



**NOTICE OF INTENT TO CONSIDER AN AMENDMENT
TO THE CITY OF VENTURA'S LOCAL COASTAL PROGRAM**

Consistent with California Coastal Commission noticing requirements, notice is hereby given that the Planning Commission of the City of San Buenaventura will consider an Amendment to the City's Local Coastal Program (LCP) through: Land Use Plan amendment comprising of Land Use change from Planned Commercial-Tourist Oriented (PC-T) to Planned Mixed Use (PMXD) and Zone Change from Commercial Tourist Oriented (CTO) to Coastal Mixed Use (CMXD) for property in the Pierpont Community. The Planning Commission hearing is scheduled for September 20, 2011, 6:00 P.M., at City Hall, 501 Poli Street, Ventura, CA.

A copy of the draft LCP amendment is available at City Hall, Room 117, 501 Poli Street, Ventura, CA. An electronic copy of the documents can be obtained by contacting Elizabeth Richardson, Assistant Planner, at erichardson@cityofventura.net. You may also contact Ms. Richardson by phone at 805-658-4722 if you have any questions.



Planning Division
501 Poli Street
Ventura, CA 93001
805.654-7893
Fax 805.654-7560

**NOTICE OF INTENT TO ADOPT NEGATIVE DECLARATION
CITY OF SAN BUENAVENTURA, CALIFORNIA**

- I. The City of Ventura has reviewed an application for the following proposed project:
 - A. **Project Description for Case #5446:** Comprehensive Plan Amendment (CPA) and Zone Change to change the Land Use from Planned Commercial Tourist Oriented (PC-T) to Planned Mixed Use (PMXD) and change the zone from Commercial Tourist Oriented (CTO) to Coastal Mixed Use (CMXD) to facilitate the development of a new 30 unit residential development on the site currently occupied by a four-story parking structure. The site is currently developed with a 285-room hotel and parking structure which were originally constructed together in 1986. The parking structure was intended to not only provide parking for the hotel but also as additional visitor serving parking for those using the beaches in the area. Filed by Integrated Capital-Ventura Beach LLC, 11100 Santa Monica Blvd #360, Los Angeles, CA 90025, (310) 575-8801.
 - B. **Proposed finding.** In accordance with Section 15070 of the California Code of Regulations, the Planning Division of the City of Ventura has determined that there is no substantial evidence that the proposed project would have a significant effect on the environment, and that a negative declaration (ND) may be adopted.
 - C. **Fish and Wildlife Impacts:** On the basis of the information contained in the Initial Study, and on the record as a whole, there is no evidence that there will be an adverse effect on fish or wildlife habitats or resources since none of the factors listed in Section 2R.450.530 of the Municipal Code are present.
 - D. **Hazards:** The project site is not on any of the lists enumerated under Government Code Section 65962.5 including, but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites.
 - E. **Document Review and Comment.** The public review and comment period of the draft begins on August 5, 2011 and ends on August 25, 2011. To view the draft document, please visit the city's website at <http://www.cityofventura.net/cd/planning/devreview>. Alternatively, the draft and referenced documents are available for review between 8:00 a.m. to 5:00 p.m., Monday through Friday (closed on August 12) at the Planning Counter, City Hall, 501 Poli Street, Ventura CA 93001.

F. Public Hearing and Comments. A public hearing on the project described above is tentatively scheduled on September 20, 2011 at 6:00 pm in the City Council Chambers at City Hall located at 501 Poli Street, Ventura, CA 93001. Separate public noticing will be provided prior to the public hearing. All comments concerning the draft ND should be provided in writing and received before 5:00 p.m. on the last day of the review period. Inquiries should be directed to Elizabeth Richardson, Assistant Planner, at (805)658-4722. Written comments may be mailed or faxed (805/ 653-0763) to the City of Ventura, Planning Division, 501 Poli Street, CA 93001.

8/11/11
Date _____


Elizabeth Richardson, Assistant Planner

cc: Applicant and property owner, County Clerk, and ND Distribution List.



CITY OF SAN BUENAVENTURA INITIAL STUDY

I. BACKGROUND:

- A. Case No.:** EIR-3-11-5446
- B. Lead Agency Name/Address:** City of San Buenaventura
PO Box 99
Ventura, CA 93002
- Staff Planner/Telephone Number:** Elizabeth Richardson/(805) 658-4722
- Project Applicant Name/Address:** Integrated Capital-Ventura Beach LLC
11100 Santa Monica Blvd #360
Los Angeles, CA 90025
- C. Comprehensive Plan Designation:** Planned Commercial-Tourist Oriented (PC-T)
- D. Zoning:** Commercial Tourist Oriented (CTO)
- E. Project Description:** The project proposal is for a Comprehensive Plan Amendment (CPA) and Zone Change to change the Land Use from Planned Commercial Tourist Oriented (PC-T) to Planned Mixed Use (PMXD) and change the zone from Commercial Tourist Oriented (CTO) to Coastal Mixed Use (CMXD) to facilitate the development of a new 30 unit residential development on the site currently occupied by a four-story parking structure. The site is currently developed with a 285-room hotel and parking structure which were originally constructed together in 1986. The parking structure was intended to not only provide parking for the hotel but also as additional visitor serving parking for those using the beaches in the area.
- F. Surrounding land uses and setting:** The project site is located within the Pierpont Community, which includes unique, beach-oriented, residential area, including commercial facilities. North of the project site is state beach and to the south are gas stations. East of the project site is visitor serving restaurants and hotels and to the west are residences. Allowed uses in CTO Zone include automotive repair, office, full service restaurants, fast service restaurants, and retail. A use permit is required for the existing hotel use under the current zone,

however the hotel would be permitted by right under the Coastal Mixed Use (CMXD) Zone.

