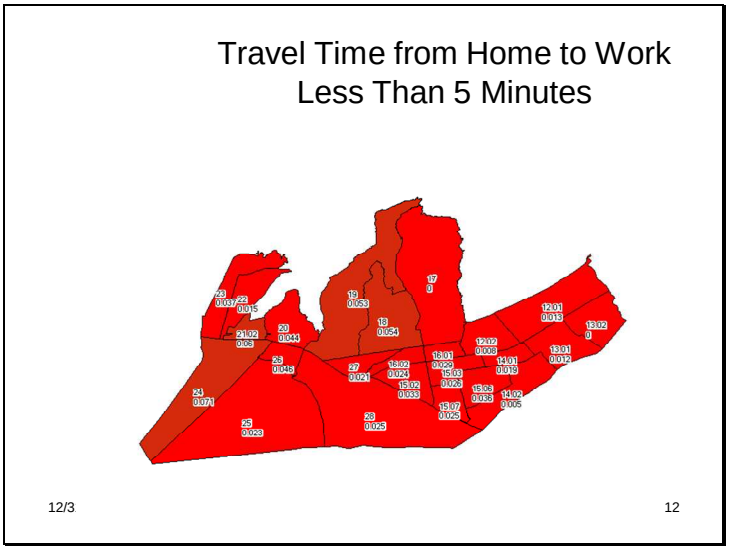

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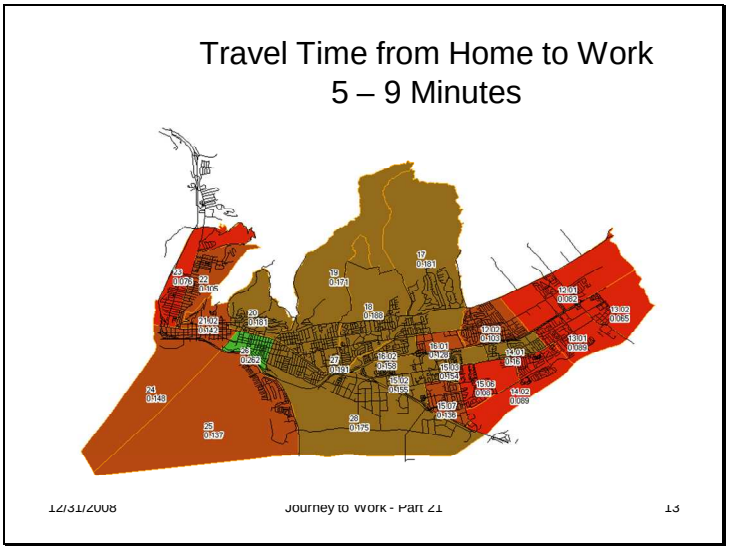
Slide 13



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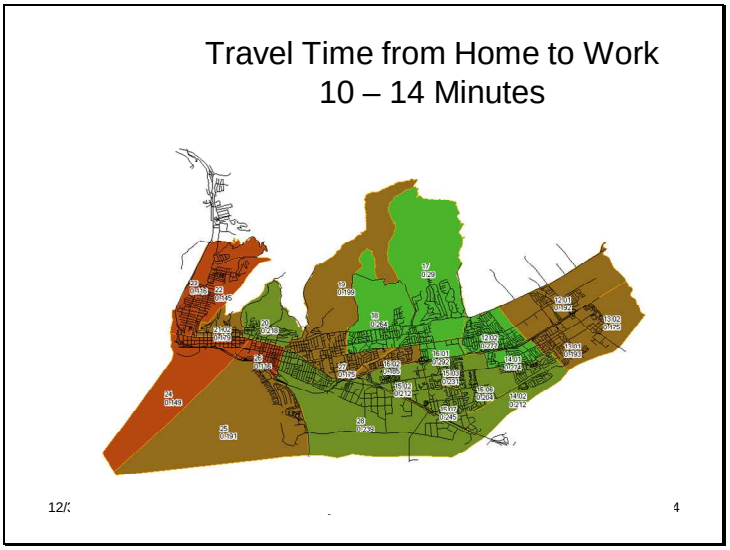
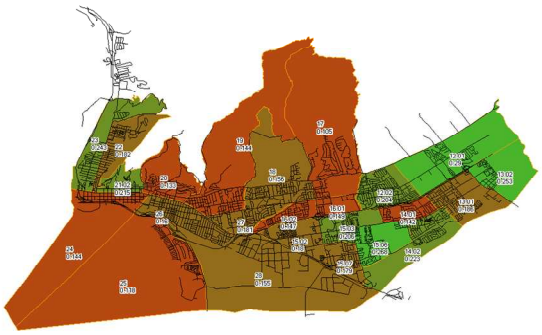
Slide 14



10.88

Slide 15

Travel Time from Home to Work
15-19 Minutes



12/31/2008 Journey to Work - Part 21 15

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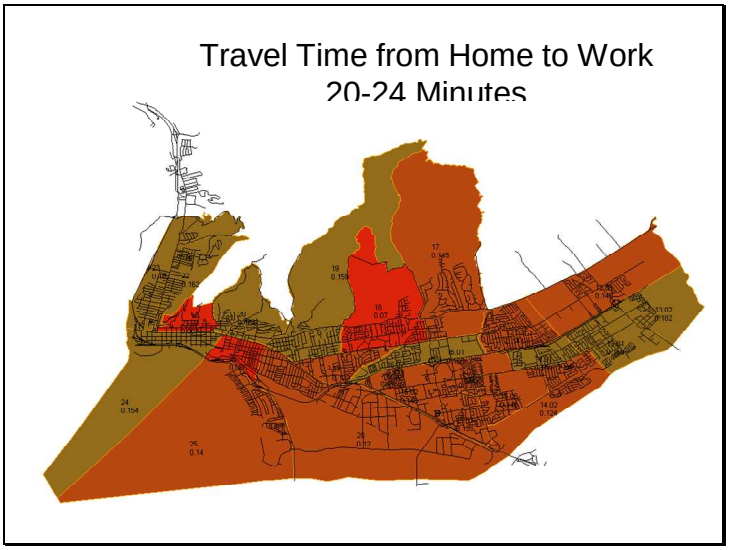
Slide 16



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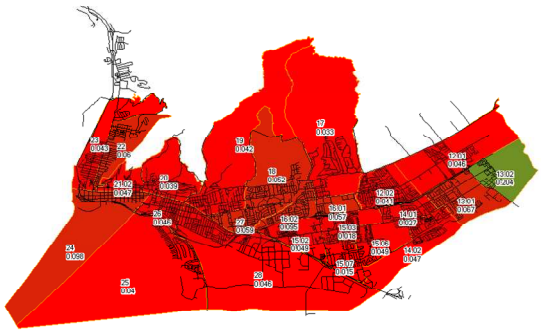
Travel Time from Home to Work
25-29 Minutes



