City of Ventura

Olivas Park Drive Extension Project

Final

Environmental Impact Report

SCH # 1995081004

Volume I: Report

June 2014

Environmental Scientists Planners Engineers

City of Ventura

Olivas Park Drive Extension Project

Final
Environmental Impact Report

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Project #1805
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Volume I: Report

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City of Ventura
Olivas Park Drive Extension Project

Environmental Impact Report

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EXECUTIVE SUMMARY

This section summarizes the characteristics of the proposed Olivas Park Drive Extension, alternatives, environmental impacts associated with the project, recommended mitigation measures, and the level of significance of impacts after mitigation.

PROJECT SYNOPSIS

Project Proponent

City of Ventura
Public Works Department
501 Poli Street
Ventura, CA 93002

Project Description

Project Characteristics

The project site is located between Golf Course Drive and Johnson Drive, primarily in the City of Ventura. Portions of the road alignment and levee are in unincorporated Ventura County.

The proposed project involves: (1) the extension of Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive; (2) a levee/floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River that terminates 350 feet south of the Southern Pacific Railroad; (3) General Plan amendments for land use changes for parcels within the ~~110.83~~139-acre project boundary, (4) a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan; and (5) zone changes for parcels within the project boundaries. The proposed project also includes a pre-zone and annexation of one County parcel. The proposed zoning and land use amendments could accommodate a maximum of 1,258,000 square feet of commercial development and 75,000 square feet of industrial development. The proposed roadway extension will transition to join the existing improvements at the Johnson Drive/U.S. 101 southbound ramps interchange. No improvements other than the transition are proposed as part of this project at the Johnson Drive/U.S. 101 interchange. Additionally, the Montalvo Community Services District (MCSD) would abandon and remove the existing wastewater treatment plant components of the MCSD, and the wastewater treated at this facility would be diverted to the City's wastewater facility. ~~In addition, there~~ There ~~are no future improvements planned or proposed by the City at this interchange.~~

Olivas Park Drive would have a cross-section that varies between 82 feet and 88 feet, and includes two 11-foot travel lanes, two 12-foot travel lanes, a 14-foot median, and two 6-foot bike lanes. Between Golf Course Drive and Perkin Avenue, Olivas Park Drive will have 8-foot sidewalks on both sides of the street. East of Perkin Avenue, Olivas Park Drive will have a 10-foot sidewalk on the north side and no sidewalk amenities on the south side. The new sidewalk at Olivas Park Drive will tie in with the existing sidewalk at Auto Center Drive. The proposed roadway extension would also include a new storm drain connection to the Santa Clara River.

As part of a separate action, the existing wastewater treatment components at the Montalvo Community Services District (MCSD) would be abandoned and removed. Wastewater currently treated at this facility would be diverted to the City's Ventura Water Reclamation Facility (VWRF) from the terminus of the MCSD system to the existing sewer trunk line in Olivas Park Drive.

Project Objectives

The City's objectives for the proposed project are as follows:

To improve circulation in the area by providing a link between Johnson Drive and the current terminus of Olivas Park Drive
To protect existing and future development in the project site vicinity from flooding along the Santa Clara River
To allow for the logical development of the project site vicinity with commercial uses compatible with those within and around the Ventura Auto Center
To allow for commercial development that would provide local jobs and increase the City's sales tax base

Required Approvals

Implementation of the proposed Olivas Park Drive Extension project would require the following discretionary approvals from the City and other agencies:

Required Discretionary City Approvals

Certification of the EIR
General Plan Amendment for Figure 4-3, Roadway Classification Plan to revise the classification of Olivas Park Drive between Golf Course Drive and Auto Center Drive from "collector" to "secondary arterial"
General Plan Amendment to revise Figure 6-1, Public Facilities to eliminate the linear park shown on the south side of Olivas Park Drive between Victoria Avenue and Johnson Drive
General Plan Amendment to re-designate parcels from Agriculture to Commerce, Specific Plan to Commerce, Industry to Commerce, and Agriculture to Industry, and Agriculture to Parks & Open Space
Rezone from: M-1, M-2, MPD, ~~Agricultural and~~ R-1-1AC, and OS-80 (County) to CPD; ~~and~~ R-1-1AC to MPD; and M2 and R-1-1AC to Parks
Specific Plan Amendment to revise the boundaries of the Auto Center Specific Plan
Adoption of the required findings pursuant to the City's SOAR Ordinance to allow the City Council to redesignate 58.6 acres south of the proposed Olivas Park Drive extension that are currently designated as "Agriculture" to "Commerce", "Industry", and "Parks and Open Space"
Annexation of the Montalvo Community Services District parcel.

Discretionary Approvals Required from Other Agencies

Ventura County Watershed Protection District approval of new storm drain to Santa Clara River

Letter of Map Revision (LOMR), Watershed Permit (FEMA)
Section 401 Certification, Regional Water Quality Control Board
Section 404 Permit, Army Corps of Engineers (ACOE)
Section 1603 Permit (Streambed Alteration Agreement), California Department of Fish and Wildlife
State and Federal Endangered Species Act Compliance, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and National Marine Fisheries Service
Potential Caltrans Encroachment Permit for any work associated with the Johnson Drive southbound on- and off-ramps from U.S. Highway 101

ALTERNATIVES

This EIR examines four alternatives, as described below.

Alternative 1: No Project (no development - no change to existing land uses)

Alternative 2: Existing General Plan

Alternative 3: Olivas Park Drive Extension Only

Alternative 4: Minimal Prime/Statewide Importance Farmland Conversion

Each of the alternatives would address one or more of the significant environmental impacts of the proposed project. The No Project Alternative would avoid all of the proposed project's adverse environmental impacts. However, it would not remediate existing soil and groundwater contamination and would not eliminate the potential for future development proposals within the project site. Moreover, it would not meet any of the project objectives. Both the Existing General Plan Alternative and Minimal Prime or Statewide Importance Farmland conversion alternatives would have reduced impacts as compared to the proposed project in most issue areas due to the overall reduction in development potential. Both of these alternatives would also substantially reduce, but not eliminate, the unavoidably significant impact related to conversion of Prime and Statewide Importance farmland to non-agricultural uses. However, these alternatives would not meet objectives related to development of the project site with commercial and industrial uses and allowing for commercial development that would provide local jobs and increase the City's sales tax base to the same degree that the proposed project would.

The Olivas Park Drive Extension Only alternative would reduce impacts in most issue areas and would substantially reduce, but not eliminate, the unavoidably significant impact related to conversion of Prime and Statewide Importance Farmland to non-agricultural uses. The City would not need to make findings with respect to the SOAR Ordinance under this alternative and no changes to the hydrology of the Santa Clara River would occur since there would be no levee. On the other hand, onsite flooding issues would remain and would serve as an impediment to future development on the project site. As such, this alternative would not meet several key project objectives.

AREAS OF PUBLIC CONTROVERSY

Based on the responses to the Notice of Preparation of a Draft EIR, areas of public controversy include railroad safety, air emissions (construction and operation), carbon monoxide hotspots,

greenhouse gas emissions, biological resources, endangered plant and animal species, floodplain and floodway impacts, water quality, increased traffic on Ventura County Regional Road Network, water supply, wastewater conveyance and treatment, and potential creation of county "islands." 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 are 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. Class I impacts are significant environmental impacts for which there is no feasible mitigation to reduce the impact to below a level of significance. 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, ~~two~~ one project impact wa~~s were~~ found to be significant and unavoidable (Class I), and the project would contribute to a cumulative impact that is likewise significant and unavoidable (Class I). ~~These is~~The project impact pertains to the conversion of Prime Farmland (AG-1)~~ and the increase in traffic levels on study area intersections (T-1) and the cumulative aesthetic impact related to the conversion of agricultural land~~. ~~Although the project's aesthetic impacts are not identified as significant, t~~The project would also ~~also~~ contribute to a significant cumulative aesthetic impact related to the conversion of lands designated for agricultural use to non-agricultural uses; therefore, cumulative aesthetic impacts are also significant and unavoidable. The remaining ~~project-generated~~direct, indirect and cumulative impacts can be mitigated to a less than significant level through implementation of proposed mitigation measures, or were found to be less than significant without mitigation. ~~Although the project's aesthetic impacts are not identified as significant, the project would contribute to a significant cumulative aesthetic impact related to the conversion of lands designated for agricultural use to non-agricultural uses.~~