G. Discretionary Permits and Approvals Required:

- a) Comprehensive Plan Amendment (CPA 7-11-6710)
- b) Zone Change (Z 3-11-5449)

H. Other Public Agencies whose approval is required: California Coastal Commission

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors highlighted in **bold** below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages:

- | | | |
|----------------------|-----------------------------|-----------------------------|
| Aesthetics | Greenhouse Gas Emissions | Population and Housing |
| Agriculture/Forestry | Hazards/Hazardous Material | Noise |
| Air Quality | Hydrology and Water Quality | Public Services/ Recreation |
| Biological Resources | Land Use and Planning | Transportation/Traffic |
| Cultural Resources | Mineral Resources | Utilities/Service Systems |
| Geology/Soils | Noise | Mandatory findings of |
| significance | | |

III. DETERMINATION:

On the basis of this initial evaluation:

X	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document

	pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Print Name

Title

IV. EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factor as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- 4) Negative Declaration: "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion within this Initial Study identifies the following:
 - a) The earlier analysis used and where it is available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) The explanation of each issue should identify: a) The significance criteria or threshold, if any, used to evaluate each question; and b) the mitigation measure identified, if any, to reduce the impact to less than significance

This Initial Study has been prepared in accordance with the CEQA Guidelines and relevant provisions of the California Environmental Act (CEQA) of 1970, as amended. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. Among the purposes of an Initial Study are:

- 1) To provide the Lead Agency (the City of San Buenaventura) with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration;
- 2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR (if possible); and
- 3) Assist in the preparation of an EIR, if one is required.

V. ENVIRONMENTAL IMPACT EVALUATION:

(References used to respond to the topic areas in Section II include those that are

identified by capital letters in Section VII of this Initial Study. If emphasis is placed on a particular reference, the capital letter corresponding to that reference may be noted in parenthesis beneath each topic area heading.)

A. Aesthetics:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Have a substantial adverse effect on a scenic vista?			X	
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
3. Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
4. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Impact Discussion:

1. The project site is located in a coastal area designated for tourist serving commercial uses and is visible from Harbor Blvd. The 1989 Comprehensive Plan designates the portion of Harbor Blvd directly adjacent to the state beach as a scenic corridor. While the project site is also on Harbor Blvd adjacent to the state beach there are no direct views from the portion of Harbor Blvd that passes in front of the project site. Although the proposed Comprehensive Plan Amendment does not include new development, the amendment is intended to facilitate demolition of the existing parking garage and the development of a 30 unit residential project on the site which will require Design Review (DRC) approval. Review and approval by the DRC assures the project would have a less than significant impact with regard to its effect on a locally designated view corridor open to public view.

2-4. The hotel and parking structure were originally completed in 1987. Currently the project site is developed with a 285-room hotel and four-story automobile parking structure. New site development will require further review and

analysis to determine any effects it may have on the surrounding area in regards to the impact of the aesthetics of the area. Light and glare generated from the building will also be addressed during the Design Review process however lighting should be contained on the subject property..

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would result in a less than significant impact with regard to aesthetic resources. Therefore, no mitigation is required.

B. Agricultural Resources:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Convert prime, unique, or statewide importance farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency, to non-agricultural use?				X
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
4. Result in the loss of forest land or conversion of forest land to non-forest use?				X
5. Involve other changes to the existing environment that, due to their location or nature, could result in a conversion of farmland to non-agricultural use?				X

Impact Discussion:

1. The project site is not designated as Prime or Unique Farmland, or Farmland of Statewide Importance (State of California Department of Conservation, Farmland, Mapping and Monitoring Program, 2002). The site is currently covered with asphaltic concrete and used for parking. There are no existing agricultural operations located on or adjacent to the proposed project site.
2. The project site is not zoned for agricultural use and is not protected by a Williamson Act contract.
3. The project site is not located in a forest.
4. See item 3 above.
5. The project site is not in agricultural production nor is it adjacent to land in agricultural production. Therefore, no impacts related to the conversion of farmland would result from the proposed project.

Mitigation/Residual Impact(s): Based on the evaluation provided above, the proposed project would not result in impacts to agricultural resources. Therefore, no mitigation is required.

C. Air Quality:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Conflict with or obstruct implementation of the applicable air quality plan?				X
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
4. Expose sensitive receptors to substantial pollutant concentrations?				X
5. Create objectionable odors affecting a substantial number of people?				X

Impact Discussion:

1. The project site is located within the Ventura County Air Basin and is under the jurisdiction of two air quality management agencies. The California Air Resources Board (CARB) is responsible for the control of the project site’s mobile emission sources, and the Ventura County Air Pollution Control District (VCAPCD) has oversight on the regulation of stationary sources.