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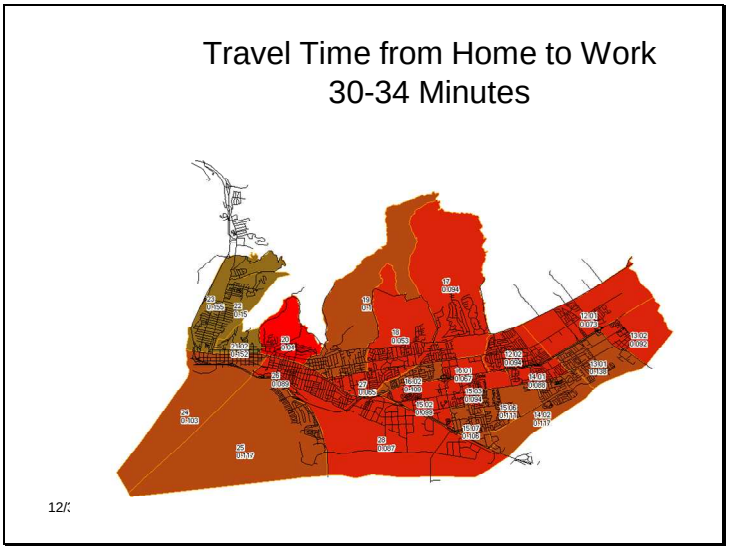

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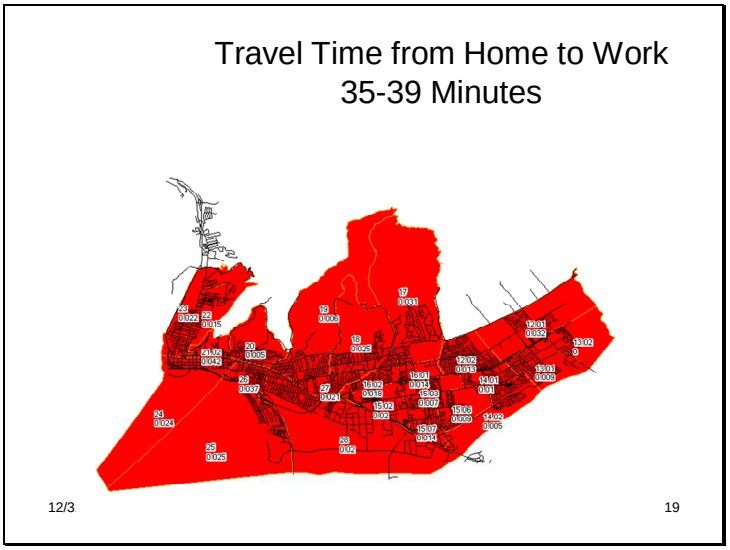

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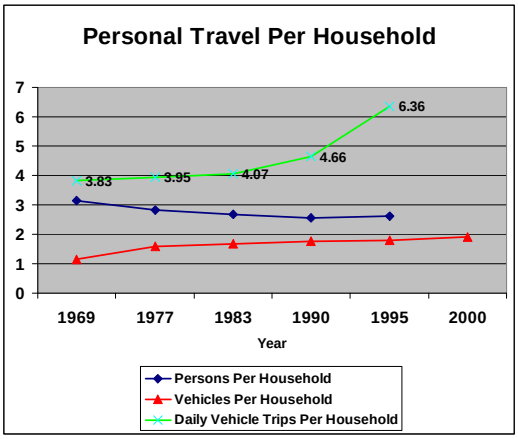

12/31/2008 Journey to Work - Part 21 20

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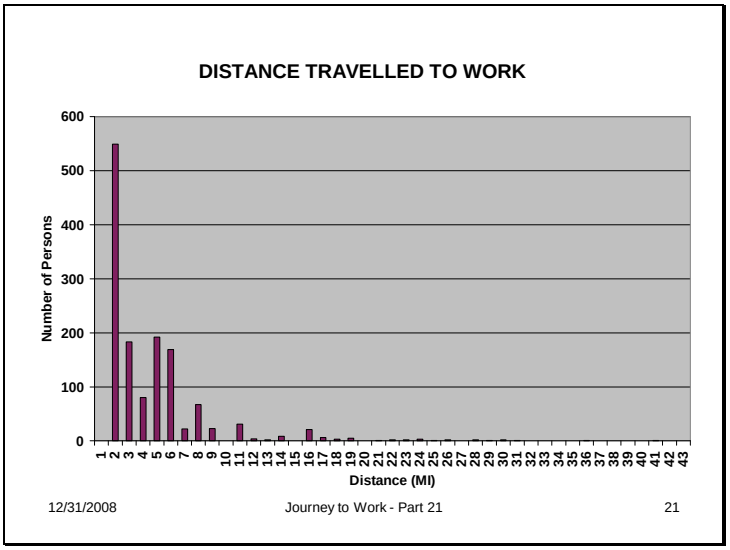
Slide 21



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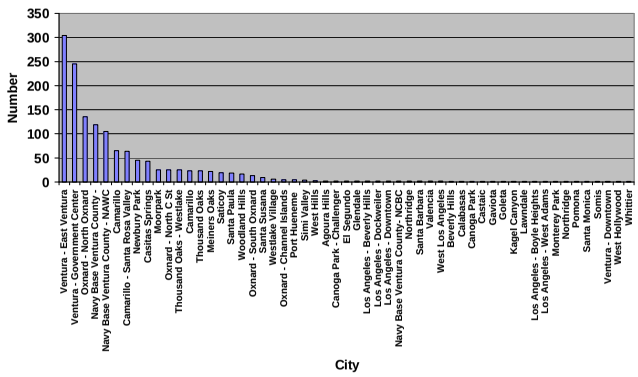
Distance Travelled To Work:

Source: Venura County Transportation Commission, 2007

Slide 22



Rideshare Data

10.88

8-411

Letter 10

COMMENTER: Daniel Cormode, East Ventura Community Council

DATE: January 4, 2009

Response 10.1

The commenter summarizes the contents of the comment letter, indicating that each of the comments contained in the summary is discussed in greater detail in subsequent chapters of the letter. The specific comments are addressed in responses 10.2 through 10.88.

Response 10.2

The commenter states an opinion that the DEIR does not adequately describe the proposed project within the context of public objectives, including environmental, economic and social factors as they relate to the goal of providing a decent home and satisfying living environment. The project objectives are discussed in DEIR Section 2.0, *Project Description*, on page 2-15. The items mentioned by the commenter (providing a decent home and satisfying living environment) may be personal objectives and would generally be part of the City's larger objectives for the community, but are not explicit objectives for the proposed project. Regardless, it is not clear based on the comment how the commenter believes the proposed project may conflict with these objectives.