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
AESTHETICS		
Impact AES-1 The proposed project would involve development that could alter views for travelers along the scenic corridors of the U.S. 101 and Olivas Park Drive. However, the project site does not offer any scenic vistas or scenic resources. Impacts to scenic vistas and scenic resources would be Class III, less than significant.	None required.	Less than significant.
Impact AES-2 Development facilitated by the proposed project would alter the visual character of the project site by replacing agricultural land with commercial uses. While this would be a substantial change from current conditions, future development would be visually compatible with surrounding uses. Thus, the project-specific direct impact to the project site's visual character would be Class III, less than significant. However, the project would make a substantial contribution to a significant visual character impact related to citywide agricultural land conversion. Therefore, cumulative impacts would be significant.	None ~~required~~available to address the significant cumulative impact.	Less than significant direct project impacts, ~~though~~but the cumulative impact would be significant and unavoidable.
Impact AES-3 The proposed project would introduce new sources of light and glare to the project area through roadway lighting, new buildings and parking lots. However, there are no sensitive uses in the project vicinity and compliance with existing City design standards would ensure the appropriateness of light fixtures and building materials. Impacts resulting from light and glare would be Class III, less than significant.	None required.	Less than significant.
AGRICULTURAL RESOURCES		
Impact AG-1 Construction of the roadway extension, levee, and development facilitated by the proposed project would involve the conversion of about ~~62~~ 30-31 acres of State-designated Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Proposed mitigation would reduce this impact to the degree feasible, but would not reduce the impact to below a level of significance. Therefore, this would be a Class I, significant and unavoidable, impact.	The City of Ventura participates in a number of programs and policies specifically aimed at conserving agricultural lands both within and adjacent to the City limits. These include the SOAR Ordinance, which requires voter approval for redesignation of agriculturally-designated lands, and two separate greenbelt agreements that maintain farmland between Ventura and the cities of Oxnard and Santa Paula. ~~No~~ In addition, the following measure is proposed:~~mitigation is available.~~ **AG-1 Agricultural Conservation Easement.** Mitigation shall be provided for the loss of state-designated Prime Farmland	Reduced to the degree feasible, but ~~S~~significant and unavoidable.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	and Farmland of Statewide Importance in existence at the time property in the project area containing such state-designated Farmland is developed. Applicants seeking to develop such state-designated Farmland shall cause to be set aside in perpetuity agricultural lands of equivalent acreage (a 1:1 ratio) and with soil and farming conditions equivalent or superior to the state-designated Farmland that the applicant seeks to convert to other uses. The applicant shall either purchase one or more permanent, irreversible agricultural easements for the benefit of the City or other qualifying entity acceptable to the City, or contribute funds to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements, to be earmarked for the purchase of permanent, irreversible agricultural easements. The protected acreage equal to the total acreage of, and of equivalent soil and farming conditions to, the state-designated Farmland to be converted shall be set aside prior to the commencement of any development activity.	
Impact AG-2 In the near term, development facilitated by the proposed project could minimally increase the potential for compatibility conflicts between ongoing agricultural operations and non-agricultural uses. However, in the long term, the elimination of agricultural activity from the project site would eliminate this potential conflict. Impacts related to the agriculture/urban interface would be Class III, less than significant.	None required.	Less than significant.
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 required.	Less than significant.
Impact AQ-2 Operational emissions of ROG and NOX associated with anticipated maximum development potential of the project area would exceed VCAPCD thresholds. However,	**AQ-2 Energy and Transportation Related Emission Reduction.** Future project site developers shall prepare project-specific air quality studies to determine if their proposed development would generate emissions	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
these impacts are mitigable with incorporation of emissions reduction measures and payment of Air Quality Mitigation Fund fees. Therefore, the project would have a Class II, significant but mitigable, impact to regional air quality.	exceeding the 25 lbs/day VCAPCD significance threshold. Project-specific air quality emissions reports may be completed as stand-alone studies or may be incorporated into required CEQA analysis of individual projects. Applicants of development projects determined to exceed the 25 lbs/days threshold shall implement one or more of the following in order to reduce emissions of ROG and NOx to 25 lbs/day or less. • **Energy Efficiency.** The commercial and industrial structures proposed for development within the project area shall be designed to increase energy efficiency 20 percent 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. • **Transportation Demand Management Plan.** The applicant shall prepare and implement an on-site Transportation Demand Management (TDM) Plan. In the course of completing the environmental evaluation, the TDM Plan will be reviewed by, and must meet the requirements of, the City Planning Department. **Air Quality Mitigation Fund.** For any remaining emissions above 25 lbs/day after other mitigation measures are implemented, 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 project area. The total amount that would be contributed to this fund shall be calculated based upon the methodology described in Ordinance 93-37. 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.	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
Impact AQ-3 Increased traffic congestion associated with anticipated maximum development potential of the project area would potentially increase carbon monoxide (CO) concentrations at congested intersections. However, Basin-wide CO concentrations are forecast to remain within federal and state standards. Therefore, impacts relating to CO "hot spots" would be Class III, less than significant.	None required.	Less than significant.
BIOLOGICAL RESOURCES		
Impact BIO-1 The proposed project would result in the reduction of native plant communities and man-made habitats, which could affect special status and protected wildlife species. This impact would be Class II, significant but mitigable.	**BIO-1(a) Preconstruction Special Status Wildlife Surveys and Construction Monitoring.** Not more than one week prior to vegetation clearing and initial ground disturbance activities within the project site, focused preconstruction surveys for special status wildlife species shall be conducted by qualified biologists within the construction footprint and within a 200-foot survey buffer area. The surveys shall include mapping of current locations of special-status wildlife species for avoidance and relocation efforts and to assist construction monitoring efforts. CDFW species of special concern, which are not federally listed, shall be captured by qualified biologists, when possible, and relocated to adjacent appropriate habitat to the project area (at least 200 feet from the grading limits). In addition, during any construction activities involving vegetation clearing or initial ground disturbance activities, the applicant shall contract with a biologist or biological consulting firm to conduct biological monitoring to avoid and minimize impacts to special status wildlife and protected nesting birds in the path of construction. Wildlife observed during construction activities shall be captured by qualified biologists, when possible, and relocated to suitable habitat onsite at least 200 feet from the grading limits. If active woodrat nests are found during the peak nesting season (February 1 through May 31), a 50-foot radius buffer area shall be established around the nests and land clearing activities shall be postponed until the end of peak nesting season to protect the nest. Outside of the peak nesting season, nests shall be relocated under the direction of a qualified biologist. Nest material shall be carefully and slowly picked	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	up to allow any woodrats to escape and placed in similar suitable habitat at least 100 feet from the project boundary. CDFW shall be notified and consulted regarding the presence of any special status wildlife species found onsite during the preconstruction surveys or during biological monitoring. If a federally listed species is found prior to or during grading of the site, the USFWS shall also be notified. Only a USFWS approved biologist shall be allowed to capture and relocate listed species. The methods and results of the preconstruction surveys and any relocation efforts during those surveys shall be documented in a brief letter report and submitted to the City no later than three weeks following the completion of the last survey. The methods and results of the biological monitoring and any relocation efforts conducted during construction shall be documented in a brief letter report and submitted to the City upon completion of vegetation clearance and initial ground disturbance activities. **BIO-1(b) Conduct Nesting Bird Surveys, Provide Establish Active Nest Avoidance Buffers, and Monitor Active Nests.** Vegetation clearing, construction activities, grading activities, staging/mobilization activities (collectively, "development activities") shall avoid any nests of native birds. To the extent feasible, development activities shall be planned to avoid the breeding and nesting season (February 1 – August 31). If the City determines that breeding season avoidance is not feasible, a qualified biologist shall conduct a minimum of three nesting bird surveys, within two weeks, and no more than three days prior to the start of vegetation or nesting habitat disturbance. Weekly bird nesting surveys shall be reinitiated if land clearing and disturbance activities are delayed for more than one week. The nesting bird survey area shall include a buffer around the grading limits of 500 feet. If an active bird nest is found, an appropriate buffer shall be established surrounding the nest(s) and shall be flagged for avoidance. The avoidance buffer shall be determined by the monitoring biologist based upon the species nesting and the activity being conducted. If an active nest of	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	a special status bird species is found, a suitable buffer area will be determined in coordination with CDFW/USFWS. If active bird nests are found and avoidance buffers are established, construction work shall be delayed within these areas until after the nesting season or until the young are no longer dependent upon the nest site. Alternatively, construction within the buffer area may be conducted at the discretion of a qualified biological monitor. The biologist shall monitor the active nest(s) during initial disturbance activities and/or development activities to determine if the recommended avoidance buffers are adequate and that the nests are not being stressed or jeopardized. The methods and results of the nesting bird surveys, any nesting bird avoidance efforts as a result of those surveys, and the success of the avoidance buffers shall be documented in a brief letter report and shall be submitted to the City no later than three weeks following the completion of active nest monitoring activities. **BIO-1(c) Conduct Least Bell's Vireo and Southwestern Willow Flycatcher Surveys.** Development activities within 500 feet of the Santa Clara River riparian corridor shall be avoided during the least Bell's vireo (April 10 to July 31) and southwestern willow flycatcher (May 15 to July 17) breeding season. If the City determines that breeding season avoidance is not feasible, a permitted biologist shall conduct focused presence/ absence surveys in accordance with the USFWS protocols for least Bell's vireo (2001) and southwestern willow flycatcher (2003). Any survey methodology that deviates from these protocols shall be approved by the USFWS prior to initiation of the first survey. Surveys shall focus on riparian habitat associated with the Santa Clara River within the project site and adjacent suitable habitat out to 500 feet. Protocol surveys shall be conducted within one year of start of construction (i.e. breeding season prior to), and will continue annually until completion of construction activities if presence is documented in the first year. Documentation of findings, including a negative finding must be submitted to the USFWS for review. If neither species is detected, no further actions are required.	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	If least Bell's vireo or southwestern willow flycatcher are found nesting within the survey area, all project activities shall be halted within 500 feet of the nest site and territory for the remainder of the breeding season. The USFWS and CDFW shall be notified immediately. Should development activities within this zone be required during the breeding season, than additional consultation with USFWS and CDFW shall be required to establish suitable monitoring procedures and buffers to ensure that "take" does not occur. If "take" of least Bell's vireo or southwestern willow flycatcher is necessary to complete development activities, the applicant is required to obtain the applicable regulatory take permit(s). Compensatory mitigation, if necessary, would be determined in coordination with the wildlife agencies. **BIO-1(d) Conduct Burrowing Owl Surveys.** A qualified biologist shall conduct preconstruction clearance surveys prior to ground disturbance activities within all suitable habitat to confirm the presence/absence of burrowing owls (maybe conducted concurrently with BIO-1(a)). The surveys shall be consistent with the recommended survey methodology provided by CDFW (2012). Clearance surveys shall be conducted within seven days prior to construction and ground disturbance activities. If no burrowing owls are observed, no further actions are required. If burrowing owl are detected during the preconstruction clearance surveys, avoidance buffers will be implemented in accordance with the CDFW (2012) and Burrowing Owl Consortium (1993) minimization mitigation measures. Coordination with the CDFW by a qualified biologist shall occur to establish the appropriate avoidance buffer distances specific for the project's activities and level of expected disturbance. If avoidance of burrowing owls is not feasible, a Burrowing Owl Exclusion Plan and Mitigation and Monitoring Plan will be developed by a qualified biologist in accordance with the CDFW (2012) and Burrowing Owl Consortium (1993). The Plan shall be approved by the applicable local	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	CDFW office prior to implementation. A qualified biologist shall coordinate with the CDFW to determine the appropriate exclusion methods (passive or active relocation) for the project to relocate burrowing owls to a suitable offsite location. Relocation of owls can only occur during the non-breeding season. **BIO-1(e) Provide Restoration/ Compensation for Impacts to Native Vegetation Communities.** Development activities shall avoid the loss of native scrub habitat wherever feasible. Avoidance shall be achieved through fencing of areas to be protected with a minimum 50 foot buffer. No construction activities, equipment or materials staging, or any other construction related activities shall be allowed within the protected native scrub areas or the surrounding buffers. Where avoidance is not feasible, the project applicant shall coordinate with the appropriate regulatory agencies, as necessary, regarding appropriate compensation for replacement of lost habitat. Compensatory mitigation for impacts to native vegetation would be determined in coordination with the wildlife agencies (e.g. providing onsite habitat creation through a HMMP or offsite payment into an in-lieu fee program for loss of habitat). **BIO-1(f) Exclude Invasive Species.** Final landscape design for developed areas shall be prepared by a qualified landscape architect such that project landscaping does not introduce invasive nonnative plant species into the vicinity of the project site. The plan shall be reviewed by a qualified botanist and approved by the City prior to installation of any plant materials. **BIO-1(g) Sensitive Resources Education.** Prior to initiation of all development activities, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of all listed and sensitive resource issues on site and within the project area, as well as the general measures that are being implemented to protect these resources. A fact sheet covering these issues, as well as construction BMPs, shall be prepared by the developer for distribution to all contractors,	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	their employees, and other personnel involved with construction of the project.	
Impact BIO-2 Implementation of the proposed project could result in the loss of jurisdictional waters and wetlands. Impacts would be Class II, significant but mitigable.	**BIO-2(a) Riparian/Wetland Habitat Impact Avoidance.** To the extent practicable, the project shall be designed to avoid impacts to the jurisdictional waters within the project area. The following avoidance/minimization measures are required: Any material/spoils from project activities shall be located away from jurisdictional areas or sensitive habitat and protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Only the minimal amount of material needed for the project shall be stored. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned and any contaminated materials properly disposed of. For all spills the project foreman or designated environmental representative will be notified. The extent of riparian/wetland vegetation/jurisdictional areas shall be shown on all project plans. Riparian/wetland habitat adjacent to construction areas that will not be disturbed by the project shall be demarcated with highly visible orange construction fencing installed by the construction contractor under the guidance of a qualified biologist. The fencing shall be maintained throughout the duration of the project and shall be inspected weekly to ensure it is in proper working condition. **BIO-2(b) Secure Resource Regulatory Permits for Impacts to Jurisdictional Areas.** If jurisdictional waters cannot be avoided, minimization measures shall be applied and all necessary resource agency permits shall be obtained. This includes a 401 Certification or WDR from the RWQCB and a SAA from CDFG. **BIO-2(c) Jurisdictional Habitat Mitigation.** Prepare a Habitat Mitigation and	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	Monitoring Plan (HMMP) that outlines a compensatory mitigation approach for the project in coordination with the RWQCB and CDFG. Impacts to jurisdictional waters shall be mitigated at a minimum 2:1 ratio. It is noted that the final mitigation ratio required by the RWQCB and CDFG for acquisition of regulatory permits may differ. The HMMP shall identify portions of the site (potentially along the eastern edge of the levee adjacent to the Santa Clara River) that contain suitable characteristics (e.g. hydrology) for restoration and provide adequate acreage to compensate for the anticipated project impacts. It shall provide measurable performance criteria for determining success of the mitigation effort and recommend remedial measures to ensure the performance criteria are met, if necessary. If mitigation must be implemented offsite, suitable mitigation lands shall be identified and purchased in the local vicinity of the site or watershed. The Plan shall discuss preservation of the site through a conservation easement and identify an approach for funding assurance for the long-term management of the conserved land.	
Impact BIO-3 Implementation of the proposed project could result in indirect impacts to wildlife movement through the Santa Clara River corridor. Impacts would be Class II, significant but mitigable.	**BIO-3(a) Lighting and Sound Restrictions.** New sources of lighting and glare shall comply with City standards. The project shall incorporate lighting design features to the extent possible that will reduce the amount and intensity of night lighting in open space areas adjacent to the development. This will involve using lighting only to the extent necessary, using low intensity lights, placing lighting close to the ground when possible, using shields to reduce glare and direct lighting downward, and pointing lights away from open space areas. Light from onsite sources shall not exceed 0.01 foot-candles as measured at three feet above the ground at the edge of the development. Sound amplification equipment shall be shielded from the Santa Clara River habitat to reduce effects on wildlife movement. Sound levels shall not exceed a Leq of 65 dBA as measured at the edge of the project boundary. Prior to approval of the lighting and sound plans, a qualified biologist shall review lighting and sound plans to ensure that the proposed levels minimize potential impacts on wildlife movement. Within one	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	year after completion of construction when each new development is in operation, a report shall be submitted to the City that, through light and sound level monitoring, confirms that installed equipment do not exceed the specified criteria. **BIO-3(b) Invasive Weed Prevention.** Applicants shall develop and implement an Invasive Weed Prevention and Management Program to prevent invasion of undeveloped native habitat areas by nonnative plant species. A list of target species shall be included, along with measures for early detection and eradication before any species can gain a foothold and outcompete native plant species for resources. All temporarily disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six (6) weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. **BIO-3(c) Fencing.** Fencing shall be installed along the south and eastern project boundaries adjacent to the Santa Clara River (e.g. at the east toe of the levee slope) to prevent unnecessary and unrestricted pedestrian, vehicular, bicycle, equestrian, or urban wildlife access across the levee and into the river area. **BIO-3(d) Construction Best Management Practices (BMPs).** The following BMPs shall be implemented: • Construction fencing shall be installed five (5) feet outside of the disturbance limits of active grading areas. The disturbance areas and fencing shall not encroach closer than 30 feet to sensitive habitats. • Establish appropriate BMPs along construction boundaries to provide erosion and sediment control and contain onsite. • A 15 mph speed limit shall be designated in all construction areas. • All equipment washout and fueling	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	areas shall located within the limits of grading at a minimum of 200 feet from the ephemeral drainage. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site. • Mufflers shall be used on all construction equipment and light trucks shall be in good operating condition. • Spill kits shall be onsite at all times. • Drip pans shall be placed under all stationary vehicles and mechanical equipment. • All trash that may attract predators shall be properly contained, removed from the work site weekly, and disposed of regularly. • Sensitive vegetation removed by accident during construction shall be restored. • Comply with the NPDES State General Construction Permit, the project's Storm Water Pollution Prevention Plan (SWPPP) BMPs to control the discharge of pollutants, including sediment, into local surface water drainages **BIO-3(e) Storm Drain BMPs.** To minimize the degradation of water quality which could impact sensitive fish and other aquatic resources, all future private and public storm drain facilities that would drain into the Santa Clara River shall incorporate protective BMPs for sediment and pollution control.	
Impact BIO-4 Implementation of the proposed project could result in tree removal, branch trimming, and/or ground disturbances within driplines. Impacts would be Class ~~I~~II, ~~less than~~ significant <u>but mitigable</u>.	**BIO-4 City -Tree Coordination.** Prior to initiation of future development projects, applicants shall confirm that the City of Ventura has not approved a tree protection ordinance that is applicable to any trees within the project area. Furthermore, applicants will coordinate with the City's Parks Division for project activities involving the planting, pruning, or removal of any tree located in an existing parkway or easement. Per the City's recommended tree planting requirement for specific roadways with City limits, any trees installed within the Olivas Park Drive right-of-way shall be restricted to island live oak (Quercus tomentella).	Less than significant.
Impact BIO-5 Implementation of the proposed project would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan, or other local adopted conservation plans. Impacts are Class III, less than significant.	None required.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
GREENHOUSE GAS EMISSIONS		
Impact GHG-1 The proposed project would generate short-term as well as long-term GHG emissions. Total emissions associated with the currently proposed construction and potential future development on the project site would exceed the 4.1 MT CO2E/yr per service population threshold and would incrementally contribute to climate change. Impacts would therefore be Class II, significant but mitigable.	**GHG-1 GHG Emissions Calculations.** Future project site developers shall perform project-specific GHG calculations to determine whether their proposed development would generate emissions exceeding the 4.1 metric tons of CO_2E/year per service population threshold, applicable VCAPCD threshold, or recommended City of Ventura threshold in place at the time of development. Project-specific GHG emissions calculations may be completed as stand-alone studies or may be incorporated into required CEQA analysis for individual projects. Applicants of development projects determined to exceed the appropriate threshold, as determined by the City of Ventura, shall implement one or more of the following in order to reduce GHG emissions to below the threshold of significance utilized by the City at the time of development. • **GHG Reduction Plan.** Prior to permit issuance, the applicant shall develop a GHG Reduction Plan that would reduce annual greenhouse gas emissions from the project. The plan will be implemented on site by the project applicant and may include, but is not be limited to, the following components: 1. Alternative fuel vehicles 2. Energy conservation policies 3. Energy efficient equipment, appliances, heating and cooling 4. Energy efficient lighting 5. Green building and roofs 6. Water conservation and recycling 7. Renewable energy production 8. Off-site vehicle trip reduction 9. Carbon sequestration • **Purchase Carbon Offsets.** If greenhouse gas emissions cannot be reduced to below a level of significance through compliance with a project GHG Reduction Plan, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Purchased carbon offsets shall be approved by City staff prior to permit approval.	Less than significant.
Impact GHG-2 The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Impacts would be Class III, less than significant.	None required.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
HAZARDS/HAZARDOUS MATERIALS		
Impact HAZ-1 Within the proposed roadway extension and levee alignment on the project site, demolition of existing structures and soil disturbance during construction could release pesticides, TPH, and lead at levels that pose health risks. Impacts to the release of hazardous materials within the roadway alignment would be Class II, significant but mitigable.	**HAZ-1 Soil Management Plan.** In the area of the proposed Olivas Park Drive extension and levee alignment, a Soil Management Plan shall be prepared prior to grading to provide procedures for characterization, handling, storage, disposal, and documentation of all soils to be excavated during construction activities. This plan will describe the approach for managing soils consistent with all laws and regulations regarding the excavation, handling, and disposal of impacted soils, including Ventura County Air Pollution Control District (VCAPCD) Rule 55 (Fugitive Dust) and VCAPCD Rule 74.29 (Soil Decontamination Operations) (if applicable). The plan shall be approved by the Los Angeles Regional Water Quality Control Board prior to the issuance of a demolition permit. At the MP Enterprises site (Parcel 13), where lead has been detected in soil samples, the Soil Management Plan shall require additional sampling and analysis for this metal prior to the removal of soil. Any soils that contain lead at levels exceeding the Soluble Threshold Limit Concentration (STLC) shall be excavated and disposed as a hazardous waste. Soils in Parcel 13 that have been identified as containing TPH at levels exceeding RWQCB action levels shall also be excavated and disposed as a hazardous waste. Upon removal of the concrete pad in Parcel 13, the underlying soil shall be tested for TPH and treated as a hazardous waste if contamination is detected. In the four locations where Toxaphene contamination has been detected, soils shall be excavated and disposed as a hazardous waste. Contaminated soil will either be stockpiled on-site or will be loaded directly onto trucks and covered and transported to an approved off-site disposal/recycling facility. If contaminated soil is stored on-site, it shall be stockpiled on polyethylene or placed in containers approved by the federal Department of Transportation (DOT) until it is transported to an approved off-site disposal/recycling facility. Disposal of contaminated soils shall occur at an appropriate facility licensed to handle such contaminants and remedial excavation shall proceed under the supervision of an	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	environmental consultant licensed to oversee such remediation. The remediation/disposal program shall be approved by VCEHD. The proponent shall submit all correspondence to VCEHD prior to issuance of grading permits. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation/disposal, a qualified environmental consultant shall prepare a report summarizing the project, the remediation/disposal approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.	
Impact HAZ-2 Future development facilitated by the proposed General Plan amendments and zoning changes in the project site could result in the release or use of hazardous materials. Impacts would be Class II, significant but mitigable.	**HAZ-2 Site-Specific Analysis and Remediation.** Prior to construction of any commercial and/or industrial development within the project area, the developer shall undertake site-specific analysis of potential soil and groundwater contamination. If soil sampling indicates the presence of any contaminant in quantities not in compliance with applicable laws or regulations, the applicant shall coordinate with VCEHD or RWQCB, as appropriate, to develop and implement a program to remediate or manage the contaminated soil or groundwater. If groundwater is determined to have been affected by on-site contamination, or if soil contamination is detected at depths of 20 feet below grade or greater, then a groundwater sampling assessment shall be performed. If contaminants are detected in groundwater at levels that exceed maximum contaminant levels for those constituents in drinking water, then the results of the groundwater sampling shall be forwarded to the appropriate regulatory agency (VCEHD, RWQCB, or the State of California Environmental Protection Agency Department of Toxic Substances Control). The agency shall review the data and sign off on the property or determine if any additional investigation or remedial activities are deemed necessary. If contaminated soil is present, disposal of contaminated soils shall occur at an appropriate facility licensed to handle such contaminants and remedial excavation shall proceed under the supervision of an environmental consultant licensed to oversee such remediation. The remediation/disposal program shall be	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	approved by VCEHD. The applicant shall submit all correspondence to VCEHD prior to issuance of grading permits. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation/disposal, a qualified environmental consultant shall prepare a report summarizing the project, the remediation/disposal approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.	
Impact HAZ-3 There are five listed LUST sites within the project area and thirteen sites within one-half mile of the project site. Due to the case closed status of these sites, impacts from listed environmental sites would be Class III, less than significant.	None required.	Less than significant.
Impact HAZ-4 The MCSD wastewater treatment facility contains soil contamination in the vicinity of an above-ground storage tank for diesel fuel. Impacts from diesel contamination would be Class II, significant but mitigable.	**HAZ-4 Storage Tank Removal.** Prior to construction of the Olivas Park Drive extension, the diesel AST in Parcel 12 shall be removed and properly disposed at a licensed facility. The removal of the storage tank shall be conducted in accordance with VCEHD regulations. Once the tank is removed, the underlying soil shall be inspected by a qualified environmental consultant to determine if soil and/or groundwater sampling beneath the storage tank would be necessary. If contaminated soil is identified and contaminants in concentrations exceeding regulatory thresholds or action levels are detected, a remediation program shall be implemented to reduce contaminants to within acceptable levels as determined by the VCEHD. Remediation options may include, but are not limited to: excavation and removal with offsite disposal or in-situ soil treatment. If contaminated groundwater is identified and contaminants in concentrations exceeding regulatory action levels are detected, a remediation program shall be implemented to reduce contaminants to within acceptable levels as determined by the VCEHD. Remediation options may include, but are not limited to: pumping and treatment, biological remediation, or natural attenuation.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
HYDROLOGY and WATER QUALITY		
Impact HWQ-1 Construction and operation of the proposed project would comply with existing regulations regarding water quality standards and waste discharge requirements. Impacts would be Class III, less than significant.	None required.	Less than significant.
Impact HWQ-2 The proposed project would increase impervious surfaces within the project site, which could affect groundwater recharge in the project area. However, all new development facilitated by the proposed project would be required to implement LID techniques, which would increase percolation rates on-site. Impacts to water recharge would be Class III, less than significant.	None required.	Less than significant.
Impact HWQ-3 The proposed project would alter the drainage pattern of the project area ~~by constructing~~through construction of a levee along the northern bank of the Santa Clara River. Levee construction would increase water surface elevations and flow velocities in the Santa Clara River, as well as cause changes to the top width of the river. Changes to the floodplain and foodway would ~~improve~~ reduce risks associated with floods on the project site, but ~~w~~ could place ~~19 acres of~~ land on the south overbank in Oxnard within the 100-year floodplain. Impacts would be Class II, significant but mitigable.	**HWQ-3(a) Erosion Evaluation and Reinforcement.** Once the design of the levee has been finalized, stream flow velocity calculations shall be performed by a qualified hydrologist to determine the exact increase near the radio tower and building. If the increase is determined to result in erosion of the fill underlying the building and tower, the structures must be reinforced using rip-rap, soil cement, or similar technique to prevent erosion. **HWQ-3(b) Project Timing.** Adequate flood protection shall be provided for both the project area and potentially affected areas along the south side of the Santa Clara River in the City of Oxnard prior to project area construction other than the extension of Olivas Park Drive~~roadway and levee~~. Construction of the north and south levees shall be coordinated to the extent feasible to ensure that neither the project site nor any developed areas in Oxnard would experience an increase in surface water elevation of more than one foot during a 100-year flood event~~the area of the floodplain in the south overbank area would not be increased as a result of the proposed project~~.	Less than significant.
Impact HWQ-4 Construction of the levee would impede runoff from the project area from discharging into the Santa Clara River, which would burden the existing drainage system. However, the proposed project would include the installation of new storm drains and drainage features to facilitate the discharge of stormwater from the project area. Therefore, impacts to the capacity	None required.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
of the existing storm drain system would be Class III, less than significant.		
Impact HWQ-5 The proposed project would include the construction of a levee, which would reduce the floodway and floodplain in the project area to protect new and existing structures. Proper engineering would reduce the risk of damage to development in the project area resulting from levee failure. However, because the proposed project would place structures in an area currently designated as a FEMA flood hazard zone, impacts would be Class II, significant but mitigable.	**HWQ-5(a) Conditional Letter of Map Revision (CLOMR).** Prior to construction of the levee, a CLOMR from FEMA must be obtained to ensure that project design will accommodate flows during the 100-year storm event. **HWQ-5(b) 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.
Impact HWQ-6 The project site is not located in an area that would be subject to tsunami, seiche, or mudflow. There would be no impact in this regard (Class IV).	None required.	Less than significant.
LAND USE AND PLANNING		
Impact LU-1 The proposed project would involve various amendments to the City of Ventura 2005 General Plan and Zoning Map. However, these proposed amendments would not create inconsistencies with any General Plan policies adopted for purposes of avoiding or mitigating an environmental impact. This is a Class III, less than significant impact.	None required.	Less than significant.
Impact LU-2 The proposed project would involve the re-designation of about ~~31.4~~56.8 acres of land currently designated Agriculture and subject to the City's SOAR Ordinance to non-agricultural land use designations. However, the necessary findings to allow the City Council to redesignate these lands to a non-agricultural designation can be made. Therefore, this is a Class III, less than significant, impact.	None required.	Less than significant.
Impact LU-3 The proposed project would involve a boundary reorganization with annexation of the MCSD parcel 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 required.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
TRAFFIC AND CIRCULATION		
Impact T-1 Development facilitated by the proposed project would increase traffic levels on the local circulation system. Two of the ten intersections in the study area would operate at levels of service that exceed their performance standards. ~~M~~However, mitigation is available for both intersections~~; however, because needed mitigation at the U.S. 101 Southbound Ramps/Johnson Drive interchange may not be desirable, the impact at that location is considered~~ so impacts would be Class I~~I~~, significant~~, and unavoidable~~but mitigable.	**T-1(a) Dual Left-turn Lanes at Victoria Avenue/Olivas Park Drive Intersection.** On the westbound approach of this intersection, dual left-turn lanes shall be installed to improve traffic conditions to LOS B and D during the A.M. and P.M. peak hour periods respectively. The timing of this improvement will be dependent on traffic volume growth at the intersection, as determined through monitoring by the City. For the U.S. 101 Southbound Ramps/ Johnson Drive interchange, the following mitigation measure would be required: **T-1(b) Future Development Monitoring.** Monitor ~~the operation of the~~traffic at the U.S. 101 Southbound Ramps/Johnson Drive intersection annually ~~and implement trip generation restrictions (when~~to determine whether the threshold of ICU – 0.95 ~~is~~ has been reached~~)~~ such that the City's LOS E threshold is ~~not~~ exceeded. ~~The trip generation restrictions will be linked to the issuance of building permits.~~ ~~In addition to Mitigation Measure T-1(b), when~~ If the threshold of ICU – 0.95 is reached, ~~one of the following~~either ~~mitigation~~ Mitigation ~~m~~Measure T-1(c), T-1(d), or T-1(e) ~~could~~ shall be implemented: **T-1(c) Eliminate Left-turns.** Left-turns to the southbound ramp at the U.S. Highway 101 Southbound Ramps/Johnson Drive intersection shall be eliminated and a second northbound through travel lane shall be provided from Auto Center Drive to North Bank Drive. In addition, an exclusive right-turn lane on the northbound approach of the Victoria Avenue/Valentine Road intersection shall be required. Johnson Drive shall be re-striped to provide two northbound through lanes under U.S. Highway 101 and a traffic signal shall be installed at the Motel 6/Johnson Drive intersection. Caltrans approval of the~~se~~ improvements to the U.S. Highway 101 Southbound Ramps/Johnson Drive would be required. **OR** **T-1(d) P.M. Peak Hour Only Restriction of Left-turns.** Left-turns shall be restricted to the southbound ramp at the intersection during the P.M. peak hour period only. Left-	Less than significant~~ if the mitigation measures are implemented. Significant and unavoidable at the U.S. 101 Southbound Ramps/Johnson Drive interchange if it is determined that neither Measure T-2 nor Measure T-3 is feasible or desirable~~.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
	turns shall be allowed during the remainder of the day. This would cause vehicles to divert to the U.S. Highway 101 southbound ramps at Victoria Avenue or make U-turns at the Johnson Drive/Motel 6 Driveway intersection to access southbound U.S. Highway 101 only during the P.M. peak hour between 4:00 P.M. and 6:00 P.M. An exclusive right-turn lane on the northbound approach of the Victoria Avenue/Valentine Road intersection and installation of a traffic signal at the Motel 6/Johnson Drive intersection would be required as part of this ~~alternative~~measure. Johnson Drive shall be re-striped to provide two northbound through lanes under U.S. Highway 101. Caltrans approval of the improvements to the U.S. Highway 101 Southbound Ramps/Johnson Drive intersection would be required. OR **T-1(e) Limit Future Development.** Trip generation restrictions shall be required of future development in the project area, and shall be implemented as a condition of building permit issuance, to prevent an exceedance of the City's LOS E threshold at the Johnson Drive and Highway 101 Southbound Ramps intersection.	
Impact T-2 Traffic volumes on roadway segments at buildout of the proposed project would not exceed County thresholds for freeways, state highways, and county roads. Impacts related to roadway segments would be Class III, less than significant.	None required.	Less than significant.
Impact T-3 Through compliance with the City's level of service standards, roadways and intersections in the County's CMP network would be consistent with the CMP LOS E standard. Impacts related to the CMP network would be Class III, less than significant.	None required.	Less than significant.
Impact T-4 With adherence to applicable City codes and regulations, development facilitated by the proposed project would not increase traffic-related hazards due to a design feature or incompatible uses or result in inadequate emergency access. Impacts related to traffic-related hazards and emergency access would be Class III, less than significant.	None required.	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measures	Significance After Mitigation
Impact T-5 Development facilitated by the proposed project would be consistent with adopted policies, plans, or programs supporting alternative transportation. Impacts relating to alternative transportation would be Class III, less than significant.	None required.	Less than significant.
UTILITIES AND SERVICE SYSTEMS		
Impact U-1 Water demand generated by the proposed project would not substantially deplete groundwater resources, as there is sufficient water supply to serve the proposed project. Impacts to water supply would be Class III, less than significant.	None required, although project area developers would be required to comply with the following General Plan actions: • Approve new projects contingent upon an adequate supply of water. • Require low flow fixtures, leak repair, and drought tolerant landscaping (native species if possible), plus emerging water conservation techniques, such as reclamation, as they become available. • Require project proponents to conduct evaluations of the existing water distribution system, pump station, and storage requirements for the proposed development in order to determine if there are any system deficiencies or needed improvements for the proposed development. • Require new projects to dedicate water rights and pay an “in lieu” fee.	Less than significant.
Impact U-2 The City of Ventura Water Reclamation Facility would have sufficient capacity to serve project area development, as well as the additional wastewater that would be transferred from the abandoned MCSD wastewater treatment facility. Impacts to wastewater treatment, capacity, and facilities would be Class III, less than significant.	None required.	Less than significant.