For purposes of identifying established air quality impact thresholds, the VCAPCD and the City consider operational air quality impacts to be significant if more than 25 pounds per day of Reactive Organic Compounds (ROC) or Nitrogen Oxides (NOx) would result from a project. Significant construction-related air quality impacts would result if fugitive dust emissions are generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public.

The proposed CPA and Zone Change do not include new development. However, the amendments are intended to facilitate the development of 30 new residential units and will require DRC approval. The site is currently developed with existing buildings and parking lots. Uses allowed by the underlying zone and land use are similar to what currently exists and would not result in an increase in traffic trips, therefore the proposed boundary change would not result in ROC and/or Nox emissions in excess of 25 pounds per day.

2. See item 1 above.
3. See item 1 above.
4. The proposed project is for the change in land use only, and is located in an area that does not contain sensitive receptors. While the Comprehensive Plan Amendment will allow the use to be expanded, new construction would require amendments to the existing Conditional Use Permit and Planned Development Permit along with a Coastal Development Permit. During the use permit process any potential impacts will be identified.

5. See item 4 above.

Mitigation/Residual Impact(s): Based on the evaluation provided above, the proposed project would have no impact to air emission or air quality impacts. Therefore, no mitigation measures are required.

D. Biological Resources:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
3. Have a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means?				X
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Impact Discussion:

1. The project site is 100% developed with structures and asphalt concrete. The only vegetation on the site is ornamental landscaping. As a result, the project site contains no wetlands, riparian habitat or native plant or animal communities. This lack of natural habitat results in the absences of any unique, rare, threatened or endangered species or habitat on the site.
2. See item 1 above.
3. See item 1 above.
4. See item 1 above.
5. See item 1 above.
6. See item 1 above.

Mitigation/Residual Impact(s): Based on the evaluation provided above, the proposed project would have no impact to biological resources. Therefore, no mitigation measures are required.

E. Cultural Resources:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				X
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
4. Disturb any human remains, including those interred outside of formal cemeteries?				X

Impact Discussion:

1. The project site is not located within an area of sensitivity for Native American resources.
2. See item 1 above.
3. See item 1 above
4. See item 1 above

Mitigation/Residual Impact(s): Based on the analysis provided above, the proposed project would have a less than significant impact to the cultural resources. Therefore, no mitigation measures are required.

F. Geology and Soils:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: <ol style="list-style-type: none"> a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the 			X	

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (GP FEIR, 4.6- Geologic Hazards)				
b. Strong seismic ground shaking?			X	
c. Seismic-related ground failure, including liquefaction or landslides?			X	
d. Landslides?			X	
2. Result in substantial soil erosion or loss of topsoil?				X
3. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
4. Be located on expansive soil, as defined in 18--B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X

Impact Discussion:

1. The nearest known fault, Oak Ridge, is located approximately 1 mile from the project site. The Oak Ridge fault comprises a zone that trends northeast-southwest across the southern portion of the city. The fault has thousands of feet of subsurface displacement but is poorly defined at the surface. The fault is considered at least potentially active and probably active. The existing buildings were constructed in compliance with building codes, and any future new

construction will comply with the current building code, which includes standards for construction in seismic areas.

- a. The project site is not located within the Alquist-Priolo Earthquake Fault Zone.
- b. Future seismic events could produce ground shaking throughout the city as well as surface rupture in some areas where future development could be accommodated. Ground shaking and surface rupture could damage structures and/or create adverse safety effects. Compliance with city policies, in combination with requirements of the Uniform Building Code and the Alquist-Priolo legislation will be required.

The project site is located within a liquefaction zone. However, the proposed CPA does not include any new development. New construction will be required to provide geology reports containing information regarding the liquefaction potential on the site at the time of building permits or entitlements. In order to receive building permits the applicant is required to submit appropriate documentation by a qualified expert providing a description of subsurface conditions and recommendations for site developments in accordance with Uniform Building Code (UBC) requirements. The implementation of this and other standard development project conditions imposed under requirements of the UBC assure that the project would have a less than significant impact.

- c. The proposed project site is not located within an area subject to landslides.
2. The proposed project site will not result in substantial soil erosion or loss of topsoil since the site is 100% developed and no new construction is proposed.
 3. See item 1c above.
 4. The project area is not in an area with significant know risk of expansive soils.
 5. The project site is served by City sewer.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact with regard to the geology/soils issue area. Therefore, no mitigation measures are required.

G. Greenhouse Gas Emissions:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
2. Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.			X	
3. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	

Impact Discussion:

1. The Comprehensive Plan Amendment (CPA) and Zone Change will facilitate the development of the area currently occupied by the four story parking structure with 30 residential units. Although the additional residential units will intensify the use of the site it will not significantly increase traffic or other activities that would have the potential to increase the generation of greenhouse gases. Therefore, the greenhouse gas emissions should not have a significant impact on the environment.
2. See #1 above
3. See #1 above

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact with regard to the greenhouse gas emissions issue area. Therefore, no mitigation measures are required.