Section 15126.2(a) of the *CEQA Guidelines* states that "an EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." Pursuant to *CEQA Guidelines* Section 15382, a "significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Section 15131 of the *CEQA Guidelines* specifically states that "economic or social effects of a project shall not be treated as significant effects on the environment." In accordance with this direction, the EIR properly focuses on the physical environmental effects of the proposed project, not social or economic considerations.

Response 10.3

The commenter states an opinion that the DEIR does not provide a whole record in quantifying or describing the magnitude of the effect of the proposed residential development or the environmental effects. The DEIR focuses on those issues for which potentially significant impacts were identified in the Initial Study contained in DEIR Appendix A, in comments that the City received on the draft Mitigated Negative Declaration (IS/MND), or in comments received at the EIR scoping meeting that the City held on October 28, 2008. The EIR is not required to evaluate effects that were found to be less than significant. Again, documentation

regarding effects that are less than significant is contained within the Initial Study in DEIR Appendix A (*CEQA Guidelines* §15126.2 and §15128).

Response 10.4

The commenter states an opinion that the DEIR does not base its conclusions about the significance of impacts on scientific data. This opinion is noted, though no evidence supporting this contention has been provided. In fact, the DEIR quantifies impacts for various issues, including traffic, air quality, noise, and hydrology and measures the significance of these impacts against thresholds identified in each subsection of Section 4.0, *Environmental Impact Analysis*. These thresholds provide a technical measure against which physical environmental effects are evaluated.

Response 10.5

The commenter states an opinion that the DEIR fails to recognize the effects of overcrowding of public facilities. This opinion is noted. However, a meaningful response to this non-specific comment is not possible insofar as it is not clear what "overcrowding" the comment is referencing. The DEIR analyzes impacts in a range of issue areas. These include such issues as traffic, air quality, and noise, which are largely a function of the population increase associated with the project. As discussed above, the DEIR quantifies impacts for these issues and compares these impacts to quantitative thresholds to determine their significance.

Response 10.6

The commenter states that the DEIR fails to consider economic and social impacts as they relate to the downturn in the economy. As discussed in Response 10.2, it is not the EIR's purpose to discuss social or economic impacts. Such factors will of course by considered by City decisionmakers as they review the project. However, in accordance with CEQA, the focus of EIR is on the physical environmental effects of the proposed project.

Response 10.7

The commenter states an opinion that the DEIR fails to place the "whole record" before the reviewing bodies. This opinion is noted, though no evidence supporting this contention has been provided. It should be noted that it is not the purpose of the EIR to provide the entire record for a project. The EIR is one decisionmaking tool that City decisionmakers will use to evaluate the project, but not the only one. Also, please see Response 10.2.

Response 10.8

The commenter states the information provided in his letter supports the contention that the scientific data is incomplete, that views held by the public have been withheld, and that impacts relating to a greater than the Q100 storm event, reclassification of Telegraph and Wells roads, and overcrowding of schools have not been addressed. The opinion regarding the completeness of scientific data is noted, though no evidence supporting this contention has been provided. The specific concerns about the omission of public comments are addressed in Response 10.33.

The concern about storms greater than the Q100 is noted and, of course, storms greater than the Q100 could occur as the Q100 is the storm event expected to occur once every 100 years. However, it is not the EIR's purpose to discuss every possible storm event. Like most cities in California, Ventura has adopted the Q100 as its standard with respect to flood hazards; therefore, the impact analysis appropriately focuses on this level storm event.

The reclassification of Telegraph and Wells roads was originally considered in the Draft IS/MND for the Parklands Specific Plan that was previously circulated. A memorandum from V. S. Chandrashaker, Associate Transportation Engineer for the City, addressing these reclassifications was included in Appendix E of the Draft IS/MND. The memorandum concludes that both roadways would maintain acceptable levels of service with the reclassifications. The September 2008 traffic study included in DEIR Appendix H reflects the reclassifications.

Impacts to schools are discussed in the Initial Study included in DEIR Appendix A. The discussion acknowledges and quantifies the impacts of adding students to Ventura Unified School District facilities. However, as noted in the discussion, State law specifies that payment of state-mandated school impact fees reduces such impacts to a less than significant level under CEQA. Because the applicant would be required to pay these fees, impacts would not be significant under state law.

Response 10.9

The commenter states an opinion that the 2005 General Plan EIR is incomplete and cannot be cited in other CEQA documents. This opinion is noted, though again no evidence supporting this contention has been provided. The 2005 General Plan EIR was certified by the City Council and has been determined to meet CEQA's environmental review requirements. Although that EIR does not serve as a "project-level" environmental document for individual developments in the City, citing the General Plan EIR as appropriate in project-level reviews is entirely consistent with the tiering concept described in sections 15152 and 15168 of the *CEQA Guidelines*.

Response 10.10

The commenter reiterates various concerns relating to the scope and methodologies of the DEIR analysis as well as specific concerns about hydrological, traffic, and school impacts. Please see responses 10.2 through 10.4 and 10.6 through 10.8.

Response 10.11

The commenter states that the DEIR fails to quantify the cumulative economic and social impact of overcrowded schools. Please see responses 10.2 and 10.8. Schools are discussed in the Initial Study in Appendix A. Although cumulative increases in school enrollment are not specifically quantified, cumulative projects considered in the DEIR are consistent with the growth parameters considered in the 2005 General Plan EIR. That document does consider the enrollment growth that would result from growth forecast through 2025. It should also be noted that, because all planned and pending developments in Ventura would be required to

pay state-mandated school impact fees, the impact of each project would be less than significant under CEQA.

Response 10.12

The commenter lists the "mandatory findings of significance" as outlined in Appendix G of the *CEQA Guidelines*. The purpose of providing this listing is not entirely clear. However, it should be noted that the issues listed the commenter are addressed in this listing are addressed throughout the DEIR. Each subsection of DEIR Section 4.0, *Environmental Impact Analysis*, includes a separate discussion of cumulative impacts that considers planned and pending development in the City (as discussed in Section 3.0, *Environmental Setting*). Sections 4.3, *Biological Resources*, and 4.4, *Cultural Resources*, address biological and cultural resource issues. Various sections consider impacts to human beings. These include 4.2, *Air Quality*, 4.5, *Hazards*, 4.6, *Drainage and Flood Hazards*, 4.8, *Noise*, and 4.9, *Traffic and Circulation*. Given that the project is consistent with the adopted 2005 General Plan, it is consistent with the City's long-term goals for the area.