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1.0 INTRODUCTION

This document is a ~~Draft~~ Final Environmental Impact Report (EIR) that evaluates the proposed Olivas Park Drive Extension Project located in the City of Ventura, California. This Final EIR includes responses to written comments that the City of Ventura received on the Draft EIR that was circulated for public review from August 9, 2013 to September 23, 2013. Changes to the EIR text resulting from those responses as well as other editorial corrections initiated by City staff (other than minor typographical corrections) are shown in underline/strikeout format.

The proposed project involves: (1) the extension of Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive; (2) a levee/floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River and terminates 350 feet south of the Southern Pacific Railroad; (3) General Plan amendments for land use changes for parcels within the ~~111.8~~139-acre project boundary and reclassification of the Olivas Park Drive roadway extension; (4) a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan; (5) zone changes for parcels within the project boundaries. Additionally, the Montalvo Community Services District (MCSD) would abandon and remove the existing wastewater treatment plant components of the MCSD, and the wastewater treated at this facility would be diverted to the City's wastewater facility

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 the California Environmental Quality Act (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 also considers the long-term development of land use designation changes for and re-zoning of a number of individual properties for which no specific development proposal is currently contemplated. In this way, the EIR ensures consideration of cumulative impacts that might be slighted in a case-by-case analysis and allows the City to consider programmatic mitigation measures.

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.

1.2 EIR SCOPE AND CONTENT

In accordance with the CEQA *Guidelines*, the City of Ventura prepared an Initial Study for the project and distributed a Notice of Preparation (NOP) to affected agencies and the public for the required 30-day period on December 12, 2010. The City received five letters responses to the NOP. Because of several changes to the originally contemplated project, the City distributed a revised NOP on December 21, 2012 and received five responses. Table 1-1 summarizes the issues relevant to the EIR that were identified in the NOP responses received and where in this EIR the issues raised are addressed. The NOP, Initial Study, and NOP comment letters received are included in Appendix A.

Table 1-1
NOP Response Issues

Issue	EIR Section
Railroad Safety	Land Use
Air Emissions (construction & operation)	Air Quality
CO Screening	Air Quality
Greenhouse Gas Emissions	Air Quality
Biological Resources	Biological Resources
Endangered Plant and Animal Species	Biological Resources
Floodplain and Floodway impacts	Hydrology and Water Resources
Water Quality	Hydrology and Water Resources
Local and regional traffic and transportation impacts; sidewalks; TIMF	Traffic and Circulation
Creation of County Islands	Land Use
Local and regional traffic and transportation impacts; sidewalks; TIMF	Transportation and Circulation
Ventura Local Agency Formation Commission Approval and Annexation	Project Description
Ventura County Watershed Protection District Approval	Project Description

The City held an EIR scoping meeting on January 18, 2011 in order to solicit comments from the public on the proposed project. Four individuals attended. No written or verbal comments were provided.

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 the following:

Aesthetics
Agricultural Resources
Air Quality/Greenhouse Gas Emissions
Biological Resources
Hazards and Hazardous Materials
Hydrology and Water Quality
Land Use and Planning
Transportation/Traffic
Utilities and Service Systems

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 three 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. Specifically, the *CEQA 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 storm drain connections to the Santa Clara River. The California Department of Transportation (Caltrans) may also be a responsible agency, as permits may be required from Caltrans for work associated with the Johnson Drive southbound off-ramp from U.S Highway 101. Finally, the Ventura County Local Agency Formation Commission (LAFCo) is a responsible agency because the LAFCo holds approval authority over several changes of organization that are proposed, including a sphere of influence amendment to include the Montalvo Community Services District (MCSD) parcel, annexation of the same territory to the City, and detachment of the same territory from the Ventura County Resource Conservation District, the Ventura County Fire Protection District, and County Service Areas 32 and 33.

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 Wildlife (CDFW) is a trustee agency for the project and has authority over wetland and riparian resources within the project area. The CDFW will be responsible for issuing a streambed alteration agreement for the project. The Los Angeles Regional Water Quality Control Board (RWQCB) is responsible for maintaining the quality of waters of the state. The RWQCB would be responsible for issuing a Waste Discharge Requirement (WDR) for certain components of the project.

The U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and National Marine Fisheries Service are ~~is~~ not ~~a~~ responsible or trustee agencies~~y~~ for the project since ~~it is a~~they are federal agencies~~y~~; however, the Corps of Engineers has authority over the placement of fill materials in a river channel and will be responsible for issuing a 404 permit for the levee component of the project, while the Fish and Wildlife Service and National Marine Fisheries Service are responsible for protection of species that could be affected ~~be~~by aspects of the project.

1.4 ENVIRONMENTAL REVIEW PROCESS

The environmental review process, as required under CEQA, is presented below.

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 Project 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).

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)].

2.0 PROJECT DESCRIPTION

The proposed project involves: (1) the extension of Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive; (2) a levee/floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River and terminates 350 feet south of the Southern Pacific Railroad; (3) General Plan amendments for land use changes for parcels within the ~~111.8~~139-acre project area and reclassification of the Olivas Park Drive roadway extension; (4) a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan; and (5) zone changes for parcels within the project boundaries. The project also includes a pre-zone and annexation of one County parcel. The proposed zoning changes and land use amendments could accommodate a maximum of about 1,258,000 square feet of commercial development and 75,000 square feet of industrial development. The proposed road extension would transition to join the existing improvements at the Johnson Drive/U.S. 101 southbound ramps interchange. Additionally, the Montalvo Community Services District (MCSD) would abandon and remove the existing wastewater treatment plant components of the MCSD, and the wastewater treated at this facility would be diverted to the City's wastewater facility. ~~No improvements other than the transition are proposed as part of this project at the Johnson Drive/U.S. 101 interchange.~~

This section describes the project location, characteristics of the site and the proposed development, project objectives, and the approvals needed to implement the project.

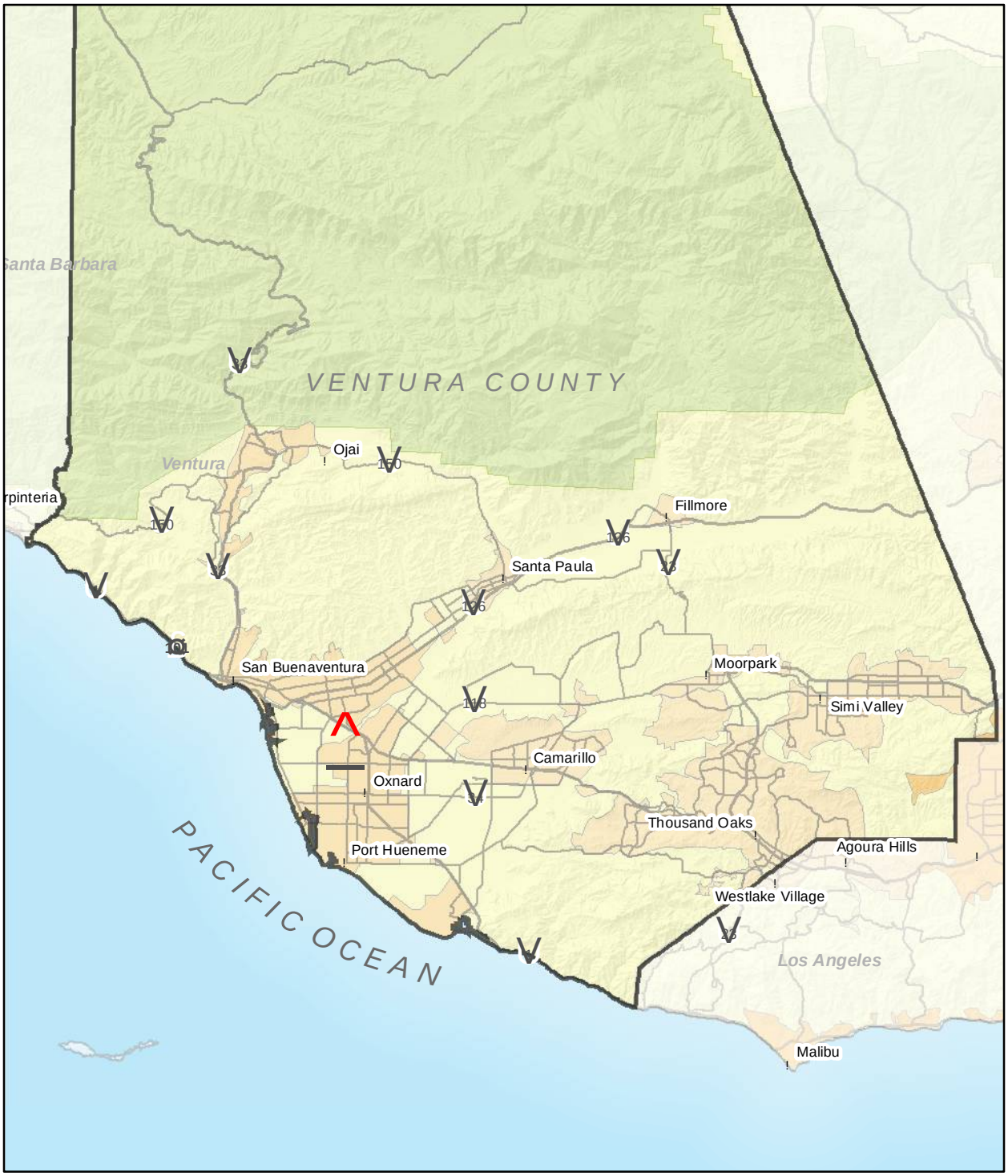
2.1 PROJECT PROPONENT

City of Ventura
501 Poli Street
Ventura, California 93002-0099

2.2 PROJECT LOCATION

The project site is located between Golf Course Drive and Johnson Drive, primarily in the City of Ventura. Portions of the road alignment and levee are in unincorporated Ventura County. The irregular shaped project site includes 14 parcels. Figure 2-1 shows the project site within Ventura County. Figure 2-2a shows the physical components of the project within their local context~~, while~~. Figure 2-2b shows the details of the proposed Olivas Park Drive extension at Auto Center Drive/Johnson Drive. Figure 2-2c shows details of the eastern portion of the proposed levee/floodwall system, and Figure 2-2d shows the proposed outlet for Moon Ditch.