H. Hazards and Hazardous Materials:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (http://www.envirostor.dtsc.ca.gov/public)				X
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
6. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
8. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

Impact Discussion:

1. The proposed amendment would only add an additional 30 residential units to an area that already transitions from residential to commercial. The uses permitted by the proposed CMXD zone would not result in transport, use, or disposal of hazardous materials.
2. The proposed project would be required to comply with the city's Hazardous Material regulations regarding storing, using and discarding chemical products typically used during the operation of a hotel.
3. The project site is not within a quarter mile of any schools.
4. The project site is not listed as a hazardous materials site.
5. The project is not located within an airport land use plan.
6. The project site is not located within the vicinity of a private airstrip.
7. The project site does not include new development and therefore would not interfere with an emergency response plan.
8. The project site is not located within a wildlands area.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact upon the hazards issue area. Therefore, no mitigation measures are required.

I. Hydrology and Water Quality:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Violate any water quality standards or waste discharge requirements?			X	
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?				X
4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				X
5. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
6. Otherwise substantially degrade water quality?				X
7. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
8. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?				X
9. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
10. Inundation by seiche, tsunami, or mudflow?			X	

Impact Discussion:

1. New development is not proposed as part of this project. The amendment is intended to facilitate the development of new residential units that will require DRC approval. Any new construction must comply with Ventura County National Pollution Discharge Elimination System (NPDES). At the time of any new construction the project will obtain NPDES permit approval in order to proceed. The project would result in no impact with regard to the addition/withdrawal of groundwater since it would utilize city water.
2. The project would result in no impact with regard to the addition/withdrawal of groundwater since it would utilize city water.
3. The project would not alter the existing drainage pattern of the site as the site is currently developed with structures and parking lots. When new construction is proposed for the site the impact to the drainage patterns on the site will be identified and any potential impacts mitigated.
4. See item 3 above.
5. The site is currently developed with structures and paved parking area. New development is not proposed on the site and will not create new runoff on the site.

6. 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. However, because the project is subject to the requirements of the City of San Buenaventura and County of Ventura National Pollution Discharge Elimination System (NPDES) permit for municipal storm water runoff, the conditions of which limit the volume of contaminants allowed to enter storm drain system, impacts are considered to be less than significant.
7. The project site is not located within the 100 year flood plain.
8. According to Figure 6.6-5 in the City of San Buenaventura's *Comprehensive Plan Update to the Year 2010 Final Master EIR* and Figure 4.8-4 *FEMA Flood Zones of the 2006 General Plan EIR*, the project area is not located within a 500-year flood plain, a 100-year flood plain, or a floodway. Compliance with standard grading and building conditions will ensure that the project will not be substantially damaged by 100-year floodwaters. Therefore, the project will not place any structures within a flood hazard area and no impacts are anticipated.
9. The site is currently developed and used for commercial activities and is a significant distance from the ocean. The change in land use and zoning will not further expose people to dangers associated with the Pacific Ocean tides.
10. The 2005 City of Ventura General Plan FEIR identifies the Pierpont area, including the project site and existing development to the south and west of Highway 101, is located within a Tsunami Risk Area. In the event of a tsunami the project area could be inundated with ocean water due to a rise in the sea level once a tsunami hit the coastline. Existing ocean monitoring equipment can reasonably predict when and where such extreme wave action would hit the coastline and feasible adequate evacuation warning could be given to the residents and guests.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact with regard to water quality and hydrology issues. Therefore, no mitigation measures are required.

J. Land Use and Planning:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Physically divide an established community?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
3. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Impact Discussion:

1. The project does not propose new construction that would divide the area.
2. The addition of 30 residential units would require a zone change from Commercial Tourist Oriented (CTO) to Coastal Mixed Use (CMXD) as well as the land use change to Planned Mixed Use (PMXD). The current land use designation and zone do not permit residential to be constructed on the property. However with a zone change and comprehensive plan amendment the additional residential units would be allowed with review and approval by the City's Design Review Committee. The new zone will continue to allow tourist serving commercial uses including restaurants, retail and hotels. The new residential units will be compatible with the surrounding area because the new units will be adjacent to existing residential and will be a transition between the commercial uses along Harbor Blvd and the residential uses along Pierpont Blvd.
3. The site is currently fully developed and is not located within a habitat or natural community conservation plan area.

Mitigation/Residual Impacts: Based on the above discussion, the proposed project would have a less than significant impact to the land use/city and regional plans issue area. Therefore, no mitigation measures are required.

K. Mineral Resources:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Result in the loss of availability of known mineral resource that would be of value to the region and the residents of the state?				X
2. Result in the loss of availability of a locally-important mineral resource recovery site delineated on the General Plan, specific plan, or other land use plan?				X

Impact Discussion:

1. The City of San Buenaventura 2005 General Plan FEIR and the Ventura County General Plan Resource Protection Map (Amended 1996) indicate that the project site is not located within an identified Mineral Resource Zone.
2. See item 1 above.

Mitigation/Residual Impact(s): Based on the analysis provided above, the proposed project would not result in significant energy or mineral resource impacts. Therefore, no mitigation measures are required.