Response 10.13

The commenter notes that the City has not formally adopted CEQA thresholds of significance and states an opinion that the thresholds used in the DEIR are based on "feelings, beliefs, and desires." It is true that the City has not formally adopted thresholds of significance for CEQA. The opinion regarding the thresholds used in the DEIR is noted, though no evidence to support this contention has been provided. In fact, the DEIR uses quantitative thresholds for many issue areas, including traffic, air quality, noise, and drainage/flooding. Some of these thresholds (traffic, noise, and drainage, for example) are based on adopted City standards. Others (air quality, for example) are those recommended by other regulatory agencies (in the case of air quality, the thresholds used are those of the Ventura County Air Pollution Control District). Other thresholds used in the DEIR (biological resource thresholds, for example) are derived from Appendix G of the *CEQA Guidelines* and the City's adopted environmental checklist (see DEIR Appendix A).

Response 10.14

The commenter reiterates an opinion that the 2005 General Plan EIR is incomplete and cannot be cited. Please see Response 10.9.

Response 10.15

The commenter states that economic and social impacts to agriculture are not discussed. Please see Response 10.2. Agricultural resources are discussed in Item B of the Initial Study in DEIR Appendix A. The plan area is surrounded on all sides by suburban development. Consequently, buildout of the project would not be expected to adversely affect existing agricultural operations.

Response 10.16

The commenter states that the economic or social impact on historic structures has not been discussed. Please see Response 10.2. No historic resources have been identified within or adjacent to the plan area; therefore, the proposed project would not have the potential to result in significant physical effects upon historic resources.

Response 10.17

The commenter reiterates a concern that flood events larger than the Q100 have not been addressed. Please see Response 10.8.

Response 10.18

The commenter states that economic and social impacts to fire protection have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. Impacts to fire protection service are discussed in Item L of the Initial Study contained in DEIR Appendix A. No significant impacts to fire protection service were identified; therefore, further discussion of that issue in the DEIR was determined to be unwarranted. The statement from the 2005 General Plan EIR regarding high fire hazards does not apply to the current project because the plan area is not within a designated high fire hazard zone.

Response 10.19

The commenter again states that economic and social impacts to fire protection have not been addressed and cites another statement from the 2005 General Plan EIR. Please see responses 10.2 and 10.18. It is true that the 2005 General Plan EIR identifies a need for new firefighters to serve the Ventura Harbor and Ventura Avenue areas. However, the proposed project is not within either of these areas. Moreover, it should be recognized that the need for additional firefighters would constitute a significant impact under CEQA only if the provision of additional firefighters would have the potential for significant physical effects.

Response 10.20

The commenter states that economic and social impacts to police protection have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. Impacts to police protection service are discussed in Item L of the Initial Study contained in DEIR Appendix A. No significant impacts to police protection service were identified; therefore, further discussion of that issue in the DEIR was determined to be unwarranted. It is true that the 2005 General Plan EIR identifies a need for new police officers by 2025 in order maintain officers to population ratios. However, as noted above, it should be recognized that the need for additional police officers would constitute a significant impact under CEQA only if the provision of additional firefighters would have the potential for significant physical effects.

Response 10.21

The commenter reiterates concerns about social and economic impacts to schools. Please see Response 10.8.

Response 10.22

The commenter states that economic and social impacts to libraries have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. As the commenter notes, the General Plan EIR indicates that the provision of needed library services could be accomplished without significant environmental effects.

Response 10.23

The commenter states that economic and social impacts relating to solid waste generation have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. The 2005 General Plan EIR identified an unavoidably significant impact relating to citywide solid waste generation. Item M of the Initial Study in DEIR Appendix A addresses the project's solid waste impacts and concludes that such impacts would be less than significant. Cumulative solid waste impacts are discussed in Item P of the Initial Study and concludes that such impacts would be significant, consistent with the determination in the 2005 General Plan EIR.

Response 10.24

The commenter states that economic and social impacts relating to parks have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. Item L of the Initial Study in DEIR Appendix A addresses the project's impacts relating to parks and concludes that such impacts would be less than significant.

Response 10.25

The commenter states that economic and social impacts relating to roadways have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. Traffic impacts are addressed in DEIR Section 4.9, *Traffic and Circulation*. The project applicant would be required to contribute to implementation of the needed improvement at Wells Road/Darling Road, thus reducing the project's impact at that location to a less than significant level, similar to what was conclude in the 2005 General Plan EIR.

Response 10.26

The commenter states that economic and social impacts relating to alternative transportation modes have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. As the commenter acknowledges, the 2005 General Plan EIR concludes that such impacts would be beneficial. Similarly, the proposed project would not adversely affect alternative transportation modes. To the contrary, it would provide pedestrian and bicycle facilities and could be served by public transit.

Response 10.27

The commenter states that economic and social impacts relating to providing transportation improvements have not been addressed and cites a statement from the 2005 General Plan EIR. Please see responses 10.2 and 10.24.

Response 10.28

The commenter states that economic and social impacts relating to providing water have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. The commenter correctly notes that growth accommodated under the 2005 General Plan would increase citywide water demand. However, the commenter fails to note that the 2005 General Plan EIR concluded that water supply impacts would be less than significant since the City's available supplies are sufficient to meet projected demands. The water supply assessment conducted for the proposed project (see DEIR Appendix I) reached a similar conclusion.

Response 10.29

The commenter states that economic and social impacts relating to providing wastewater service have not been addressed and cites a statement from the 2005 General Plan EIR. Please see Response 10.2. As the commenter acknowledges, the 2005 General Plan EIR concluded that the existing and planned wastewater system could meet the demands associated with growth under the 2005 General Plan and that impacts would be less than significant. Similarly, Item M of the Initial Study in DEIR Appendix A concludes that the proposed project's impact to the wastewater system would be less than significant.

Response 10.30

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.31

The commenter states an opinion that the DEIR does not identify the magnitude of cumulative impacts and lists CEQA's requirements for cumulative impact analysis.

CEQA Guidelines Section 15130(a) states that an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the EIR need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Subsection (1) further defines a cumulative impact as "an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

Examination of cumulative effects was performed for all of the issues identified in the Initial Study Checklist. Cumulative impacts related to solid waste were determined to be Class I unavoidably significant under the General Plan and a statement of overriding considerations

was adopted as discussed under item P.3. of the Initial Study. Impacts related to noise were also found to be cumulatively significant though the project contribution is not cumulatively considerable. However, with installation of a sound wall along the south side of Blackburn Road as discussed on page 4.8-14 and 4.8-15 of the DEIR, the impact would be less than significant.

Within the DEIR, cumulative impacts are examined at the end of each issue area based on about 8,000 dwelling units and five million square feet of commercial development in accordance with planned buildout under the 2005 General Plan as discussed in Section 3.0, *Environmental Setting*. The cumulative analysis was undertaken in accordance applicable portions of the *CEQA Guidelines* as discussed above.