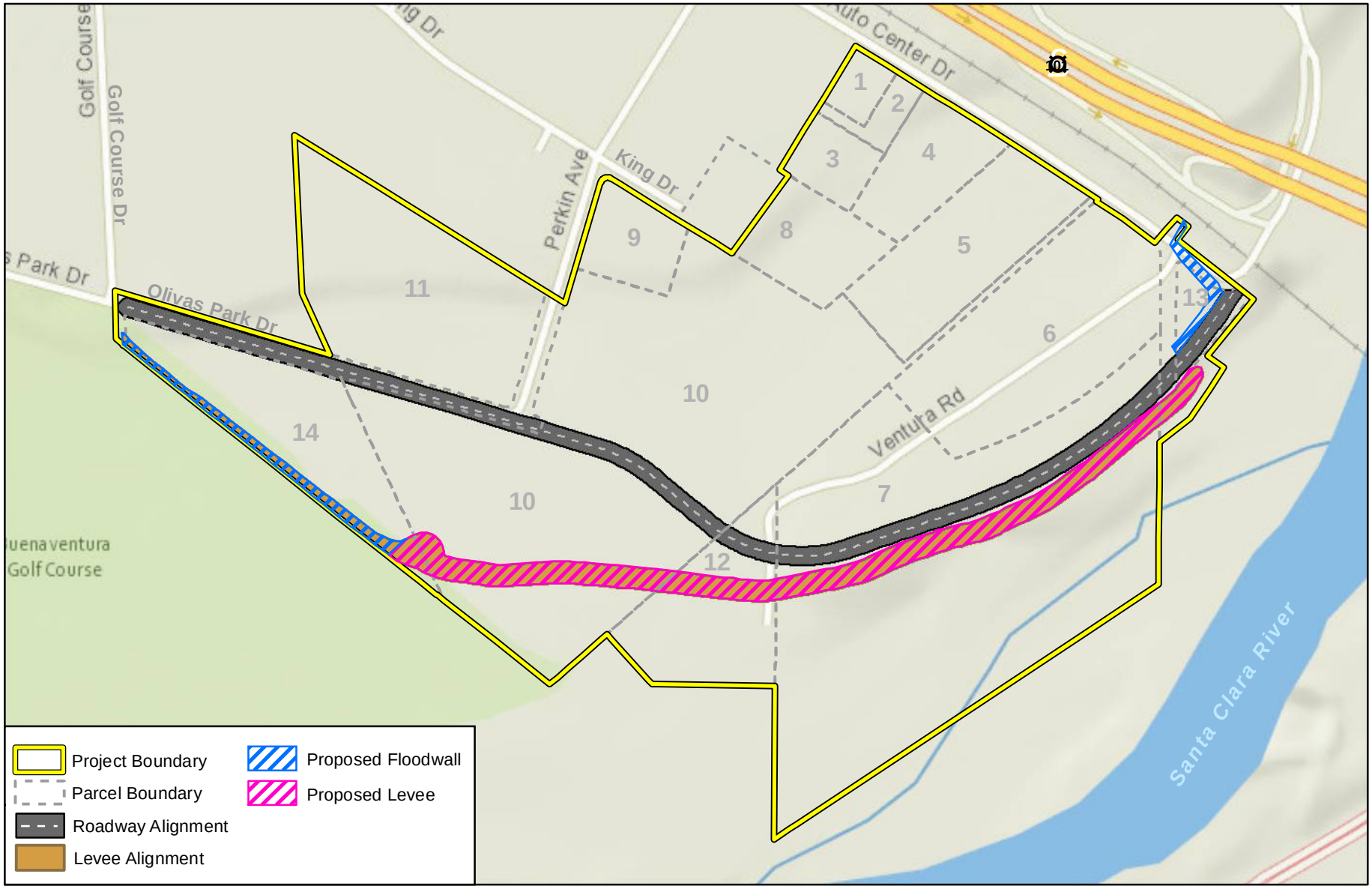
The proposed Olivas Park Drive extension would connect Johnson Drive near U.S. Highway 101 to the existing terminus of Olivas Park Drive at Perkin Avenue. The road extension would encroach onto properties owned by the Hofer family, Ventura Olivas Company LLC, and the Montalvo Community Services District (MCSD). The proposed levee/floodwall would generally parallel the proposed road extension, and would be located primarily between the roadway extension and the Santa Clara River. The levee/floodwall design is discussed further in Section 2.4.2, *Santa Clara River Levee*. The ~~111.8-acre project~~ area for which General Plan amendments and zone changes are proposed is located north of the proposed levee. The



Basemap Source: ESRI Data, 2009, and USGS/CDFG, 2002.

Regional Location

Figure 2-1

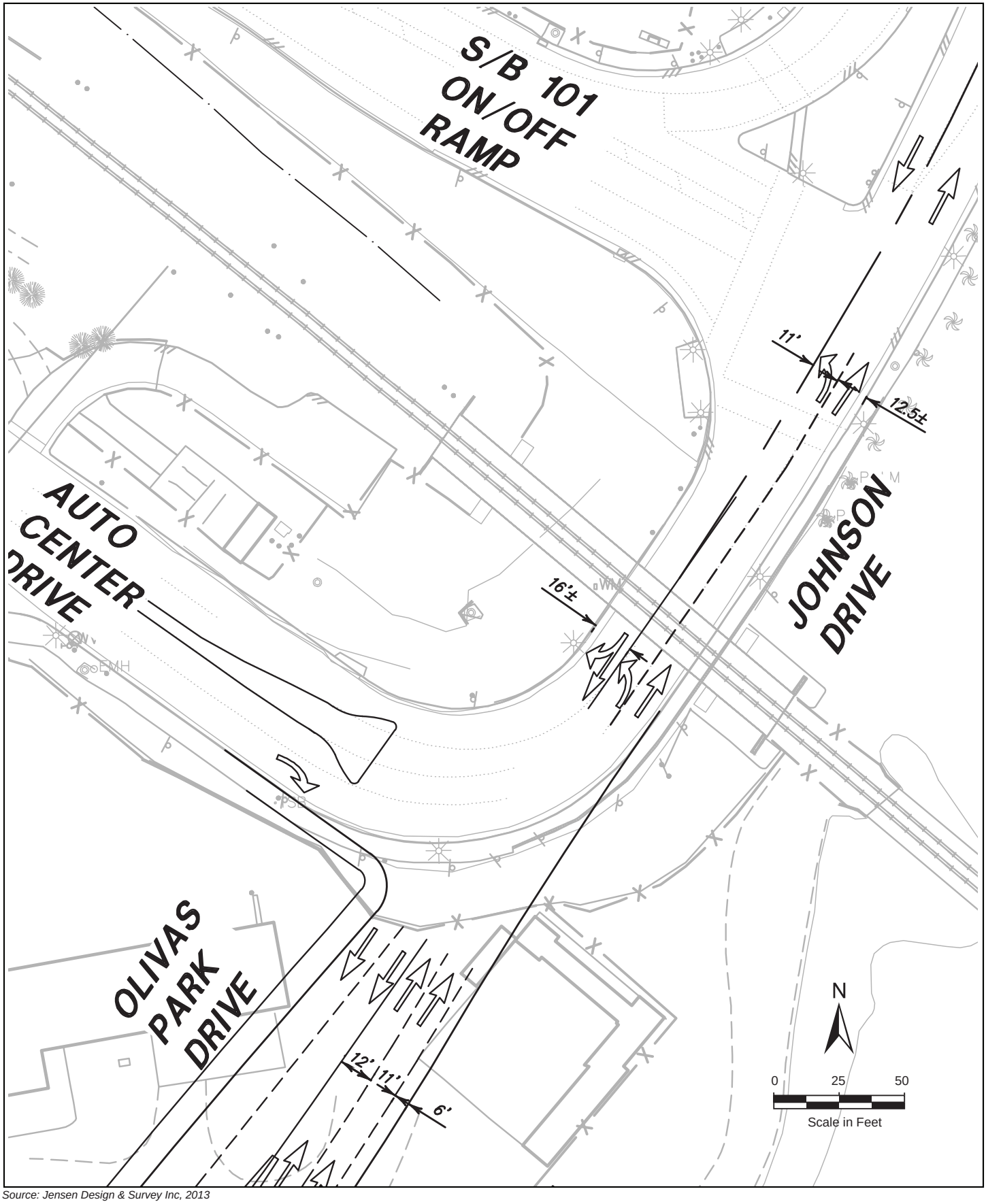


Basemap Credits: Sources: Esri, DeLorme, HERE, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

Physical Project Components

0 330 660 Feet

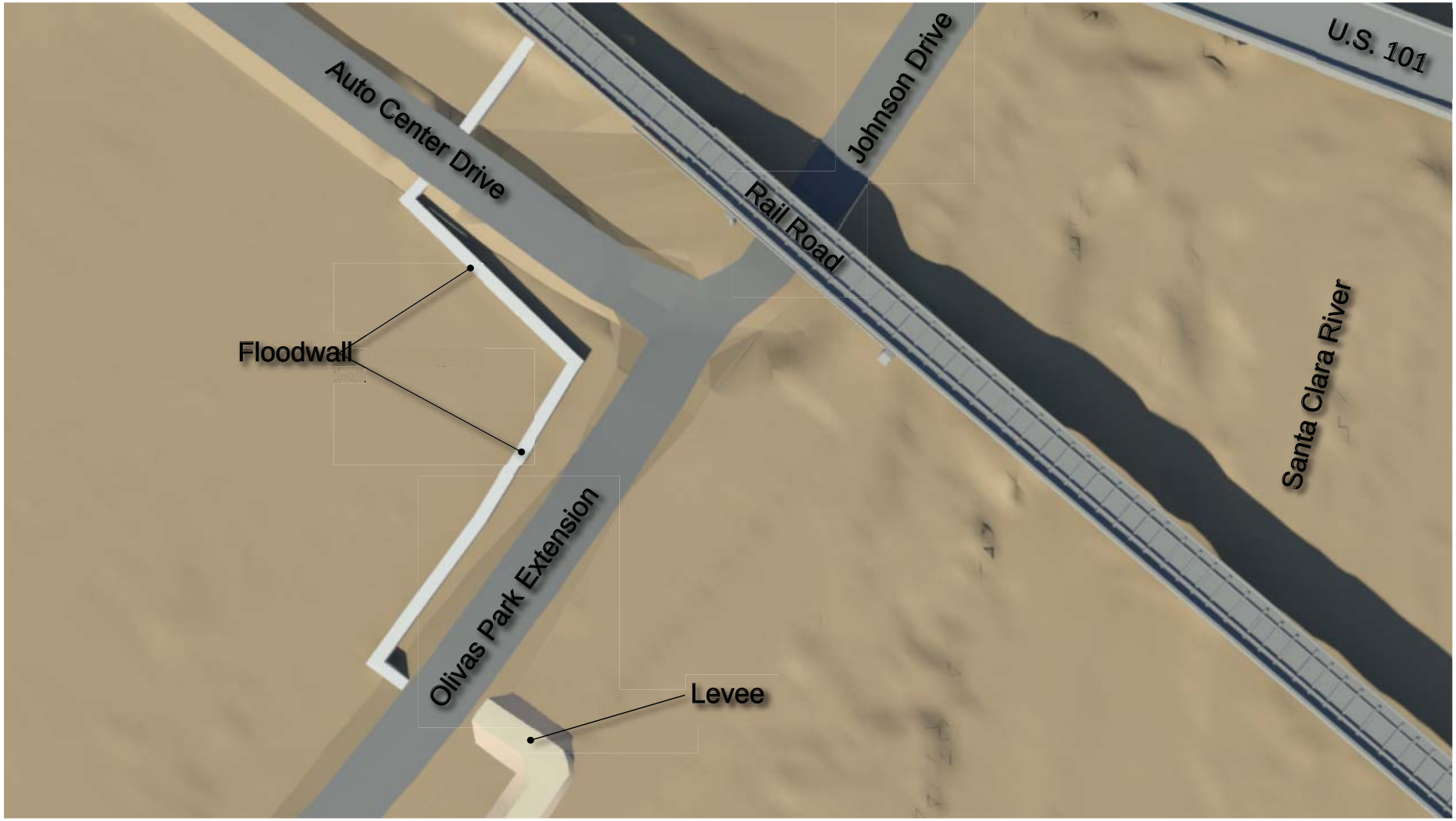
Figure 2-2a



Source: Jensen Design & Survey Inc, 2013

Olivas Park Drive Extension Lane Transition

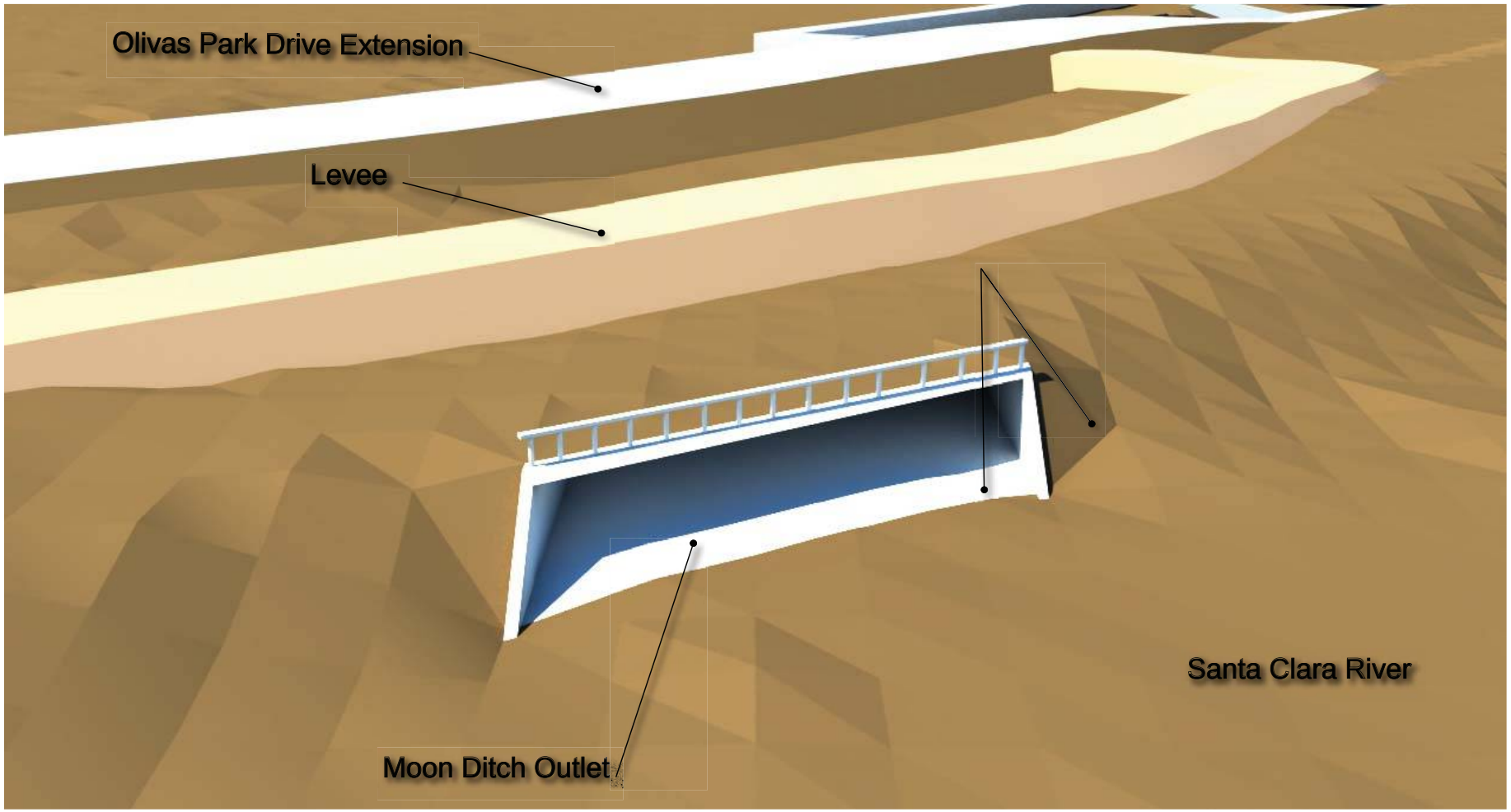
Figure 2-2b



Olivas Park Drive & Floodwall
Eastern Portion Detail

Figure 2-2c

Source: Hawks & Associates.



Proposed Moon Ditch Outlet

Figure 2-2d

Source: Hawks & Associates.

proposed project would also involve the construction of ancillary infrastructure improvements, including: water mains; sewer lines; reclaimed water lines; storm drainage facilities; and electrical and natural gas lines. In conjunction with construction of the roadway extension, a Class II bike path would also be located along both sides of the proposed roadway extension.