L. Noise:

Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
2. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				X

Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
3. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
4. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				X
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
6. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

Impact Discussion:

1. The proposed project would not result in the establishment of a land use that would have the potential to expose people to noise levels that exceed established standards. Although the existing hotel and service station could produce noise levels that exceed established standards, the nature of these levels would be short term, and the design of a residential project that may eventually occupy the subject site would incorporate features to minimize any existing short term noise impacts.
2. The proposed project would not result in the establishment of a land use that would have the potential to expose people to excessive ground borne vibration or noise levels.
3. The project site is adjacent to a hotel and state beach to the north and west, a service station to the east and residential to the south and west. The proposed amendment to change the zone and land use to allow 30 residential units would not result in operations that would have the potential to increase noise levels at or adjacent to the project site, or result in the generation of traffic that would have the potential to result in significant off-site noise impacts. Therefore, the proposed project would result in a less than significant short and long-term noise impacts.

4. The proposed amendment to change the zoning and land use to allow 30 residential units would have the potential to increase the number of people at the site. However, the noise levels generated would not exceed the levels that could be generated by other allowed uses in the zone including outdoor sports and recreation and shopping centers. The use permit process for the hotel expansion would review the design of the project and the impacts additional noise may have on the area.
5. The project site is not located within an airport land use plan area.
6. The project site is not within the vicinity of a private airstrip.

Mitigation/Residual Impact(s): Based on the impact evaluation provided above, the proposed project would have a less than significant impact to noise. Therefore, no mitigation measures are required.

M. Population and Housing:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
2. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?				X

Impact Discussion:

1. Development can result in a growth inducing impact when it requires the extension of urban infrastructure or utility services into or near areas that are presently not provided with those services. The proposed project site is currently 100% developed and located in an urbanized area that is served by infrastructure and utility systems. The proposed project would not require the extension of urban infrastructure or result in the urbanization of land in an isolated location. Therefore, the project would not result in a significant growth inducing impact.
2. The proposed project would not result in the displacement of any existing housing units.

Mitigation/Residual Impact(s): Based on the impact evaluation provided above, the proposed project would have no impact to population or housing impacts. Therefore, no mitigation measures are required.

N. Public Services & Recreation:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following:			X	
a. Fire protection?			X	
b. Police protection?			X	
c. Schools?			X	
d. Parks?				X
e. Other public facilities?				X
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
3. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Impact Discussion:

- 1a. The Ventura Fire Department (VFD) provides fire protection service for the city. The VFD Fire Suppression Division provides direct responses to fire, emergency medical, hazardous material, hazardous conditions and public service incidents from five fire stations. All fire-fighting personnel are certified medical technicians. The project site is located approximately 1.1 miles from City Fire Station No. 2, at 41 S. Seaward Avenue and the site can be reached within reasonable response times.
- 1b. The Ventura Police Department (PD) provides law enforcement and police protection within the city. The Ventura PD maintains a countywide mutual aid agreement with all law enforcement agencies within Ventura County. The closest police station is located approximately 5.1 miles from the project site at 1425 Dowell Drive. The proposed land use change would not place undue demands on police protection services.
- 1c. Any new development is subject to payment of School Mitigation Fees at issuance of building permits pursuant to state law. Future development of the site as allowed by the proposed Comprehensive Plan Amendment would not have the potential to generate substantial population growth and therefore would not result in the need for construction of new school facilities.
- 1d. The Comprehensive Plan does not intend for the project site to provide public recreational facilities. Therefore, there is no impact related to this issue area.
- 1e. The project would utilize no "other public facilities". Therefore, no impact would result.
2. The additional residential units that could be potentially constructed on the site would increase the population for the Pierpont area. However, there are sufficient recreation facilities to accommodate the new residents including San Buenaventura State Beach, Pierpont beach and Marina Park.
3. The project does not propose to construct or expand any new recreation facilities.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact with regard to the public services issue area. Therefore, no mitigation measures are required.

O. Transportation/Traffic:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X
2. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				X
3. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
4. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
5. Result in inadequate emergency access? (2005 GP- Our Healthy and Safe Community)				X
6. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X

Impact Discussion:

1. The city utilizes Existing + Approved Project traffic conditions as a basis for determining the significance of traffic impacts. The city considers a Level-of-Service (LOS) of D at freeway interchange intersections and a LOS C for surface street intersections and roadway segments as acceptable. Level of service (LOS) relates to driving conditions, and is ranked from best to worst using an A through F ranking system. For purposes of this analysis, the proposed project would result in significant traffic and circulation impacts if it causes any intersections to operate at or below a Level-of-Service (LOS) C.

The proposed CPA and Zone Change do not include new development but is intended to facilitate the development of 30 residential units. However, the residential units are not anticipated to result in traffic levels that would decrease LOS of surrounding streets to less than a C.

2. See discussion under item #1 above.
3. The project will not affect air traffic patterns.
4. The project will not alter the roadway pattern or add incompatible traffic uses to the area.
5. The project site is currently developed with buildings and parking areas. The land use amendment and zone change will not alter roadways or access points and will not affect emergency access to the area.
6. The project does not propose new construction or alterations to the existing public transportation policies in the area.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have no impact with regard to the transportation/traffic issues in the area. Therefore, no mitigation measure(s) is required.

P. Utilities and Service Systems:

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
2. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
3. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
4. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
5. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
6. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
7. Comply with federal, state, and local statutes and regulations related to solid waste?				X

Impact Discussion:

1. Four districts, each with its own treatment facility, provide sewage service within the general Ventura area. The City of Ventura currently serves the project site. The wastewater system primarily utilizes a gravity flow wastewater line that corresponds to natural drainage patterns. The city's standard for sewer line capacity is a maximum line capacity of 50% for pipes 15-inches and smaller, and 75% for pipes 18-inches and larger. Any post-development increase over these

sewer line capacity standards would be considered a potentially significant impact unless mitigated.