It is not the EIR's purpose to demonstrate the City's ability to meet the requirements of AB 32 and SB 375. That said, greenhouse gases and impacts to global climate change, including the requirements of AB 32, are discussed in Section 4.2, *Air Quality*. With respect to SB 375, the proposed project involves infill development that would help implement many of the City's objectives with respect to New Urbanism by providing a mix of uses, a range of housing types, walking and bicycling facilities, and parks/open space. In this way, it would be expected to generally meet the intent of SB 375.

Response 10.32

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.33

The commenter states that the DEIR does not address all of the comments submitted in response to the previously prepared Initial Study/Mitigated Negative Declaration (IS/MND), the Notice of Preparation (NOP), and the EIR scoping meeting. The commenter also states that the City has failed to respond to requests for public information.

The comment regarding requests for public information is not relevant to the EIR. With respect to the comment about the previously prepared IS/MND and the EIR scoping materials, the DEIR was prepared specifically in response to the various comments the City received on the Draft IS/MND. The DEIR, including the Initial Study contained in Appendix A, addresses many of the comments raised by the commenter. However, in other instances, it was determined that the comments are not relevant to the EIR or that the Initial Study adequately addressed the issues. For example, the commenter provided similar comments regarding schools on the IS/MND and in response to the NOP. However, as discussed in the Initial Study and in these responses, the information requested by the commenter is not relevant to the EIR insofar as state law dictates that payment of state-mandated school impact fees reduces impacts to a less than significant level. Therefore, the information requested by the applicant does not relate to any significant impact under CEQA.

Response 10.34

The commenter provides additional specificity with respect to comments that were made at the EIR scoping meeting. The intent of Table 1-2 in Section 1.0, *Introduction*, is to summarize the

comments received at the scoping meeting and to indicate whether and how those comments are addressed in the DEIR. It is true that the commenter provided much more detailed comments at the scoping meeting; however, as discussed in Response 10.33, many of the comments are either addressed or are simply not relevant to the EIR. For example, the commenter's statement implying that density should be calculated as "dwelling units per acre" is not relevant because: (1) it does not relate to an environmental issue; and (2) regardless of how the commenter believes density should be calculated, the methodology suggested is not the way the City calculates density.

Appendix A includes comments that were received during the 30-day public review period for the MND, in addition to responses on the NOP; however, in response to this comment, the EIR scoping meeting comments will also be added to Appendix A of the FEIR.

Response 10.35

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.36

The commenter provides population and housing data, suggesting that planned and pending development would account for a substantial proportion of planned growth through 2025. Population and housing impacts are discussed in Item K of the Initial Study in Appendix A. Because the population and housing growth associated with the proposed project are within growth forecasts, impacts were found to be less than significant. As acknowledged by the commenter, potential growth associated with planned and pending development would remain within 2005 General Plan forecasts. It should be recognized that currently planned and pending developments in the City will be built over a period of many years. It should also be noted that the population growth for the Wells-Saticoy community discussed by the commenter is consistent with the forecasts contained in the 2005 General Plan.

Response 10.37

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.38

The commenter provides numerous comments regarding school capacity, costs of providing schools, a school siting study prepared by the Ventura Unified School District (VUSD), and school siting criteria from the Department of Education. As discussed in Response 10.8, impacts to schools are discussed in the Initial Study included in DEIR Appendix A. The discussion acknowledges and quantifies the impacts of adding students to Ventura Unified School District facilities. However, the proposed project does not involve siting of a school. Moreover, as noted in the discussion, State law specifies that payment of state-mandated school impact fees reduces such impacts to a less than significant level under CEQA. Because the applicant would be required to pay these fees, impacts would not be significant under state law. Because the information provided by the commenter does not relate to a potentially significant impact of the currently proposed project under CEQA, it is not relevant to the EIR.

Response 10.39

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.40

The commenter states an opinion that the water supply analysis does not comply with CEQA or Supreme Court principles, does not discuss alternative water sources or the potential effects of drought, and does not provide confidence that available supplies will meet project demands. These opinions are noted. However, contrary to what the commenter suggests, the water supply analysis contained in Item M of the Initial Study in DEIR Appendix A is based upon a Water Supply Assessment (WSA) performed pursuant to the requirements of SB 610. The WSA, which is included in its entirety in DEIR Appendix I, considers both normal weather years as well as single and multiple year drought conditions. As noted in the WSA, the proposed project is accounted for in the City's 2005 Urban Water Management Plan (UWMP), which concludes that the available water supplies are sufficient to meet the City's demand over a 20-year horizon under any of the weather scenarios considered. As such, project impacts were determined not to be significant under CEQA.

The commenter has not provided substantiation for the data provided regarding water use. Absent such substantiation of the alleged flaws, the data from the formally adopted UWMP is deemed reliable. Moreover, the data regarding water costs is not relevant to the EIR. As discussed in Response 10.2, it is not the EIR's purpose to identify economic effects.

Response 10.41

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.42

The commenter reiterates a previous comment. Please see Response 10.8.

Response 10.43

The commenter states that the DEIR does not address costs to the City to delay roadway improvements to a later date. The basis for the contention about costs to the City is not clear. Regardless, as discussed in Response 10.2, economic impacts are not the focus of the EIR.

Response 10.44

The commenter states that the DEIR does not address impacts related to intensification of land use as compared to 2005 General Plan densities. The proposed project is actually consistent with the 2005 General Plan, which allows density of up to 8 units per acre. The 499 units proposed for the 66.7-acre area amount to about 7.5 units per acre.

Response 10.45

The commenter reiterates a previous comment. Please see Response 10.8.

Response 10.46

The commenter suggests that the EIR does not address cumulative impacts to Wells Road traffic. Contrary to what the commenter suggests, the traffic analysis in DEIR Section 4.9, *Traffic and Circulation*, considers forecast development through 2025, per the 2005 General Plan. As such, cumulative traffic growth has been considered.

Response 10.47

The commenter states an opinion that the EIR errs in using "urban trip generation rates" in a suburban environment. The trip generation rates used in the DEIR traffic analysis are from the Institute of Transportation Engineers (ITE), a nationally recognized resource of trip generation estimates. Contrary to what the commenter suggests, the rates used are not "urban" rates; rather, they represent the average rates as reported by ITE. "Urban" rates, where use of alternative transportation modes may generally be more common, would typically be lower than those used in the DEIR.

Response 10.48

The commenter states an opinion that the DEIR does not address the physical, economic, or social effects of increased traffic or required infrastructure improvements. This opinion is noted, though it is not clear what physical effects the commenter believes have not been addressed. As noted in Response 10.2, it is not the EIR's purpose to address economic or social effects.