2.3 CURRENT SITE CHARACTERISTICS

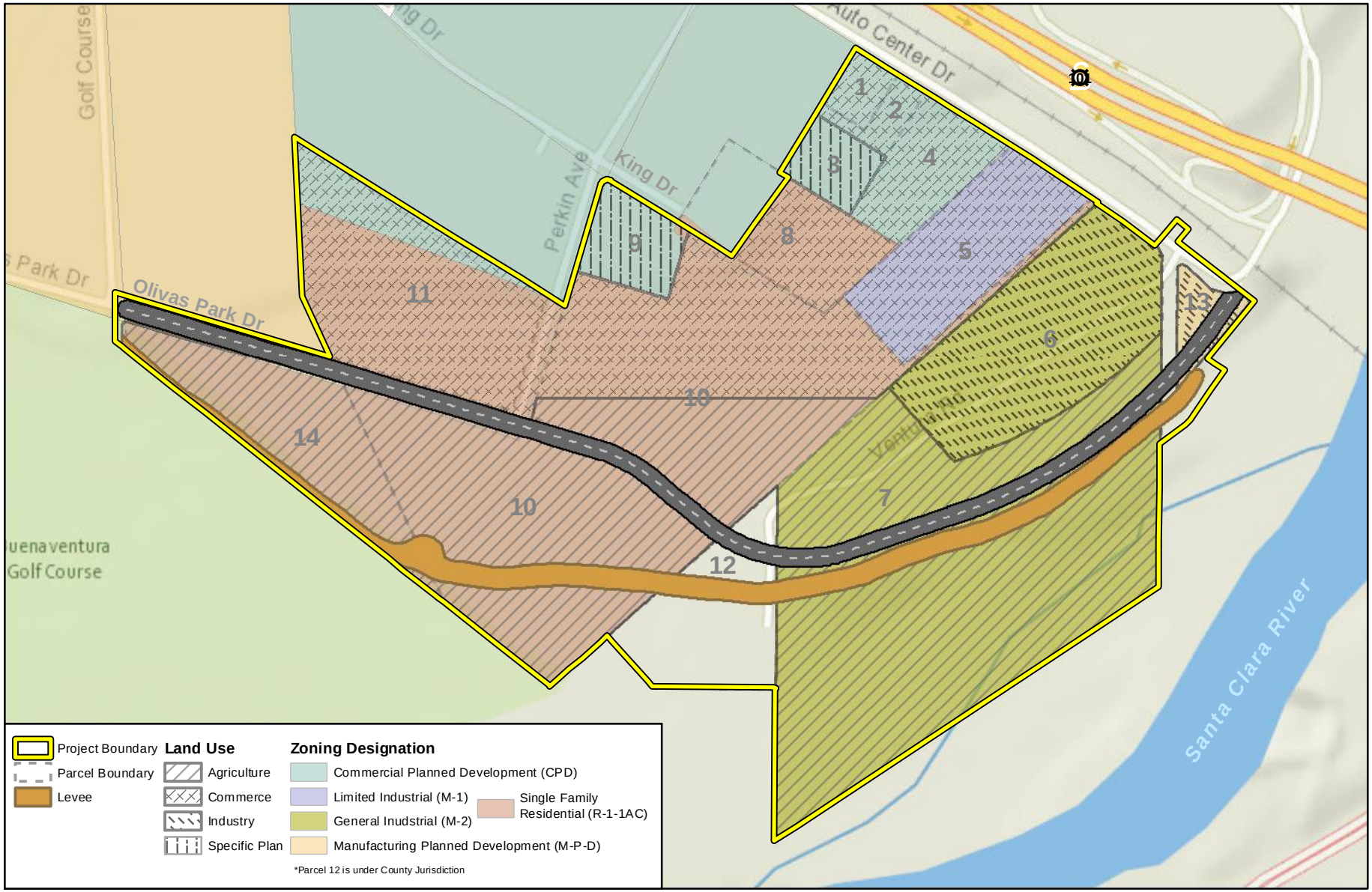
Table 2-1 summarizes the existing characteristics of the project site. A description of the key site characteristics follows.

Table 2-1
Existing Site Characteristics

General Plan Land Use Designations	Agriculture Commerce Specific Plan Industry Open Space (County)
Zoning	Single Family (R-1-1AC) Commercial Planned Development (CPD) Manufacturing Planned Development (M-P-D) Limited Industrial (M-1) General Industrial (M-2) OS-80 (County)
Current Land Use and Development	The project site includes 8 parcels that are currently developed in whole or in part with such uses as auto sales and related uses, a gaming club, recreational vehicle sales, vehicle/truck storage. The Montalvo Community Services District wastewater treatment facility occupies one project site parcel. Part of 1 of the parcels is currently used for row crop production, and the remainder of the 14 parcels are currently vacant, undeveloped land. Surrounding uses include auto sales to the north, commercial uses to the northwest, and a golf course to the southwest. Auto Center Drive, the Southern Pacific Railroad, and the U.S. 101 are to the north of the project site, and the Santa Clara River lies to the south and east.

The ~~111.8~~139-acre project area currently has ~~four~~ four City General Plan land use designations: Commerce (~~29.4~~43.67 acres); Agriculture (~~64.33~~77.2 acres); Industry (13.48 acres); and Specific Plan (4.59 acres). In addition to the City Agriculture General Plan designation, the 6.65-acre Parcel 12 (the MCSD parcel) currently has a County General Plan designation of Open Space. ~~Six~~ Five City zoning classifications currently apply to the site: Single-Family Residential, R-1-1AC (63.69~~60.63~~ acres); General Industrial, M2 (~~28.66~~49.27 acres); Commercial Planned Development, CPD (10.53 acres); Limited Industrial, M1 (7.31 acres); and Manufacturing Planned Development, MPD (1.49 acres)~~; and Agriculture (3.18 acres)~~. Parcel 12 currently has a County zoning classification of OS-80.

Figure 2-3 shows the current land use and zoning designations.



Basemap Credits: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Other data from County of Ventura, 2010

Current Land Use and Zoning Designations

0 330 660 Feet

Figure 2-3

2.4 PROJECT CHARACTERISTICS

As noted above, the proposed project would involve: (1) the extension of Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive; (2) a levee / floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River and terminates 350 feet south of the Southern Pacific Railroad; (3) General Plan amendments for land use changes for parcels within the ~~111.8~~139-acre project area and reclassification of the Olivas Park Drive roadway extension; (4) a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan; and (5) zone changes for parcels within the project boundaries. Each of these components is described below.

2.4.1 Olivas Park Drive Extension

The Olivas Park Drive extension would involve an approximately 5,750 linear foot roadway connecting Olivas Park Drive near Golf Course Drive to Johnson Drive at the Johnson Drive / Auto Center Drive intersection. This segment of Olivas Park Drive would have a cross-section that varies between 82 feet and 88 feet, and includes two 11-foot travel lanes, two 12-foot travel lanes, a 14-foot median, and two 6-foot bike lanes. Between Golf Course Drive and Perkin Avenue, Olivas Park Drive would have 8-foot sidewalks on both sides of the street. East of Perkin Avenue, Olivas Park Drive would have a 10-foot sidewalk on the north side and no sidewalk amenities on the south side. The new sidewalk at Olivas Park Drive would tie in with the existing sidewalk at Auto Center Drive. The proposed roadway extension would also include a new storm drain connection to the Santa Clara River.

2.4.2 Santa Clara River Levee

The proposed project would include the construction of a levee / floodwall that would be located along the southern and eastern boundaries of the project site. The proposed levee design would vary in height from 5 feet up to 13 feet above ground, and would include a 17-foot wide roadway along the top of the levee for use by maintenance vehicles ~~as well as a Class I bike path~~. The levee bank and toe protection adjacent to the Santa Clara River would primarily consist of rock riprap and vegetated slopes that conform to U.S. Army Corps of Engineers standards, but would vary in size and depth depending on the calculated design flow velocities. The floodwall would be constructed of concrete and masonry. The proposed levee / floodwall would be approximately 5,400 feet in length, and would extend from the intersection of Golf Course Drive and Olivas Park Drive along the northeastern boundary of the Buenaventura Golf Course and the northwestern bank of the Santa Clara River (refer to Figures 2-2a through 2-2d). A floodwall design would be used for the easternmost 600 feet of the flood protection facility, transitioning to a levee with a vegetated slope (1,000 linear feet), then to a levee with rock riprap on the face adjacent to the Santa Clara River (3,200 linear feet), and terminating with a floodwall~~y~~ (450 linear feet) along the north side of the roadway extension and terminating at a point just west of the intersection of Auto Center Drive and Johnson Drive. For the eastern portion of the floodwall ~~portion of the facility~~ (see Figure 2-2c), the proposed roadway extension would be elevated and cross over the top of the levee and descend to connect with Johnson Drive. At this location, the roadway would effectively serve as the levee for approximately 100 linear feet.

The levee would be constructed above the river and would not affect the floodway or channel of the river. An outlet for Moon Ditch, an existing Ventura County Watershed Protection District drainage channel, would be provided in the eastern portion of the levee (see Figure 2-2d). The levee would provide flood protection from a 100-year flood for properties north of the levee. The 19 acres south of the proposed levee and within the project boundaries would be designated as Open Space. The Open Space area would be available for dedication for conservation purposes.

The City of Oxnard is also contemplating improvements to and extension~~construction~~ of a levee on the south side of the Santa Clara River. The~~is~~ existing levee is about 1.6 miles in length and a 0.5-mile extension is being contemplated. With this extension, the levee would be approximately 2.1 miles in length and would extend southwest from the U.S. Highway 101 overpass to near the South Victoria Avenue overpass. The existing levee also needs to be improved to meet FEMA certification requirements. Although not part of the proposed project, the design of these~~is~~ levee improvements would be coordinated with the proposed levee on the Ventura side of the Santa Clara River. The environmental review considers potential hydrological impacts of the proposed Ventura levee both with and without the levee improvements being contemplated by the City of Oxnard.

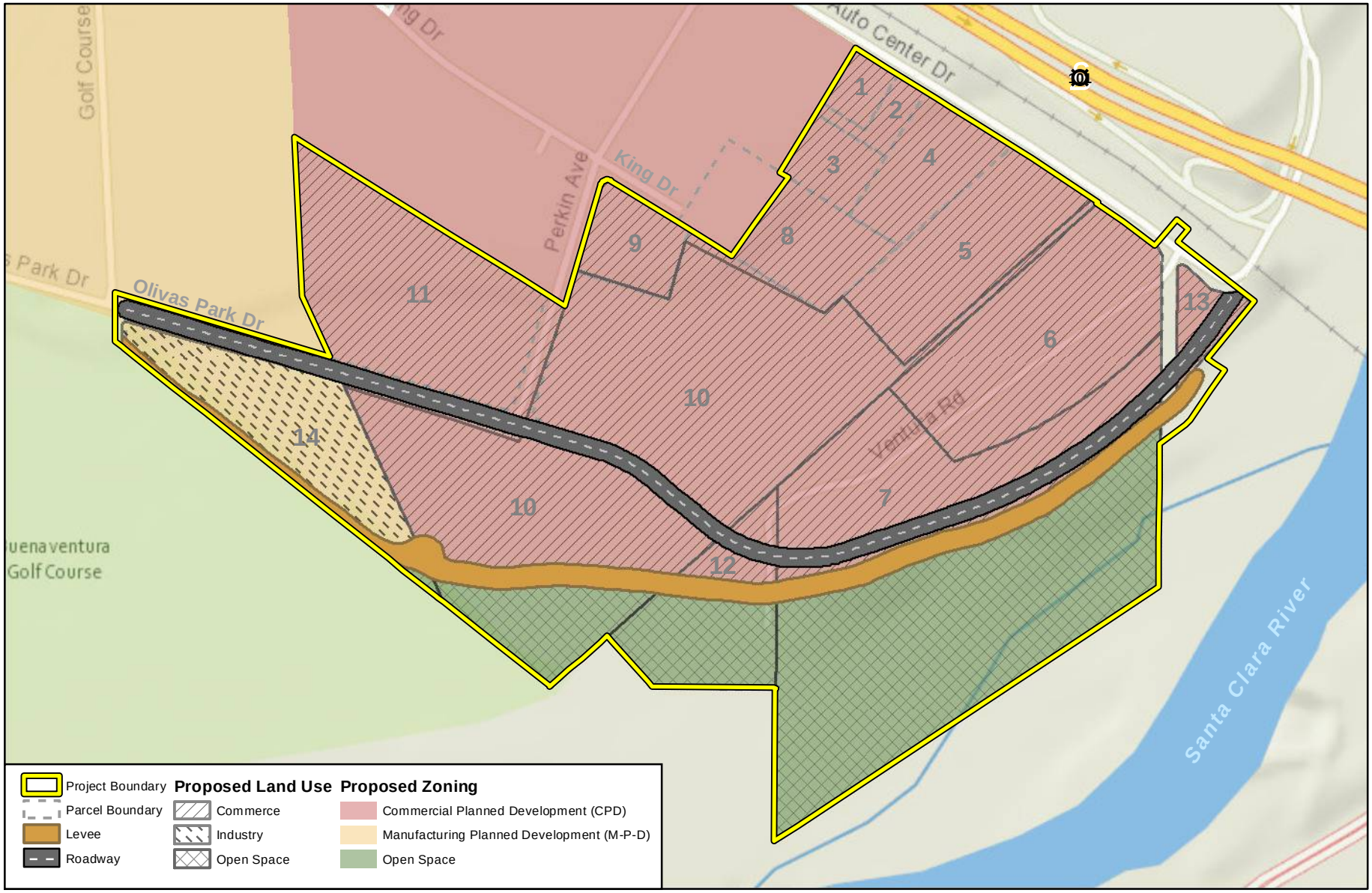
2.4.3 General Plan and Specific Plan Amendments

The proposed General Plan amendments would involve land use re-designations of eight parcels within the ~~111.8~~139-acre project area. A summary of these proposed amendments is provided in Table 2-2, and the new designations are illustrated on Figure 2-4. Figure 2-5 also shows which parcels will undergo land use and zoning changes. The land use designations for three parcels would be changed from Agriculture to Commerce, the land use designations for two parcels would be changed from Specific Plan to Commerce, the land use designations for two parcels would be changed from Industry to Commerce, and the land use designation for one parcel would change from Agriculture to Industry.

The City's Save Our Agricultural Resources (SOAR) Ordinance requires voter approval for the redesignation of lands designated "Agriculture," but specifies that the City Council may redesignate such lands if it makes certain findings that are supported by evidence. On June 1, 2009, the City Council approved Resolution 2009-032 verifying the location of the SOAR boundary in the vicinity of the proposed Olivas Park Drive extension. The boundary is not clear on the General Plan land use map, but Resolution 2009-032 concludes that the northern boundary of SOAR-designated land was intended to coincide with the southern edge of the future right-of-way for the Olivas Park Drive extension. Therefore, the City Council has determined that the SOAR Ordinance does not apply to the 10 acres of land currently designated "Agricultural Use" that are located along the north side of the proposed road extension. However, SOAR does apply to the approximately ~~31.4~~56.8 acres of land designated "Agriculture" that are on the south side of the proposed road extension. Consequently, re-designation of these lands as proposed would require either voter approval or Council adoption of the required findings, which are discussed in detail in Section 4.8, *Land Use and Planning*.

Table 2-2
Proposed General Plan Amendments/Zone Changes

Parcel Number	APN[a]	Acreage	General Plan Designation	Zoning
1	138-0-230-150	1.3	Remain Commerce	Remain CPD
2	138-0-230-740	0.77	Remain Commerce	Remain CPD
3	138-0-230-730	1.84	Specific Plan to Commerce	Remain CPD
4	138-0-230-130	3.87	Remain Commerce	Remain CPD
5	138-0-230-210	7.31	Remain Commerce	M1 to CPD
6	179-0-050-150	11.99	Industry to Commerce	M2 to CPD
7	179-0-050-160	13.55	Agriculture to Commerce	M2 to CPD
		23.73	Agriculture to Parks & Open Space	M2 to Parks
8	138-0-230-760	3.64	Remain Commerce	R-1-1AC to CPD
9	138-0-230-480	2.75	Specific Plan to Commerce	Remain CPD
10	138-0-230-750	14.27	Remain Commerce	R-1-1-AC CPD
		21.43	Agriculture to Commerce	R-1-1AC to CPD
		4.68	Agriculture to Parks & Open Space	R-1-1AC to Parks
11	138-0-230-650	12.51	Remain Commerce	R-1-1AC to CPD
12	179-0-050-030	2.02	Agriculture (City) and Open Space (County) to Commerce	OS-80 to CPD
		4.63	Agriculture (City) and Open Space (County) to Parks & Open Space	OS-80 (County) to Parks
13	139-0-010-575	1.49	Industry to Commerce	MPD to CPD
14	138-0-230-820	6.85	Agriculture to Industry	R-1-1AC to MPD
		0.31	Agriculture to Parks & Open Space	R-1-1AC to Parks



Basemap Credits: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Other data from County of Ventura, 2010.

Proposed Land Use and Zoning Designations

0 330 660 Feet

Figure 2-4

Basemap Credits: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Other data from County of Ventura,

Parcels with Land Use and Zoning Changes

0 330 660 Feet

Figure 2-5

Two additional General Plan amendments are also proposed

On Figure 4-3 in the Our Accessible Community chapter, the classification of Olivas Park Drive, between Golf Course Drive and Auto Center Drive, is proposed to be changed from a Collector to a Secondary Arterial
On Figure 6-1 in the Our Active Community chapter, elimination of the linear park shown on the south side of Olivas Park Drive, between Victoria Avenue and Johnson Drive is proposed. Removal of the linear park would not remove the Class I bike path adjacent to the Santa Clara River. The project also involves a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan. Specifically, two parcels (parcels 3 and 9 in Table 2-2 and shown on figures 2-3 and 2-4) totaling 4.59 acres would be removed from the Specific Plan and designated Commerce.

2.4.4 Zoning Changes

The proposed project would also include rezoning of nine parcels totaling ~~101.27~~128.41 acres. These zone changes are summarized below.

~~One p~~Parcel 5 (7.31 acres) would be changed from Limited Industrial (M1) to CPD, which would be consistent with the current Commerce land use designation for that parcel.

All of Parcel~~s~~ 6 and part of Parcel 7 (~~28.66~~25.54 total acres) would be changed from General Industry (M2) to CPD, which would be consistent with the proposed Commerce land use designations for ~~those~~ that parcel~~s~~. These parcels may eventually change to Manufacturing Planned Development (MPD), which may require a General Plan amendment. However, this change would require no new analysis as the EIR analyzes a worst-case scenario.

Part of Parcel 7 (23.73 acres) would be changed from M2 to Parks.

All of parcels 8 and 11 and most of Parcel 10 (~~53.47~~51.85 total acres) would be changed from Single Family Residential (R-1-1AC) to Commercial Planned Development (CPD), which would be consistent with the current and proposed Commerce land use designations for those parcels.

Part of parcels 10 and 14 (4.99 total acres) would be changed from R-1-1AC to Parks.

~~One~~ Part of Parcel 12 (~~3.18~~2.02 acres) would be changed from ~~Agriculture~~ OS-80 (County) to CPD, which would be consistent with the proposed Commerce land use designation for that parcel.

Part of Parcel 12 (4.63 acres) would be changed from OS-80 (County) to Parks.