The existing parking garage currently does not connect to the city's wastewater system. Although the Project does not include any new development, the LCPA will facilitate the future development of 30 residential units that would result in an increased demand for wastewater treatment services. When new construction is proposed for the site the capacity of the system would be studied during the development process.

2. See item 1 above.
3. See item 1 above.
4. The City of San Buenaventura supplies water to the proposed project site. The primary water sources for the project site include three groundwater basins. Water diverted from the Ventura River is also used to service development on the eastern side of the city. Significant impacts would result under this issue area if sufficient domestic and/or fire protection water supply was not present to serve the project's current and long-term needs. The 2005 General Plan FEIR estimates the total water available for city use to be 28,262 acre-feet per year (AFY). The total water consumption reported in 2003 was 20,365 AFY. Therefore, adequate citywide capacity exists to satisfy the project sites peak domestic and irrigation demands, as well as fire protection flow rates at acceptable residual pressures. Therefore, given the above discussion regarding water service, the proposed project would have a less than significant impact with regard to the water service issue area.
5. See item 4 above.
6. Solid waste disposal is an issue of regional and statewide significance. The traditional method of landfill disposal is becoming increasingly problematic, as landfills approach or reach their capacity and the ability to find and develop new landfills is complicated by numerous environmental, regulatory and political concerns. In 1991, the city adopted a Source Reduction & Recycling Element (SRRE), under the mandate of the California Integrated Waste Management Act. Waste reduction programs from the SRRE that are being implemented include recycling programs, re-use programs, and regional materials recovery.

Solid waste disposal in Ventura County can be disposed at any landfill depending upon the preference of individual solid waste haulers and other factors, such as proximity to the collection area, tipping fees, and daily capacities at the landfill sites. Currently, most solid waste collected within Ventura County by public and private haulers is disposed of in the County. At the time of new development for the site the project will be required to implement site specific source reduction, recycling, and re-use programs to comply with AB 939.

Mitigation/Residual Impact(s): Based on the above discussion, the proposed project would have a less than significant impact with regard to the utilities and services issue area. Therefore, no mitigation measures are required.

Q. Mandatory Findings of Significance:

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impacts
1. Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
2. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
3. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Findings Discussion:

1. Based on the information obtained in the preparation of this Initial Study and the inclusion of proposed conditions of approval, the proposed project would not 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, reduce the number of restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory, The project is located in an urban setting and is already developed with structures and parking lots with little to no vegetation. Therefore, the land use change would not affect rare or endangered plant or animal communities or any significant historical or cultural resources.

2. Based on the information obtained in preparation of this Initial Study, as well as Ordinance Code requirements and permit conditions applicable to the project, no potentially significant individually limited or cumulative impacts were identified.
3. Based on the information contained in this Initial Study, the proposed project does not have the potential to directly or indirectly cause substantial adverse effects on humans.

VI. CIRCULATE TO THE FOLLOWING AGENCIES/PERSONS:

VENTURA COUNTY

Agricultural Commissioner	<input type="checkbox"/>	Ventura County Clerk/Recorder* 1 original, 4 copies, unstapled (hand deliver to County)	<input checked="" type="checkbox"/>
Local Agency Formation Commission (LAFCO)	<input type="checkbox"/>		
County of Ventura Resource Management Agency, Attn: Planning* <input checked="" type="checkbox"/> Director (6 hard copies)	<input checked="" type="checkbox"/>	Ventura County Transportation Commission* (VCTC)	

ADJACENT COUNTIES

Kern County Planning & Development Services	<input type="checkbox"/>	County of Santa Barbara Planning Division	<input type="checkbox"/>
County of Los Angeles Dept. of Regional Planning Impact Analysis Section	<input type="checkbox"/>		

ADJACENT CITIES

City of Oxnard	[X]	City of Ojai	[]
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OTHER PUBLIC AGENCIES

Air Pollution Control District*	[X]	Ventura County Organization of Government (VCOG)	[]
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Ventura County Solid Waste Management Department	[X]	Ventura Regional Sanitation District*	[X]
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Casitas Mutual Water District	[]	South Coast Area Transit (SCAT)	[X]
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Ventura Unified School District	[X]		
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LIBRARIES

Avenue Branch Library*	[X]	E.P. Foster Branch Library	[X]
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STATE AGENCIES

California Coastal Commission South Central Coast Area Office	[X]	Southern California Association of Governments (SCAG)* (3 copies)	[X]
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California Dept. of Fish & Game (Santa Barbara)	[X]	Caltrans District 7 Environmental Section	[X]
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California Regional Water Quality Control Board	[X]	State Department of Parks and Recreation	[]
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California Integrated Waste Management Board, Permits Section	[X]	Dept. of Boating & Waterways	[]
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California Department of Toxic Substances Control	[]	State Clearinghouse (10 copies)	[]
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FEDERAL AGENCIES

U.S. Army Corps of Engineers	[X]	U.S. Fish & Wildlife Service	[]
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CITIZEN GROUPS