Response 10.49

The commenter reiterates a previous comment. Please see Response 10.31.

Response 10.50

The commenter provides various data regarding traffic patterns and travel behavior and reiterates previous comments. The relevance of most of the data provided to the EIR is not clear; therefore, a meaningful response is not possible. Please see responses 10.8 and 10.46 for discussion of the proposed reclassification of Telegraph and Wells roads and cumulative impacts. With respect to the commenter's assertions about traffic that would be generated once the SOAR Ordinance expires, the traffic estimates provided by the commenter are all predicated on the notion that all properties currently under the SOAR Ordinance would be developed following SOAR's expiration. This is speculative as no proposals for development of SOAR properties have been submitted to date. CEQA discourages EIRs from engaging in idle speculation about possible future events.

Response 10.51

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.52

The commenter states an opinion that the analysis of the visual impacts from Telegraph Road, Blackburn Road, and Wells Road is incomplete, indicating that the DEIR does not describe the impact of "high rise" buildings or proposed sound walls. The commenter also states an opinion that the DEIR does not address cumulative impacts associated with proposed sound walls along SR 126.

The impact of the project, including proposed sound walls, upon views from scenic routes identified in Policy 4D of the 2005 General Plan (SR 126, Telegraph Road, Wells Road) is discussed in Section 4.1, *Aesthetics*, beginning on page 4.1-6. The discussion acknowledges the alteration of views of the plan area as well as the fact that the proposed sound wall along the north side of SR 126 would intermittently block views of the mountains to the north for SR 126 travelers. The change in visual character would be the same as the impact that was previously acknowledged in the 2005 General Plan EIR, for which the City has already adopted a Statement of Overriding Considerations. The creation of a potentially monolithic structure along the freeway is identified as a significant impact that can be mitigated through the use of texturing and landscaping that softens the effect of the wall.

The other possible view locations mentioned by the commenter (Blackburn Road, Saticoy Avenue, Brown Barranca) are not identified in any adopted City document as important view locations. Thus, although it is true that project implementation would alter views from these locations, the identified significance threshold used applies to scenic routes and other identified view locations.

Cumulative impacts associated with proposed sound walls along SR 126 are discussed under subsection 4.1.2.c of Section 4.1, *Aesthetics*, beginning on page 4.1-9. The discussion acknowledges the cumulative impact associated with the proposed sound wall in combination with the sound wall to be built as part of the Hansen Trust project to the east. These sound walls would change the visual character along the freeway; however, as with the proposed sound wall, the impact of the Hansen Trust project sound wall is to be mitigated through landscaping and wall design. In addition, it should again be noted that the 2005 General Plan EIR acknowledged the impact associated with conversion of these areas and associated sound wall construction. The City has already adopted a Statement of Overriding Considerations for that cumulative impact.

The opinion regarding the compatibility of proposed housing types with surrounding uses is noted. It is true that certain components of plan area development would exceed the height of and massing of existing development in the area. However, the proposed density of development (7.5 units per acre) is consistent with the allowable density in the 2005 General Plan. Moreover, although there is no single definition of "high rise" development, City staff does not agree with this characterization of plan area development as the maximum height of single family residences adjacent to existing single family residences is two stories and the maximum height for courtyard residences near the Telegraph Road/Wells Road intersection is four stories.

In response to this comment, the discussion of impacts to Telegraph Road on page 4.1-8 has been revised to read as follows:

> *Telegraph Road. With respect to Telegraph Road, the proposed development would occur south of Telegraph Road, whereas the closest hillsides lie to the north. The distant hillsides to the south and east would be partially obscured by plan area development; however, the hillsides to the southeast are more than two miles away and, therefore, are not prominent visual features from Telegraph Road. Thus, although the proposed development would alter the character of views to the south by converting agricultural land to residential use, it would not obstruct views of the hillsides to the north. Consequently, the visual effect of plan area development along the Telegraph Road corridor would be less than significant.*

Response 10.53

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.54

The commenter describes various project features that he believes will inhibit emergency response, states that increased emergency response times and parkway swale hazards are not addressed in the DEIR, and states an opinion that modifications to the California Fire Code requirements have not been justified. It is not the EIR's purpose to justify the applicant's proposal or to perform an analysis of whether the project design meets Fire Department requirements. The Fire Department separately reviews all projects to ensure that designs will allow for adequate emergency access. The purpose of the EIR is to analyze the possible environmental impacts associated with providing fire protection service (i.e., the purpose is not to analyze impacts to fire protection service, but rather to analyze the impacts of providing fire protection service – see the environmental checklist in *CEQA Guidelines* Appendix G). The most common way that fire protection service may create significant environmental impacts is if a project site were outside the service boundaries and a new station that may itself create significant environmental effects would need to be built to serve the project. However, as discussed in Item L of the Initial Study in DEIR Appendix A, the project site is within the current service area of the Ventura Fire Department; therefore, fire protection service can be provided without creating environmental impacts and impacts were determined to be less than significant under CEQA. For this reason, it was determined that further analysis of fire protection service impacts in the DEIR was not warranted. The Fire Department will review and approve all plans for fire safety issues prior to issuance of building permits.

Response 10.55

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.56

The commenter states an opinion that the archaeological/cultural research was limited and incomplete, noting the presence of known cultural resources within one mile of the site. It is true that cultural resources have been discovered and a Chumash Memorial is planned on a site within a mile of the site. However, the proposed project would not affect either the resources or the memorial, which are on the opposite side of SR 126. A Phase I archaeological resources

survey that was conducted in conjunction with the DEIR (see Appendix D) revealed no resources on or in the immediate vicinity of the plan area.

Response 10.57

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.58

The commenter reiterates a previous comment. Please see Responses 10.8.

Response 10.59

The commenter states various concerns about drainage and flooding, questioning data used in the analysis, indicating that the latest FEMA flood maps have not be referenced and the upgrades to infrastructure other than Brown Barranca have not been addressed, and alleging that no studies or data validating the project impacts have been provided.

As discussed in DEIR Section 4.6, *Drainage and Flood Hazards*, the proposed project includes an on-site detention system that is designed to hold some runoff within the plan area such that peak post-development discharges would not exceed peak pre-development discharges. The basin would be designed to mitigate increased runoff from the entire site (all 67 acres) and would capture all flows greater than a Q10 by implementing metered discharge at pre-development flow rates. The discussion notes that the existing double box culvert at Blackburn Road is deficient during a 100-year storm event, but the project includes a triple box culvert to address this deficiency. As discussed in Section 4.6, this would increase the velocity within the concrete channel south of Blackburn Road and north of Henderson Road by 0.18 feet per second to 1.44 feet per second (see Table 4.6-3). The velocity increases would occur within the concrete channel and would be slowed by downstream capacity deficiencies, which cause flooding at SR 126 (see Table 2 and Table 6 of the Brown Barranca Hydraulic Study (Henderson Road to Telegraph Road), Omrun Engineering, December 2006 – see Appendix E). The velocity increase to 1.44 feet/second slows to no net increase in velocity prior to discharge into the natural bottom channel south of Henderson Road. Therefore, the proposed project would not have the potential to cause erosion or sedimentation downstream due to increased velocities and erosion/sedimentation impacts would be less than significant.