Parcel 13 (1.49 acres) would be changed from MPD to CPD, which would be consistent with the proposed Commerce land use designation for that parcel.

~~One~~ Most of Parcel 14 (~~7.16~~6.85 acres) would be changed from R-1-1AC to MPD, which would be consistent with the proposed Industry land use designation for that parcel.

Figure 2-4 shows the proposed zoning (and land use) designations of each parcel. Figure 2-5 shows the parcels with proposed zoning changes and general plan amendments. The project also includes a pre-zone and annexation of one County parcel.

The Commerce and Industry land use standards in the General Plan do not include a maximum development density. However, zoning designations limit lot coverage to 50% and building height is limited to 75 feet. Based on an assumed maximum floor-to-area ratio (FAR) of 0.33:1, the project acre area could accommodate a maximum of about 1,258,000 square feet of commercial development, and 75,000 square feet of industrial development (see Table 2-3). These totals are inclusive of existing project site development.

Table 2-3
Project Area Development Potential

Properties	Developable Area (acres)[a]	Proposed Zone	Building Area (square feet)[b]
Commercial			
Hofer (parcels 1-5, 8-11)	65.0	CPD	934,361
VOC and City (parcels 6, 7, 13)	21.5	CPD	309,058
MCSD (parcel 12)	1.0	CPD	14,375
Commercial Total	**77.5**		**1,257,794**
Industrial			
Wolff (parcel 14)	5.2	MPD	74,749

[a] *Includes developable acres only (generally, acreage north of the proposed levee, excluding the proposed road extension).*
[b] *Based on a floor-to-area ratio (FAR) of 0.33:1.*

2.4.5 Grading

Construction of the proposed levee would require a total of 81,472 cubic yards of fill and excavation of 48,298 cubic yards. It is assumed that soil would be balanced on-site and the remaining 33,174 cubic yards needed for fill would be imported. Grading for the proposed roadway extension would be balanced on-site.

2.4.6 Other Infrastructure Improvements/Issues

As part of a separate action, the existing wastewater treatment components at the MCSD would be abandoned and removed. Wastewater currently treated at this facility would be diverted to the City's Ventura Water Reclamation Facility (VWRF) from the terminus of the MCSD system to the existing sewer trunkline in Olivas Park Drive.

~~As part of a separate action~~In conjunction with the Olivas Park Drive extension, the Montalvo Community Services District (MCSD) has proposed to abandon its wastewater treatment facility ~~is proposed for abandonment~~. Because the alignment of the proposed roadway extension and levee/floodwall intersects the MCSD property, the City of Ventura has agreed to divert the

wastewater that is currently processed at the Montalvo facility through a tie-in via a 15-inch sewer line to the existing 36-inch Bristol Relief Sewer located in Golf Course Drive. The Olivas Park Drive extension would include wastewater infrastructure to link the existing sewer lines located in Perkin Avenue with the wastewater that is received at the MCSD facility. All wastewater from this vicinity would then be treated at the City's main treatment facility (Ventura Water Reclamation Facility) at Harbor Boulevard.

Future development within the project would be subject to the following features related to water supply:

1. All property within the project site boundary shall turn over water rights to the City (at a maximum the City currently believes 99 AF based on 66 acres per the General Plan acreage but could be nothing if Fox Canyon GMA does not grant the conversion from agricultural lands to municipal / industrial purposes .

For any additional water needs over the above water rights given to the City the following shall be used:

2. All development shall be served (and construct systems) by reclaimed water.
3. All property owners shall agree to utilize best management practice (BMP) low water use standards.
4. The project shall comply with the City's Water Dedication and In-Lieu Fee Ordinance if adopted by the City. If no such Ordinance has been adopted then subsequent project applicants will acquire water rights to transfer to the City.

~~4. Water in-lieu fee payments shall be made if such a system is put in place; if no fee is in place then the applicants will acquire water rights to transfer to the City.~~

5. Water demand for project site developments shall be added to the City's Water Demand / Supply Matrix. Each individual parcel developed will be re-evaluated and approved contingent upon an adequate supply of water.

2.5 PROJECT OBJECTIVES

The City's objectives for the proposed project are as follows:

To improve circulation in the area by providing a link between Johnson Drive and the current terminus of Olivas Park Drive
To protect existing and future development in the project site vicinity from flooding along the Santa Clara River
To allow for the logical development of the project site vicinity with commercial and industrial uses compatible with those within and around the Ventura Auto Center
To allow for commercial development that would provide local jobs and increase the City's sales tax base

2.6 REQUIRED APPROVALS

Implementation of the proposed project would require the following discretionary approvals from the City of Ventura:

Certification of the EIR
General Plan Amendment for Figure 4-3, Roadway Classification Plan to revise the classification of Olivas Park Drive between Golf Course Drive and Auto Center Drive from "collector" to "secondary arterial"
General Plan Amendment to revise Figure 6-1, Public Facilities to eliminate the linear park shown on the south side of Olivas Park Drive between Victoria Avenue and Johnson Drive;
General Plan Amendment to re-designate parcels from Agriculture to Commerce, Specific Plan to Commerce, Industry to Commerce, ~~and~~ Agriculture to Industry, and Agriculture to Parks & Open Space
Rezone from: M1, M2, MPD, ~~Agricultural and~~ R-1-1AC, and OS-80 (County) to CPD; ~~and~~ R-1-1AC to MPD; and M2 and R-1-1AC to Parks
Specific Plan Amendment to remove two properties totaling 4.59 acres from the boundaries of the Auto Center Specific Plan
Adoption of the required findings pursuant to the City's SOAR Ordinance to allow the City Council to redesignate ~~31.4~~58.6 acres south of the proposed Olivas Park Drive extension that are currently designated as "Agriculture" to "Commerce", "Industry", and "Parks and Open Space"
Annexation of the Montalvo Community Services District parcel

In addition to the above City approvals, the following approvals would be needed from other agencies:

Ventura County Local Agency Formation Commission (LAFCo) approval of a sphere of influence amendment to include the Montalvo Community Services District parcel; annexation of the same territory to the City; and detachment of the same territory from the Ventura County Resource Conservation District, the Ventura County Fire Protection District, and County Service Areas 32 and 33.
Ventura County Watershed Protection District approval of a new storm drain to the Santa Clara River
Letter of Map Revision (LOMR), Watershed Permit (FEMA)
Section 401 Certification, Regional Water Quality Control Board
Section 404 Permit, Army Corps of Engineers (ACOE)
Section 1603 Permit (Streambed Alteration Agreement), California Department of Fish and Wildlife
State and Federal Endangered Species Act Compliance, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and National Marine Fisheries Service
Potential Caltrans Encroachment Permit for any work associated with the Johnson Drive southbound on- and off-ramps from U.S. Highway 101

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3.0 ENVIRONMENTAL SETTING

This section describes the current environmental conditions for the project site 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 2012 population of 107,166 (California Department of Finance, January 2012). 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 PROJECT SETTING

The project site is located along the southern edge of Ventura, along the northern bank of the Santa Clara River. More specifically, the project site is between Golf Course Drive and Johnson Drive south of the Ventura Auto Center. The project site includes active agricultural and industrial/commercial land uses as well as a wastewater treatment plant. To the south is the Santa Clara River. The Ventura Auto Center is located to the north of the project site and the Buenaventura Golf Course is located to the west.

Portions of the project 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 (Hawks and Associates Engineering, 2010).

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.

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.

The project site is located geographically along 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 project site. For example, aesthetic and noise impacts associated with the proposed Olivas Park Drive Extension and related development 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 project 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.

The cumulative impact analysis also considers the effects of a levee that the City of Oxnard is considering for the east side of the Santa Clara River. This levee is to intended to function in tandem with the levee that is proposed as part of the project in order to address flood and erosion issues on both sides of the river.

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 will be 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 project area.

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4.1 AESTHETICS

This section evaluates potential impacts to scenic corridors, visual conditions, and light and glare resulting from the proposed project.

4.1.1 Setting

a. Visual Character of Ventura. Ventura has a wide variety of landscapes and seascapes, including natural, agricultural, and urban components. Ventura is situated between the Pacific Ocean and the Ventura foothills. The City is primarily located between the Ventura and Santa Clara rivers. Much of the City is located on a relatively flat coastal plain, with steeply sloped hills abutting 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.

Hillsides. The northern portion of Ventura consists of rolling hills and steep mountains. West of the Ventura River, hills form the western and northern boundaries of the City. Mesas and steep bluffs provide variation and create visual interest. Slopes can exceed 60% in the Ventura hillsides. The hillsides dominate much of the City landscape. The visual quality of the hillsides is a function of their open space, partially agricultural character, and topographic diversity.

The visual condition of the hillsides varies widely depending on whether and how an area has been developed (residential or industrial) and how visible it is. The hills west of the Ventura River have a significant amount of oil production activity that is not screened and is highly visible from portions of West Ventura, including State Route 33. The hillside areas above the Downtown and Midtown communities include substantial residential development, which has significantly altered their visual character. Farther east, the hillsides include a mix of residential communities (Skyline, Ondulando), orchards, and open space.

Shorelines. Ventura's beaches begin at the mouth of the Santa Clara River and continue in a northwesterly direction to Promenade Park at the southern terminus of Figueroa Street. Beyond this point, the beaches become rocky, providing a variation in the visual character of the coastline. The coastline and offshore views exhibit extensive human-made alterations in the form of the Ventura Pier, Ventura Harbor, and several breakwaters along the shore.

Most of the area directly inland from the beaches from the Ventura Marina to San Buenaventura State Beach Park is densely developed.

Rivers and Barrancas. The Santa Clara River forms the southeastern boundary of the City. The river and adjacent floodplain serve as important visual elements in creating a scenic approach to the City from the south. The river is nearly dry most of the year, exposing an expansive rock and sand streambed interspersed with riparian vegetation. Aside from the visual opportunities provided from the City circulation system, the Santa Clara River is visible only to residents in the southeastern portion of the City along the northern riverbank and to some hillside residents. Human-made features such as sand and gravel operations, maintenance

roads, levees, and utility lines are all present, but do not dominate views of the Santa Clara River.

The Ventura River and its associated floodplain form a distinctive landmark along the western boundary of the City as it parallels the State Route 33 for several miles. Views of the river from the highway are limited by the levee between the river and the freeway.

The City contains several barrancas of varying depth and width that add another visual dimension to the landscape. In their natural state, barrancas are often densely vegetated and provide a pleasant contrast to surrounding urban or undeveloped areas because of their lush green appearance.

Agricultural Lands and Windrows. Agricultural activity is prevalent in portions of East and West Ventura. Orchards and irrigated row crops create distinctive colored patterns that contrast sharply with the urban landscape and with the wheat-colored grasslands of the hillsides from April through November. Large parcels of farmland in East Ventura are interspersed with suburban residential developments, providing a visual break from the suburban land use pattern.

Windrows are rows of trees planted adjacent to agricultural lands to serve as windbreaks. They function as visual accompaniments to the various agricultural parcels throughout the City. Tree windrows also serve as reference points or demarcation lines within the community.

b. Visual Character of the Project Area. The project area is located between Golf Course Drive and Johnson Drive, primarily in the City of Ventura. The irregular shaped project site includes 14 parcels on 111.8 acres. The area is primarily flat, offering expansive views across the project site.

The project site includes eight parcels that are currently developed in whole or in part with uses such as auto sales, a gaming club, recreational vehicle sales, and vehicle/truck storage. The Montalvo Community Services District (MCSD) wastewater treatment facility occupies one parcel on the project site. A portion of the site has historically been used for row crop production.

Surrounding uses include auto sales to the north, commercial uses to the northwest, and a golf course to the southwest. Auto Center Drive, the Southern Pacific Railroad, and the U.S. 101 are to the north of the project site, and the Santa Clara River lies to the south and east.

The Santa Clara River and adjacent floodplain create a scenic approach to the City from the south. The river is nearly dry most of the year, exposing an expansive rock and sand streambed, interspersed with riparian vegetation. Topography within the project area is generally flat, but slopes gently downward toward the river.

The project site is highly visible from U.S. 101. In particular, from U.S. 101, auto center, commercial and industrial uses are highly visible to passing motorists.

c. Existing Views of the Project Area. Principal travel corridors are important to analyses of aesthetic features because travel corridors define the vantage point for the largest

number of viewers. Travel corridors in the project area include U.S. 101, the existing Olivas Park Drive, Auto Center Drive, and Johnson Drive. A description of each view corridor follows.

U.S. 101. U.S. 101 functions as a main artery for movement in and through the City. Community shopping centers and highway-oriented uses are concentrated along this corridor. Views from the U.S. 101 within the City consist primarily of commercial and residential development, although some agricultural lands remain and are visible as one travels through the City. U.S. 101 is the major public viewing corridor traversing the City in a northwest/southeast direction.

The project area is visible from the U.S. 101 approach to the City from the south, across the Santa Clara River. U.S. 101 is elevated from the project area and looks down and across the project area. U.S. 101 is identified as a scenic route in the City's 2005 General Plan and is eligible for State scenic route designation.

From the U.S. 101 looking south toward the project area, drivers can see riparian vegetation in the Santa Clara River, including some tall trees; commercial and industrial buildings, including substantial signage for those uses; surface parking lots, including many cars parked at the auto center uses within the project area; roadways with cars and trucks, including Olivas Park Drive; and agricultural land, including primarily coverings for row crops.

Olivas Park Drive. Olivas Park Drive connects the Harbor area to the southern portion of the City to the east. The road travels through the agricultural area between the southern edge of the City and the Santa Clara River and provides views of this area as well as the hillsides as a backdrop to the City.

Views in the project area from Olivas Park Drive consist of Buenaventura Golf Course, vacant, inactive agricultural land, active agricultural land, commercial and industrial uses. U.S. 101 is visible from Olivas Park Drive in the distance, as well as riparian vegetation along the riverbank.

Johnson Drive. Johnson Drive is a relatively high-speed travel corridor that connects East Ventura to U.S. 101. The corridor is characterized by suburban-scale retail development. A number of vacant parcels are present near the U.S. 101 interchange, north of the freeway.

Existing views of the project area from Johnson Drive are predominantly suburban, consisting of industrial uses, such as a truck yard and loading dock, U.S. 101, and the Southern Pacific Railroad tracks.

Auto Center Drive. Auto Center Drive fronts U.S. 101 southbound lanes, the Southern Pacific Railroad tracks, and the industrial and business park area of West Ventura. This roadway's location, between the freeway and the auto center, limits views to predominantly commercial uses despite proximity to agricultural uses and vacant lands.

Figures 4.1-1 and 4.1-2 show existing views of the project site from various vantage points.

Photo 1 - View from U.S. 101.

Photo 2 - View of Agricultural land in the northern portion of parcel 10.

Project Site Photographs

Figure 4.1-1

Photo 3 - View of Auto Center uses looking west from Olivas Park Drive.

Photo 4 - View of industrial uses looking northwest from Olivas Park Drive.

Project Site Photographs

Figure 4.1-2

d. Light and Glare. Nighttime lighting in the project area results from several sources of artificial light, including lights along U.S. 101; streetlights on Olivas Park Drive and Johnson Drive; automobile lights; lighting at existing auto dealership uses; and lighting at other industrial / commercial buildings in the project area.

Sources of glare in the project site vicinity predominantly consist of vehicles in parking lots and on roadways, as well as the windows of buildings on and near the site, which reflect the sunlight. In addition, existing agricultural uses in the vicinity often create sources of glare from equipment and / or coverings for row crops.

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.

2005 General Plan. The City of Ventura's General Plan has designated U.S. 101 and Olivas Park Drive as view corridors having scenic value. The following policies and actions of the General Plan are applicable to aesthetic resources:

Action 3.25: *Establish first priority growth areas to include the districts, corridors, and neighborhood centers as identified on the General Plan Diagram; and second priority areas to include vacant undeveloped land when a community plan has been prepared for such (within the City limits).*

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

Action 4.36: *Require development along the following roadways [including U.S. 101 and Olivas Park Drive] – including noise mitigation, landscaping, and advertising – to respect and preserve views of the community and its natural context.*

Action 4.38: *Continue to work with Caltrans to soften the barrier impact of U.S. Highway 101 by improving signage, aesthetics and undercrossings and overcrossings.*

Action 4.39: *Maintain street trees along scenic thoroughfares, and replace unhealthy or missing trees along arterials and collectors throughout the City.*

Zoning Ordinance. The City's Zoning Ordinance establishes setback, parking and sign standards, building height limits, and building densities.

SOAR Ordinance. The City's Save Our Agricultural Resources (SOAR) Ordinance, adopted by the voters in 1995, prevents changes in specified land use designation unless the land use change is approved by a majority of voters or unless the City Council makes certain findings and these findings are supported by the evidence. The SOAR Ordinance is discussed in detail in Section 4.8, *Land Use and Planning*.

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 project area visual resources against development facilitated by the proposed project, analyzing the nature of the anticipated change and its compatibility with the visual character of the area.

As previously mentioned, U.S. 101 and Olivas Park Drive 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.

To determine the impacts of the proposed project related to light and glare, light and glare impacts were evaluated for motorists along the U.S. 101. The existing sources and amounts of light and glare within the project area were compared with the amount of light and glare that would occur permanently through development of the project area.

Pursuant to the *CEQA Guidelines*, potentially significant impacts would occur if development of the project site would:

> *Have a substantial adverse effect on a scenic vista;*
> *Substantially damages scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;*
> *Substantially degrades the existing visual character or quality of the site and its surroundings; and/or*
> *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.*

b. Project Impacts and Mitigation Measures.

Impact AES-1 The proposed project would involve development that could alter views for travelers along the scenic corridors of the U.S. 101 and Olivas Park Drive. However, the project site does not offer any scenic vistas or scenic resources. Impacts to scenic vistas and scenic resources would be Class III, *less than significant*.

As discussed in Section 4.1.1, *Setting*, U.S. 101 and Olivas Park Drive are identified in the 2005 General Plan as offering high quality views of the community and its natural context.