Audubon Society	[]	Sierra Club	[]
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Building Industry Association Greater Los Angeles/Ventura	[X]	California Trout	[]
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Region of Southern California, Inc.		Surfrider Foundation	[X]
Environmental Coalition	[]	Friends of the Ventura River	[]
Environmental Defense Center	[]	League of Women Voters	[]
Friends of the Santa Clara River	[X]	Santa Ynez Band of Mission Indians	[]
Ventureano Canaliano Chumash	[]	Owl Clan Consultants	[]
Candelaria American Indian Council	[]	Montalvo Property Owners Association	[]
Ventura County Archaeological Society	[]	Foothill Road Homeowners Association	[]
Westside Community Council	[]	East Ventura Community Council	[]
Downtown Community Council	[]	Midtown Community Council	[]
Pierpont Community Council	[X]		

*Indicates agency/person always receives notice.

VII. LIST OF REFERENCES:

These references, and those previously cited within the text of this Initial Study/Environmental Assessment, are intended to provide a list of Supporting Information Sources and/or evidence staff has relied upon in completing this document and in reaching the conclusions contained herein. In addition, the materials that were submitted by the applicant have also been used in completing this document.

If any person or entity reviewing this Initial Study/Environmental Assessment has a question regarding the supporting information source and/or evidence, they may contact the staff planner at the address and telephone number noted on the front page of this document during the public review period.

- A. Comprehensive Plan, including all technical appendices, maps.
- B. General Plan Final Environmental Impact Report prepared and certified therefore - City of San Buenaventura, 2005.
- C. Zoning Ordinance, including all maps and the Negative Declaration (EIR-2010) prepared and adopted therefore - City of San Buenaventura, 1992.
- D. Annual Transportation Report, Technical Appendix – City of San

Buenaventura, April 2002

- E. Countywide Solid Waste Management Plan - Ventura County Solid Waste Management District, 1985.
- F. Air Quality Mitigation Program - City of San Buenaventura, 1993.
- G. Noise Ordinance - City of San Buenaventura.
- H. Federal Emergency Management Agency (FEMA) MAPS, 1987.
- I. Uniform Building Code,.

VIII. PERSONS AND/OR AGENCIES CONSULTED DURING PREPARATION OF THIS INITIAL STUDY/ENVIRONMENTAL ASSESSMENT:

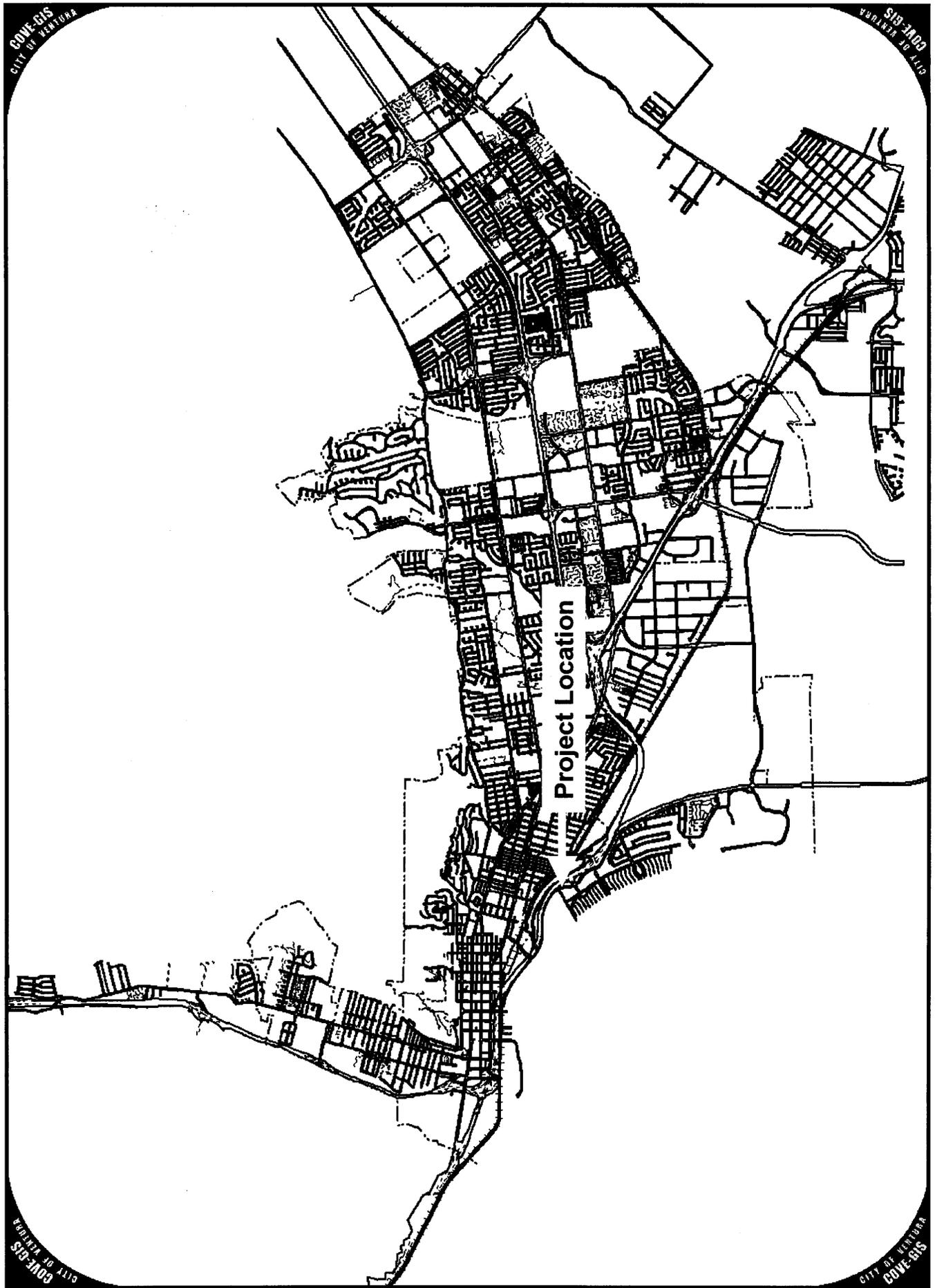
<u>Person</u>	<u>City Agency</u>	<u>Comments</u>
None		