The infrastructure upgrades needed to address drainage and flooding issues created by the implementation of the Parklands Specific Plan, including those described above, are proposed as part of the project. Though cost issues are not relevant to the EIR, it should be noted that the project applicant would fund improvements needed to facilitate the proposed project. The applicant is not, however, responsible for corrected other infrastructure deficiencies unless such deficiencies are in part of a result of, or needed to accommodate, the proposed project.

The flood zones discussed in Section 4.6 and depicted on Figure 4.6-1 are the current and proposed future zones following planned improvements to Brown Barranca. While it is true that the various map revisions mentioned by the commenter are not specifically discussed, these changes were made 10 or more years ago and are reflected in the current data and mapping.

Contrary to what the commenter suggests, several drainage/hydrology studies were prepared in conjunction with the DEIR. These are listed on page 4.6-1 of Section 4.6. These studies, prepared by Hawks & Associates and Omrun Engineering, have been reviewed for accuracy by City of Ventura Engineering staff.

Response 10.60

The commenter notes that the project would reduce the existing draw on groundwater in the plan area, that the increase in impermeable surfaces would alter groundwater recharge, and that the increase in groundwater use is not quantified in the DEIR.

It is true that the addition of impermeable surfaces within the plan area may incrementally reduce recharge potential as compared to current conditions. However, any such reduction would be more than offset by the reduction in groundwater draw associated with removal of the plan area from agricultural production.

As discussed in the water supply assessment in DEIR Appendix I, the proposed project would generate demand for an estimated 234 acre-feet of water per year. The proposed project was accounted for in the City's 2005 Urban Water Management Plan, which concluded that the City's water supplies are sufficient over a 20-year horizon. Thus, impacts to water supplies (including groundwater) would not be significant.

Response 10.61

The commenter suggests that statements in the DEIR regarding agricultural and urban pollutants in groundwater are in conflict. By removing the plan area from agricultural production, the proposed project would reduce the potential for pesticide, herbicide, and fertilizer contamination. On the other hand, the introduction of suburban uses would increase the potential for urban pollutants such as petroleum hydrocarbons and heavy metals. These statements are not in conflict. It is true that pollutant concentrations are not quantified; however, all plan area development would be required to comply with the requirements of the Ventura County SQUIMP. As discussed in the Initial Study in DEIR Appendix A, the SQUIMP sets specific water quality standards that all development within the County must meet. Adherence to these standards would reduce impacts to a less than significant level.

Responses 10.62 through 10.70 have been prepared with the assistance of HAWKS & Associates Civil Engineers.

Response 10.62

The commenter suggests that Brown Barranca downstream of Telegraph Road cannot be used as a park because access is limited and use may adversely affect wildlife. Access into the Barranca will be restricted. However, City Parks and Planning staff have agreed that the open spaces is a visual amenity which is considered parkland.

Response 10.63

The commenter suggest that overflow from Brown Barranca was not considered by the 1996 Ventura County Flood Control District determination of flooding in the Citrus Place area east of Wells Road. Regardless of the previous studies, the December 2006 Brown Barranca Hydraulic Study by Omrun Engineering was based on the current hydrology and topographic mapping for Brown Barranca determined that there is no Q100 flood overflow of Wells Road to the east in the Citrus Place area. The possible deficiency in Franklin Barranca and impact on Citrus Place would not be affected by the proposed Parklands development.

Response 10.64

The commenter asked why the future condition Q100 peak flows used in the current Brown Barranca Hydraulic Study are different than the Q100 flows used for the FEMA Effective FIS Analysis completed in 1985 and 1986. The FEMA FIS flows were based on the present condition in the watershed and available hydrologic and topographic data at that time. The 2006 Study is based on updated, more detailed hydrologic, topographic and land area data including the November 2004 future condition hydrology by VCWPD. FEMA requires that the best available information be used for current flood plain analysis.

Response 10.65

The commenter suggests that the flow data in Appendix C of the Omrun Brown Barranca Hydraulic Study is flawed because the difference in Q100 flow between Hwy. 126 and Telegraph Road of 241 cfs does not include flow from all contributing areas. Flows from all areas are included but because of difference in timing of flow routing within the hydrologic model, the peak flows are not directly added.

Response 10.66

The commenter suggests that the Detention Design Report does not include an adequate map of the study area, drainage from the property east of Brown Barranca and from Linden Drive, and pollutant discharge is not controlled. Also, comment is made about deficiencies in the VCWPD Brown Barranca Pre-Design Report of Dec. 2005. The response is:

- A VCRAT Hydrology Map is included in the final report that shows a color aerial photo on which is plotted the hydrologic subareas in the original VCWPD model and the subareas modified for the detention design. Complete results of the modified VCWPD model are also included in the report (Technical Appendix A7 of the *Parklands Development TTM No. 5632 Detention Design*; Hawks & Associates; Second Revision October 2008)
- The detention design concept is to provide sufficient detention basin volume west of Brown Barranca to provide for total area of development: Linden Drive is not included in the Parklands area but storm flow from Linden Drive will be intercepted and conveyed by a storm drain to bypass the detention and discharge into Brown Barranca.
- Hydrology map flows utilized in the Report are limited to those that pertain to Parklands including the Linden Drive area. A detailed hydrology map for the entire Brown Barranca watershed may be obtained from VCWPD.

- The VCWPD 2005 Brown Barranca Report that included study of potential improvements from the Santa Clara River to Blackburn Road was used as a reference for the 2006 Omrun Report. The more detailed 2006 study focused on interim and future improvements between Henderson Road and Telegraph Road related to Parklands.
- Stormwater pollution control measures include grass swales, pervious pavement and a low flow extended detention basin for the 54 acres west of Brown Barranca. Low flow from the 13 acres east of the Barranca will be conveyed in the grass swale over the underground box conduit for Brown Barranca.

Response 10.67

The commenter stated that a list of ten previous reports and studies conducted in the area between 1995 and 1999 were not referenced in the current Parklands Report. They were not directly referenced in the current report because information was considered outdated and not applicable to the current Parklands development.

Response 10.68

The commenter suggests that the floodplain analysis is in error because his field verification revealed that the LiDAR updated topographic map of Brown Barranca is not consistent with photographs taken upstream and downstream of Telegraph Road. The 2006 LiDAR topography used for the Omrun Study was the best available mapping information. Any field verified minor discrepancies will not have a significant effect on the results of the study.