Proposed Roadway Extension. Construction of the proposed roadway extension would have no impact on scenic views, vistas, and resources. The proposed roadway would not obstruct any high quality views in this area from U.S. 101 or Olivas Park Drive. The roadway would be located in an area that currently contains roadways, surface parking, and commercial / industrial uses. The roadway would not be located in an area that currently has scenic views of the Santa Clara River, hills, or any other scenic feature.

The discussion below is specific to impacts resulting from construction of the proposed levee and any construction facilitated by the proposed General Plan Amendments and Zone Changes.

U.S. 101. Construction of the proposed levee would not substantially alter views from U.S. 101, except temporarily during construction. The levee would be slightly visible from the U.S. 101 northbound, since it would be 13 feet in height and located in close proximity to U.S. 101. However, it would not substantially obstruct any views of the river or views of open or agricultural land.

Existing scenic views of the project area from U.S. 101 would not be substantially altered by construction of the levee. The riparian vegetation along the riverbank would shield views of the levee, particularly after the first few years following construction of the levee. The extensive riparian vegetation in the vicinity of the proposed levee varies in height, but would shield the 13-foot high levee well. In addition, the levee would not adversely affect the visual character of the river since the intention of the levee design is to mimic a natural riverbank.

Commercial development facilitated by the proposed General Plan Amendment and Zone Changes would be visible to motorists along the U.S. 101. The proposed amendments would allow for commercial and industrial development in the project area. This would alter the views of the project site from U.S. 101. In addition, the project would result in the loss of a minor amount of riparian vegetation, including 0.1 acres of Fremont Cottonwood Forest and 0.5 acres of Mulefat Scrub. This would slightly alter the scenic views of the riparian habitat along the Santa Clara River for motorists on the U.S. 101.

The project site includes eight parcels that are currently developed in whole or in part with uses such as auto sales, a gaming club, recreational vehicle sales, and vehicle/truck storage. The MCSD wastewater treatment facility occupies one parcel on the project site. A portion of the site has historically been used for row crop production.

Surrounding uses include auto sales to the north, commercial uses to the northwest, and a golf course to the southwest. Auto Center Drive, the Southern Pacific Railroad, and the U.S. 101 are to the north of the project site, and the Santa Clara River lies to the south and east.

The proposed commercial and industrial development would be similar in character to the existing visual character of the project site, which consists of primarily commercial, industrial, and agricultural land uses. Views of commercial development in the project area would be consistent with the predominantly suburban views along this segment of the U.S. 101 corridor.

The proposed uses would not be located immediately adjacent to U.S. 101, but would be blocked by existing industrial development that lies between the freeway and the project site. This would limit visual access to proposed uses on the project site, reducing the potential impact to scenic views from U.S. 101. In addition, the elevated railroad tracks slightly obstruct views of the project area from the U.S. 101.

Olivas Park Drive. Construction of the proposed levee would place a structure of up to 13 feet in elevation along a portion of the eastern border of the Buenaventura Golf Course and along the riverbank, which would be visible from the existing eastern terminus of Olivas Park Drive.

The levee would partially block views of the riparian vegetation along the riverbank; however, existing views of the riverbank are predominantly blocked by the existing radio station and wastewater treatment plant, which lie to the east of the golf course. The most direct view of the riverbank is at a distance of approximately 1,700 feet looking east from the corner of Olivas Park Drive and Perkin Avenue, which is a marginal view of riparian vegetation and lacks scenic value due to the presence of other industrial uses.

The proposed project would facilitate commercial development on the property south of the proposed roadway extension. Motorists traveling along the existing Olivas Park Drive would experience new views of commercial buildings and parking lots. However, views of the existing property consist of vacant, inactive agricultural land and distant views of the wastewater treatment plant, radio station, and the U.S. 101 from this viewpoint, which do not offer a scenic value.

The marginal views of riparian vegetation along the riverbank could be diminished; however, as previously mentioned, these views are limited and at a distance too far away to be considered to have significant scenic value for motorists.

While there are many scenic views along the U.S. 101 and the existing Olivas Park Drive, the commercial and industrial nature of the project area dominate the landscape and do not provide quality viewing opportunities for motorists. Therefore, effects resulting from construction of the proposed levee and any construction facilitated by the proposed General Plan Amendment 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.

Impact AES-2 Development facilitated by the proposed project would alter the visual character of the project site by replacing agricultural land with commercial uses. While this would be a substantial change from current conditions, future development would be visually compatible with surrounding uses. Thus, the impact to the project site's visual character would be Class III, *less than significant*.

The project site currently contains active agricultural land, vacant land, a wastewater treatment plant, and commercial and industrial uses. The proposed project would replace the wastewater treatment plant and the agricultural and vacant land with a road, levee, and commercial and industrial development. Given that the majority of the project site is currently vacant or agricultural in character, the introduction of the proposed road / levee and future commercial / industrial development would represent an abrupt change from current conditions, as illustrated on figures 4.1-1 and 4.1-2.

Some viewers may see the change to a more suburban visual character as adverse on its face. However, the proposed infrastructure improvements and, in particular, the future commercial and industrial development, would be consistent with the City's vision for the area and would be visually compatible with existing commercial and industrial development on other

properties in and around the project site. In addition, development of vacant lands with commercial and industrial development would be expected to improve overall maintenance of currently vacant properties, thus potentially improving their visual character in this regard. Finally, as discussed under Impact AES-3, the planned development for the site would not adversely affect any identified visual resources or block views of identified visual resources such as mountains or the Pacific Ocean. As such, the change in visual character, though substantial, is not considered significant under CEQA.

Mitigation Measures. Project-specific direct i~~I~~mpacts related to visual character would be less than significant; therefore, mitigation is not required to address project-specific direct impacts.

Significance After Mitigation. The project-specific direct impacts to the area's visual character would be less than significant without mitigation.

Impact AES-3 The proposed project would introduce new sources of light and glare to the project area through roadway lighting, new buildings and parking lots. However, there are no sensitive uses in the project vicinity and compliance with existing City design standards would ensure the appropriateness of light fixtures and building materials. Impacts resulting from light and glare would be Class III, *less than significant*.

The proposed roadway extension and commercial development facilitated by the proposed project would incrementally increase ambient nighttime lighting in the project site vicinity and potentially introduce new sources of glare. The proposed levee would not result in any new sources of light or glare. Increased lighting associated with the roadway extension and commercial development could come from streetlights, parking lot lights, signage on business establishments, and lighting from building interiors. Increased glare could potentially occur as a result of building materials, roofing materials and windows of buildings, and cars reflecting sunlight.

The surrounding uses in the project site vicinity are primarily commercial and industrial, including the Auto Center, which is the primary contributor to the ambient nighttime lighting in the project area. The U.S. 101 also contributes a substantial amount of nighttime lighting from vehicle headlights. Lighting associated with commercial development facilitated by the proposed General Plan Amendment would be set back from the freeway, preventing direct penetration of light into the freeway corridor. Likewise, glare from building materials and parked cars associated with future commercial development would be set back from the freeway and would not adversely affect the safety of motorists in the area.

Lighting associated with new commercial development would be new sources of nighttime lighting along the existing Olivas Park Drive; however, the nighttime lighting would be consistent with lighting associated with manufacturing and commercial uses on the north side of the roadway. Glare from the building materials and parked cars associated with future development along Olivas Park Drive would not be substantial and would not adversely affect the safety of motorists in the area.

Compliance with the City's Zoning Ordinance, Street Lighting and Guidelines, and input from the City's Conceptual Design Review Board would reduce any potential lighting or glare conflicts by mandating appropriate lighting and building materials to reduce potential light and glare impacts.

There are no sensitive uses in the project area (residential uses, hospitals or schools), as the area is characterized by commercial, manufacturing, agricultural, and industrial uses. Therefore, lighting and glare at the project site would not substantially affect any sensitive receptors. Light and glare impacts resulting from the proposed project would be Class III, *less than significant*.

Mitigation Measures. Impacts related to light and glare would be less than significant; therefore, mitigation is not required.

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 under the City of Ventura 2005 General Plan would include the addition of approximately 8,300 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 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 project, in conjunction with other development in the area, would incrementally alter scenic vistas, visual character, and light/glare conditions. In particular, projects that would convert existing agricultural uses to residential uses would result in a cumulative impact to the visual character of the City. The cumulative loss would contribute to the overall change in the aesthetic character of Ventura. This cumulative impact was identified as significant in the 2005 General Plan FEIR and the City Council adopted a Statement of Overriding Considerations for that impact. Although the proposed project's impact has not been identified as significant, the project would incrementally add to this cumulative impact by converting lands designated for agricultural use to a non-agricultural use. The impact of the project is therefore considered cumulatively considerable and its contribution to the cumulative impacts to the City's visual character would be significant. Outside of retaining existing agricultural lands within the project site in their current use, no mitigation is available to address this cumulative aesthetic impact. The project's contribution to this cumulative impact is therefore Class I, significant and unmitigable.

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4.2 AGRICULTURAL RESOURCES

This section analyzes the impacts of the Olivas Park Drive Extension Project on agricultural resources. Impacts relating to the potential conversion of agricultural lands and indirect effects associated with placing urban development adjacent to agriculture are addressed.

4.2.1 Setting

a. General Setting. Ventura County is one of the principal agricultural counties in the state. The estimated gross value for Ventura County agriculture for calendar year 2011 was $1.64 billion, a slight decrease from 2010 but an increase from 2009 (Ventura County Crop Report, 2011). This level of production is made possible by the presence of high quality soils, adequate water supply, favorable climate, long growing season, and level topography. In 2011, the top cash crops in the County were strawberries, raspberries, lemons, nursery stock, celery, tomatoes, avocados, and cut flowers.

There are four general types of agriculture:

> *Row Crops - These include vegetables (such as broccoli and lettuce) and strawberries.*
>
> *Orchards - Most of the City orchards are in lemons, although oranges are found in the flatlands. The orchards located on the hillsides in the northeast portion of the City Planning Area are in avocados.*
>
> *Dry Farming - The only dry farming in the Planning Area is lima beans on the Taylor Ranch.*
>
> *Grazing - Grazing includes lands used for cattle and sheep.*

b. Project Area Agriculture. Historically, farming has occurred on portions of the project site. A portion of Parcel 10 north of the proposed road alignment (see Figure 2-2 in Section 2.0, *Project Description*) is currently being used for farming. Other areas of the site have historically been used for farming, but farming activity other than on Parcel 10 has ceased over the past several years.

As shown in Table 4.2-1, all or portions of four parcels within the project site are currently designated Agriculture in the Ventura General Plan. The total combined area of the parcels designated Agriculture is ~~just over 64~~ estimated at 77.2 acres.

Soil Characteristics. Agricultural classifications of each soil type found within the project site were analyzed based on their Capability Class, California Revised Storie Index grade, and National Resources Conservation Service (NRCS) farmland designation. Capability Classes provide insight into the suitability of a soil for field crop uses based on factors that include texture, erosion, wetness, permeability, and fertility. As defined in Government Code Section 51201 (California Land Conservation Act of 1965), Capability Class 1 and Class 2 soils qualify as prime agricultural land.

Table 4.2-1
Proposed General Plan Amendments

Parcel Number [a]	APN	Acreage
7	179-0-050-160	37.28
10	138-0-230-750	26.11
12	179-0-050-030	~~3.18~~6.65
14	138-0-230-820	7.16
Total		**77.2**

[a] *See Figure 2-3 in Section 2.0, Project Description, for parcel locations.*

The Storie Index is a soil rating based on soil properties that govern a soil's potential for cultivated agriculture in California. The Storie Index assesses the productivity of a soil from the following four characteristics:

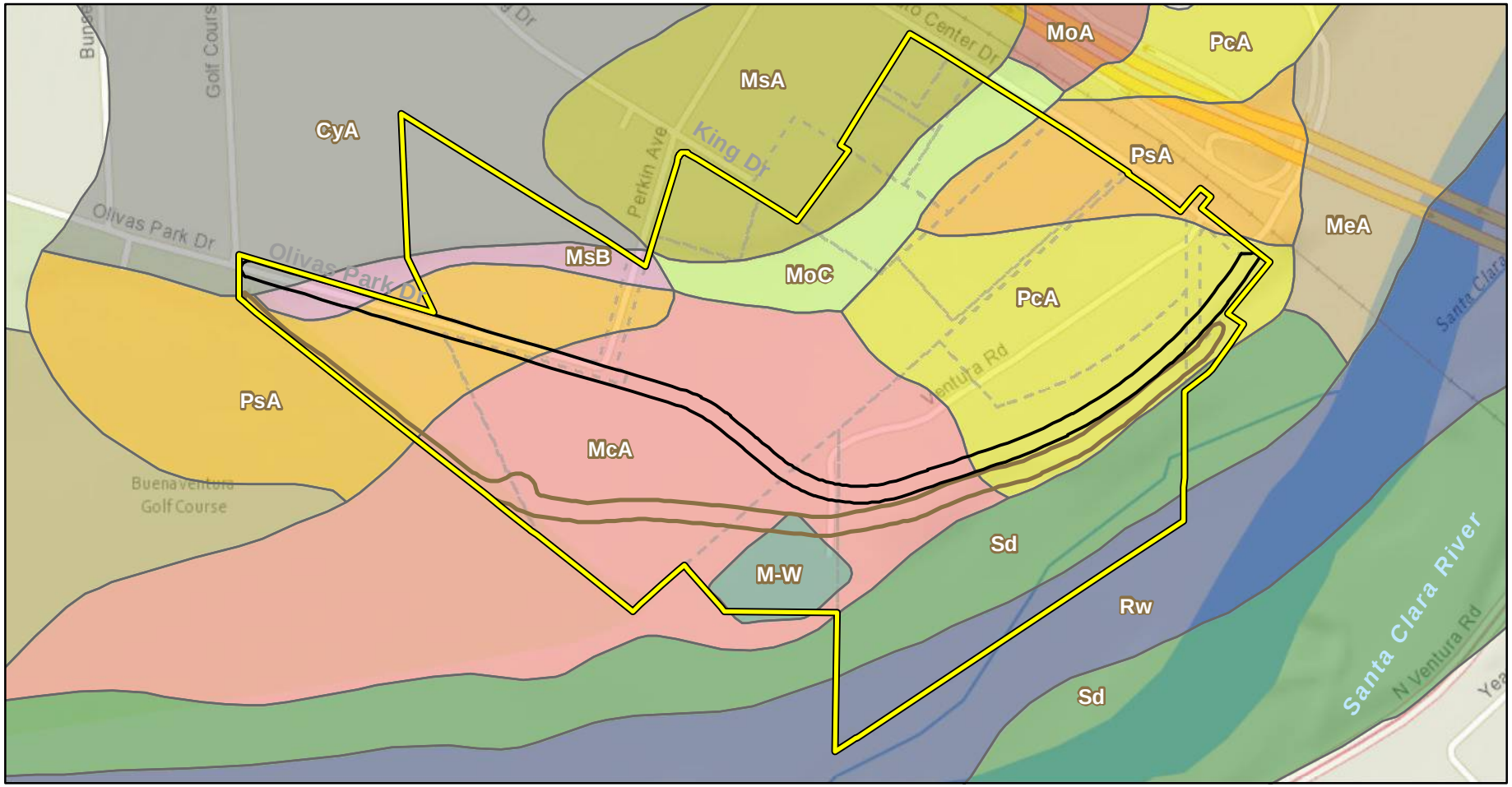
Factor A - degree of soil profile development
Factor B - texture of the surface layer
Factor C - slope
Factor X - manageable features, including drainage, micro relief, fertility, acidity, erosion, and salt content

As defined in Government Code Section 51201 (California Land Conservation Act of 1965), soils with a Storie Index from 80 to 100 qualify as prime agricultural land. Under the California Revised Storie Index, this translates to Grade 1 (excellent) index rating. The NRCS farmland classification identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. It identifies map units as Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, or Unique Farmland.

Figure 4.2-1 depicts the locations of soils on-site and Table 4.2-2 provides information on the classification of soils on-site.

Important Farmlands. The California Department of Conservation (DOC) identifies and designates important farmlands throughout the State as part of their Farmland Mapping and Monitoring Program (FMMP). The FMMP rating systems classifies farmland according to the following criteria:

Prime Farmland - Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. These are Class I and Class II soils.



Basemap by National Geographic, 2013 Soil Data from SUGRO, 2008.

- Project Boundary
- Roadway
- Levee
- Parcel Boundary
- CyA - CROPLEY CLAY, 0 TO 2 PERCENT SLOPES
- M-W - MISCELLANEOUS WATER
- McA - METZ LOAMY FINE SAND, 0 TO 2 PERCENT SLOPES
- MeA - METZ LOAMY SAND, 0 TO 2 PERCENT SLOPES
- MoA - MOCHO LOAM, 0 TO 2 PERCENT SLOPES
- MoC - MOCHO LOAM, 2 TO 9 PERCENT SLOPES
- MsA - MOCHO CLAY LOAM, 0 TO 2 PERCENT SLOPES
- MsB - MOCHO CLAY LOAM, 2 TO 5 PERCENT SLOPES
- PcA - PICO SANDY LOAM, 0 TO 2 PERCENT SLOPES
- PsA - PICO LOAM, SANDY SUBSTRATUM, 0 TO 2 PERCENT SLOPES
- Rw - RIVERWASH
- Sd - SANDY ALLUVIAL LAND

0 400 800 Feet

Soils Map

Figure 4.2-1

Table 4.2-2
Project Soil Map Units and Farmland Classification

Map Unit Symbol	Name	Capability Class		CA Revised Storie Index	NRCS Prime Farmland Classification[1]	Prime?
		Irrigated	Non-Irrigated			
Cya	Cropley clay (0-2% slopes)	2	3	Grade Three – Fair	Prime farmland if irrigated	Yes
M-W	Miscellaneous Water			Not Rated	Not prime farmland	No
McA	Metz loamy fine sand (0-2% slopes)	3	3	Grade Two – Good	Prime farmland if irrigated	Yes
MeA	Metz loamy sand (0-2% slopes)	3	3	Grade Two – Good	Prime farmland if irrigated	Yes
MoA	Mocho Loam (0-2% slopes)	1	3	Grade One - Excellent	Prime farmland if irrigated	No
MoC	Mocho Loam (2 to 9% slopes)	2	3	Grade One – Excellent	Farmland of Statewide Importance	No
MsA	Mocho Clay Loam (0-2% slopes)	1	3		Prime farmland if irrigated	No
MsB	Mocho clay loam (2-5% slopes)	2	3	Grade One – Excellent	Prime farmland if irrigated	Yes
PcA	Pico sandy loam (0-2% slopes)	2	3	Grade One – Excellent	Prime farmland if irrigated	Yes
PsA	Pico loam, sandy substratum (0-2% slopes)	3	3	Grade One – Excellent	Farmland of statewide importance	Yes
Rw	Riverwash	8			Not prime farmland	No
Sd	Sandy alluvial land		4	Grade Two – Good	Not prime farmland	No

[1] NRCS prime farmland classification differs from the Department of Conservation (DOC) important farmland designation. Refer to Section 4.2.1(e) (Farmland Characteristics) below for additional information on the difference between these two ratings.
Sources: U.S. Department of Agriculture (USDA), Soil Conservation Service (SCS), Soil Survey of Ventura County, California, Ventura Area, 2013. Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at http://websoilsurvey.nrcs.usda.gov/ accessed 2/20/2013.