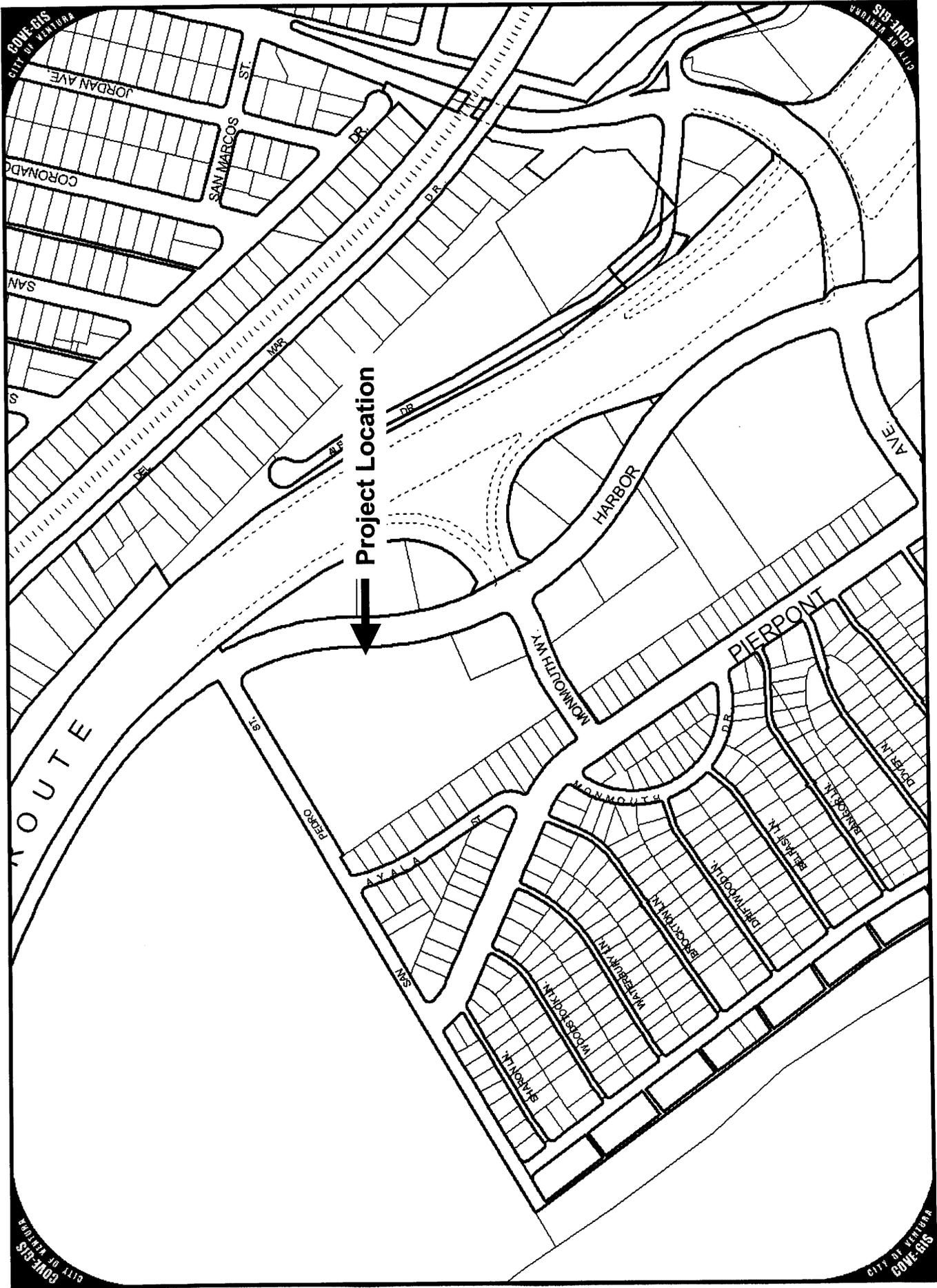
IX. ATTACHMENTS:

- A. Project Site Information

ATTACHMENT A

Project Site Information





Project Location



CITY OF VENTURA
COWE GIS

CITY OF VENTURA
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