Response 10.69

The commenter refers to the results of a Floodplain Investigation for Brown Barranca dated August 1995 that shows a Q100 flood within 6" of overtopping Wells Road. The 2006 Omrun study also shows no overflow of Wells Road and is based on current data. Therefore, it appears that the 1995 floodplain analysis for Citrus Place was correct.

Response 10.70

The commenter appears to be concerned about the potential for flooding of existing Citrus Place area east of Wells Road if overflow occurs from Brown or Franklin Barranca. The 2006 Omrun Report shows for a Q100 that Brown Barranca will not overflow east of Wells Road north of the 126 Freeway and affect the Saticoy Drain capacity. The potential for Franklin Barranca overflow is not affected by the Parklands development.

Response 10.71

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.72

The commenter states concerns about asbestos hazards, suggesting that the evaluation of asbestos issues is incomplete. The analysis of hazard-related impacts, discussed in DEIR Section 4.5, Hazards and Hazardous Materials, is based upon the findings of Phase I and II

Environmental Site Assessments (ESAs) prepared by Earth Systems Southern California (November 2005) and Earthsystems Southwest (November 2006). The Phase I ESA investigates the potential for recognized environmental conditions that warrant further investigation. The Phase I ESA included a limited site reconnaissance, regulatory agency database review, site use history research, and preparation of the report. The Phase II ESA included exploration of the recognized environmental conditions that were identified in the Phase I ESA. The Phase II ESA included 99 soil samples for laboratory analysis, eight borings, and a geophysical survey with subsequent analysis and preparation of a report. Contrary to what the commenter suggests, these studies thoroughly examine potential hazards, including asbestos-related hazards, in accordance with industry standards. Though the potential for additional asbestos-containing pipes cannot be ruled out, Mitigation Measure HAZ-2 in Section 4.5 would address any potential health or safety issues relating to asbestos.

Response 10.73

The commenter notes that the DEIR does not discuss liquefaction. Liquefaction is addressed in the Initial Study in DEIR Appendix A, under Item G. The potential for liquefaction hazards was determined to be less than significant with implementation of standard conditions. Therefore, analysis of that issue in the DEIR was determined not to be warranted.

Response 10.74

The commenter notes that the different soil types within the plan area are not addressed in the DEIR. Soil types would be discussed only insofar as they relate to significant environmental impacts. As discussed in Item G of the Initial Study in DEIR Appendix A, no significant soil-related impacts were identified for the proposed project.

Response 10.75

The commenter states an opinion that the actual stream bank slope is inconsistent with the slope shown on topographic maps. It is not clear based on the comment what the commenter believes is incorrect. On page 4.3-1 of Section 4.3, Biological Resources, the DEIR describes Brown Barranca as follows:

> *Within the plan area, the barranca supports native riparian vegetation, though about 290 linear feet of this reach has been fortified on the north bank with concreted rock rip-rap where the Barranca then drains into a concrete box culvert beneath Blackburn Road. Downstream of the plan area, Brown Barranca is channelized into a concrete trapezoidal channel.*

Response 10.76

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.77

The commenter provides various data regarding parking and states disagreement with what he believes are the specific plan's parking requirements. The concern about parking is noted.

However, the commenter's understanding of the proposed parking supply for the plan area is incorrect. As shown in Table 2-4 in DEIR Section 2.0, Project Description, the total parking supply for the plan area, including on-site and on-street spaces, is 2,132 spaces, 2,066 of which would serve plan area residences. This comes to more than four spaces per residential unit, which is expected to more than meet the demand for parking within the plan area. As such, spillover parking into adjacent neighborhoods is not anticipated.

Response 10.78

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.79

The commenter reiterates a previous comment. Please see Response 10.2.

Response 10.80

The commenter reiterates a previous comment. Please see Response 10.31.

Response 10.81

The commenter states various concerns about potential bus service to the plan area. These comments are not relevant to the DEIR as they do not pertain to any significant environmental impacts. Nevertheless, it should be noted that the plan area would have access to bus service along major thoroughfares located adjacent to the plan area boundaries, including Wells Road and Telegraph Road.

Response 10.82

The commenter reiterates previous comments and indicates that rail service is not a viable alternative for most employees. Please see responses 10.2 through 10.4, 10.7, and 10.31. The comment about rail service is not relevant to the DEIR as it does not relate to a significant environmental effect. It is true, however, that rail transportation likely would not be a viable alternative for most area employees.

Response 10.83

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.84

The commenter states an opinion that the proposed specific plan would not meet "New Urbanist" goals related to providing quality housing and walkability. The commenter also states that greenhouse gas emission reduction goals are not addressed. The opinions regarding New Urbanism and walkability are noted, but are not relevant to the DEIR as conformance with New Urbanist goals is not a criterion used to determine the significance of environmental impacts under CEQA. That said, it should be noted that it is the opinion of City staff that the proposed project meets many New Urbanist goals by providing a mix of uses, a range of

housing types, parks and open space, and access to a variety of transportation modes, including walking, bicycling, and transit. The comment regarding greenhouse gases is incorrect. Greenhouse gases and global climate change are discussed in DEIR Section 4.2, *Air Quality*, beginning on page 4.2-14.

Response 10.85

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.86

The commenter provides various data relating to employment and suggests that placing new housing in an area of the City that is already "housing rich" would increase energy consumption and limit housing choices. The data provided do no relate to any significant environmental effect under CEQA. Nevertheless, it should be noted that the City facilitates a variety of housing types in a range of settings throughout the community, ranging from low/medium density single family housing in portions of East Ventura to high density multi-family housing in downtown Ventura. The proposed specific plan would facilitate a range of housing types and densities as well as a limited amount of retail development. Although it is true that employment opportunities in East Ventura are limited, the distance to employment centers along Victoria Avenue and in the Arundell and Downtown communities is only about 4-8 miles. For this reason and because shopping opportunities are to be provided in and near the plan area, contrary to what the commenter suggests, transportation-related energy consumption would not be excessive.

Response 10.87

The commenter reiterates previous comments. Please see responses 10.2 through 10.4 and 10.7.

Response 10.88

The commenter provides additional data regarding the "journey to work." The data provided do not relate to any significant impact under CEQA and the relevance of the data to the DEIR is not clear. As the commenter suggests, it is likely true that commute distances for residents of the Saticoy-Wells area may be somewhat longer than for residents of the Victoria Avenue and Midtown/Downtown areas. However, as discussed in Response 10.86, the City facilitates a variety of housing types throughout the community and the travel distances from the plan area to employment centers, though longer than for residents of some other parts of Ventura, are still only in the 4-8 mile range.

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