Farmland of Statewide Importance - Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Unique Farmland - Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards as found in some climactic zones in California.

Urban and Built-Up Land - Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land - Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas, not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities;

strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

DOC important farmlands differ from the NRCS farmland classification shown in Table 4.2-2 because the NRCS farmland classification is based solely on soil quality, while the DOC important farmland designation is based on both soil quality and current land use.

Figure 4.2-2 shows the Farmland Mapping and Monitoring Map for the project site. The project site contains ~~43.36~~about 29 acres of Prime Farmland, ~~18.32~~1-2 acres of Farmland of Statewide Importance.

c. Agricultural/Urban Interface Issues. Issues concerning the agricultural/urban interface include:

Potential Issues for Urban Interests

Use of pesticides/dust problems in vicinity of high human intensity uses
Odors associated with pesticides and fertilizers
Noise related to farming equipment
General effects of agriculture on air quality

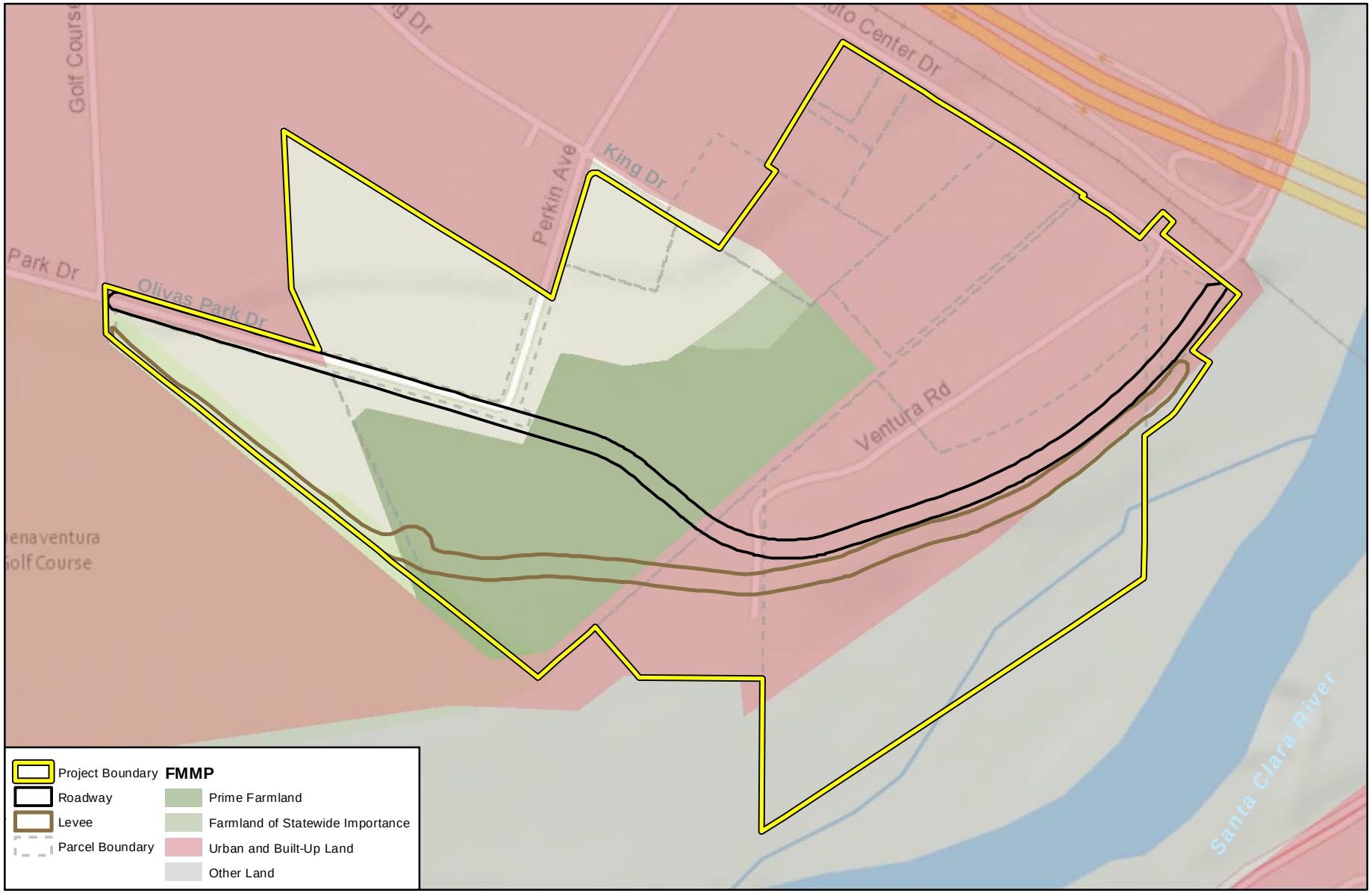
Potential Issues for Agricultural Interests

- *Restrictions on activity*
- *Restrictions on conversion*
- *Loss of revenue and competitiveness*
- *Competition for water and land*
- *Pilferage, trespassing, and littering*
- *Dust from adjacent construction activity*

d. Regulatory Setting. A number of state and local regulatory mechanisms are in place to preserve farmland and agricultural activity. These mechanisms are described below.

Williamson Act/Land Conservation Act. A primary tool to preserve farmlands is the California Land Conservation Act (LCA) or Williamson Act contract program, established in 1965. Under provisions of the Act, private landowners may voluntarily enter into a long-term contract (minimum of 10 years) with cities and counties to form agricultural preserves and maintain their property in agricultural or open space uses in return for a reduced property tax assessment based on the agricultural value of the property. The term of an LCA contract is generally ten years and the contract automatically renews itself each year for another ten-year period, unless a Notice of Non-Renewal is filed or the contract is cancelled.

State Government Code Section 51282 provides specific findings that must be made for the approval of LCA contract cancellations. Ventura County entered the program in 1969, and in 2007 the County had 907 LCA (10-year) contracts and 57 Farmland Security Zone Area (FSZA/LCA) (20-year) contracts in the unincorporated area, for a total of approximately 128,900 acres under contract (Ventura County Planning Division, 2008).



Basemap by National Geographic, 2013.
California Department of Conservation, 2008.

Farmland Mapping and Monitoring Program Map

Figure 4.2-2

There are no LCA contract properties within the project site. As such, the development facilitated under the proposed project would not conflict with an existing LCA contract.

Save Our Agricultural Resources (SOAR) Initiative. In November 1995, a majority of voters (52%) in Ventura passed the Save Our Agricultural Resources (SOAR) Ordinance, which was also called the Agricultural Lands Preservation Initiative. The Ventura County SOAR Initiative (Measure B) passed in November 1998 by a 63% majority.

The City's SOAR Ordinance requires voter approval for the re-designation of lands designated Agriculture, but specifies that the City Council may re-designate such lands if it makes certain findings that are supported by the evidence. On June 1, 2009, the City Council approved Resolution 2009-032 verifying the location of the SOAR boundary in the vicinity of the proposed Olivas Park Drive extension. The boundary is not clear on the General Plan land use map, but Resolution 2009-032 concludes that the northern boundary of SOAR-designated land was intended to coincide with the southern edge of the future right-of-way for the Olivas Park Drive extension.

Therefore, the City Council has determined that the SOAR Ordinance does not apply to portions of the project site currently designated Agriculture that are located along the north side of the proposed road extension. However, SOAR does apply to portions of the site designated Agriculture that are on the south side of the proposed road extension. Consequently, re-designation of these lands as proposed would require either voter approval or Council adoption of the required findings, which are discussed in detail in Section 4.8, *Land Use and Planning*.

Greenbelt Agreements. Several cities, Ventura County, and the Local Agency Formation Commission (LAFCO) have adopted greenbelt agreements between jurisdictions to further the objectives of the Guidelines for Orderly Development and to assist in preserving agriculture and other open space lands located between cities. Greenbelt agreements are joint or co-adopted resolutions by cities, the County (when applicable) and LAFCO, whereby it is agreed to cooperatively administer a policy of non-annexation and non-development in a specific area.

The basic purpose of greenbelts is to establish a mutual agreement between cities regarding the limits of urban growth for each city. A greenbelt agreement must be amended by all parties involved before the LAFCO will consider any proposal that may be in conflict with the agreement.

The City of Ventura is a participant in two greenbelt agreements. Ventura and Santa Paula adopted an agreement in 1967 to maintain the area between the Franklin Barranca east of the Ventura city limits and the Adams Barranca west of the Santa Paula city limits in agriculture production. The majority of agricultural lands in this greenbelt are under LCA contract. Ventura first entered into a greenbelt agreement with the City of Oxnard in 1994 and updated the agreement in 2002.

No portion of the project site is within either of the greenbelts to which the City of Ventura is party.

Right-To-Farm Ordinances. In 1997, the City of Ventura adopted a Right-To-Farm Ordinance to provide protection to farmers against nuisance claims and frivolous lawsuits involving legal and accepted farming practices. The measure requires realtors to disclose potential conflicts with agriculture (e.g., pesticide odors, noise from machinery, pesticides use) when properties adjacent to agricultural parcels are for sale. The ordinance also provides a statement that agriculture is not subject to nuisance claims if it is being properly conducted. Ventura County also has a Right-To-Farm Ordinance that mediates similar disputes between neighboring cities.

2005 General Plan Goals and Policies. The 2005 General Plan contains several goals and policies that address agriculture resources. Applicable goals and policies include:

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

Policy 3D: Continue to preserve agricultural and other open space lands within the City's Planning Area.

Action 3.17 Continue to support the Guidelines for Orderly Development as a means of implementing the General Plan, and encourage adherence to these Guidelines by all the cities, the County of Ventura, and the Local Agency Formation Commission (LAFCO); and work with other nearby cities and agencies to avoid urban sprawl and preserve the rural character in areas outside the urban edge.

Action 3.20 Pursuant to SOAR, adopt development code provisions to "preserve agricultural and open space lands as a desirable means of shaping the City's internal and external form and size, and of serving the needs of the residents.

Action 3.21: Adopt performance standards for non-farm activities in agricultural areas that protect and support farm operations, including requiring non-farm uses to provide all appropriate buffers as determined by the Agriculture Commissioner's Office.

Agricultural / Urban Buffer Policy. The Ventura County Agricultural Commissioner indicates that ideal setbacks include a 300-foot setback to new structures and sensitive uses on the non-agricultural property, or a setback of 150 feet with a vegetative screen (Agricultural / Urban Buffer Policy, County of Ventura Office of Agricultural Commissioner, 2006). Low human-intensity uses are considered acceptable with setbacks of less than 150 feet as long as vegetative screening is present.

4.2.2 Impact Analysis

a. Methodology and Significance Thresholds. Agricultural resource impacts were evaluated based upon review of DOC and NCRS classifications, regulatory requirements that apply to the various agricultural lands within the project site, and the potential for future development to create agricultural / urban interface.

As identified in *Appendix G* of the *CEQA Guidelines*, impacts to agriculture would be significant if the project would:

> *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.*
>
> *Conflict with existing zoning for agricultural use, or a Williamson Act contract.*
>
> *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.*

As discussed in the *Setting*, no properties within the project site are under an LCA contract. Please refer to Section 4.8, *Land Use and Planning*, for discussion of impacts related to the SOAR Ordinance.

b. Project Impacts and Mitigation Measures

Impact AG-1 Construction of the roadway extension, levee, and development facilitated by the proposed project would involve the conversion of about 30-31 acres of State-designated Prime Farmland and Farmland of Statewide Importance to non-agricultural use. Proposed mitigation would reduce this impact to the degree feasible, but would not reduce the impact to below a level of significance. Therefore, this would be a Class I, *significant and unavoidable*, impact.

The proposed project would involve the extension of Olivas Park Drive, the construction of a levee/floodwall, General Plan amendments, a Specific Plan amendment, and zone changes for parcels within the project boundaries. The proposed General Plan land use designations would allow development of the site with approximately 1,258,000 square feet of commercial uses and 75,000 square feet of industrial uses. As discussed in the *Setting*, there are approximately ~~43.36~~29 acres of Prime Farmland, and ~~18.32~~1-2 acres of Farmland of Statewide Importance within the project site. The proposed roadway extension and levee/floodwall, along with future development that could occur as a result of the General Plan Amendments and zone changes, would convert this acreage to non-agricultural uses. Of these approximately ~~62~~ 30-31 acres, only a portion of Parcel 10 north of the proposed alignment of the Olivas Park Drive extension is currently being farmed. The remainder of the acreage has been vacant for several years and, as discussed under Impact LU-2 in Section 4.8, *Land Use and Planning*, at least one former agricultural operator in the area has indicated that changes in drainage in the area and adjacent non-compatible uses that make farming unprofitable. Nevertheless, the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural uses is considered a significant impact under CEQA.

The proposed project would also re-designate ~~an estimated 64.33~~about 85 acres of land currently designated Agriculture under the Ventura General Plan to commercial and industrial designations. Of this total, an estimated 31.4 acres are subject to Ventura's SOAR Ordinance.

Consistency with City policies related to agricultural land and production, including the SOAR Ordinance, is discussed in Section 4.8, under Impacts LU-1 and LU-2.

Mitigation Measures. As discussed in the *Setting*, the City of Ventura participates in a number of programs and policies specifically aimed at conserving agricultural lands both within and adjacent to the City limits. These include the SOAR Ordinance, which requires voter approval for re-designation of agriculturally-designated lands, and two separate greenbelt agreements that maintain farmland between Ventura and the cities of Oxnard and Santa Paula. ~~Outside of retaining the current Agriculture designations on the project site and not allowing development of Prime and Statewide Importance Farmland with non-agricultural uses, no mitigation is available to reduce this impact to a less than significant level.~~Mitigation Measure AG-1 would further mitigate the impact related to conversion of Prime and Statewide Importance farmland to non-agricultural uses. Also, p~~P~~lease see Section 6.0, *Alternatives,* for a discussion of project alternatives that would reduce this impact.

AG-1 Agricultural Conservation Easement. Mitigation shall be provided for the loss of state-designated Prime Farmland and Farmland of Statewide Importance in existence at the time property in the project area containing such state-designated Farmland is developed. Applicants seeking to develop such state-designated Farmland shall cause to be set aside in perpetuity agricultural lands of equivalent acreage (a 1:1 ratio) and with soil and farming conditions equivalent or superior to the state-designated Farmland that the applicant seeks to convert to other uses. The applicant shall either purchase one or more permanent, irreversible agricultural easements for the benefit of the City or other qualifying entity acceptable to the City, or contribute funds to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements, to be earmarked for the purchase of permanent, irreversible agricultural easements. The protected acreage equal to the total acreage of, and of equivalent soil and farming conditions to, the state-designated Farmland to be converted shall be set aside prior to the commencement of any development activity.

Significance After Mitigation. ~~Mitigation is not available for~~Mitigation Measure AG-1 would not fully compensate for the impact related to conversion of ~~62~~ 30-31 acres of Prime and Statewide Importance Farmland to a non-agricultural use. Therefore, this impact would ~~be less than~~ significant ~~and unavoidable~~after mitigation.and unavoidable.

Impact AG-2 In the near term, development facilitated by the proposed project could minimally increase the potential for compatibility conflicts between ongoing agricultural operations and non-agricultural uses. However, in the long term, the elimination of agricultural activity from the project site would eliminate this potential conflict. Impacts related to the agriculture/urban interface would be Class III, *less than significant*.

Development facilitated by the proposed project would be located near ongoing agricultural operations and could result in conflicts for both urban and agriculture interests. The proposed General Plan amendments would involve land use re-designations of eight parcels within the ~~111.8~~139-acre project area. The land use designations for ~~three~~ all of one parcel~~s~~ and part of another parcel would be changed from Agriculture to Commerce, the land use designations for two parcels would be changed from Specific Plan to Commerce, the land use designations for two parcels would be changed from Industry to Commerce, and the land use designation for one parcel would change from Agriculture to Industry. Portions of three parcels would be changed from Agriculture to Parks & Open Space and a portion of one parcel would be changed from Open Space under the County to Parks & Open Space.

The proposed commercial, industrial, and manufacturing uses could include development of high-intensity human uses onsite. In the near term, the presence of agricultural activity on the project site (Parcel 10) could present various conflicts with such uses, including health concerns related to pesticide use and dust from the operation of farm equipment. Odors and noise associated with farming operations could also adversely affect urban uses. Development adjacent to farmland can also induce a range of adverse impacts on continued farm operations, such as vandalism to farm equipment or fencing, theft of products, and littering on farmland.

As discussed in the *Setting*, the Right-to-Farm ordinance protects normal farming operations against nuisance claims and frivolous lawsuits involving legal and accepted farming practices. Odors and noise generated from agricultural operations would not be considered nuisances under the Right-to-Farm Ordinance. Moreover, the types of uses proposed (commercial and industrial) generally are not considered sensitive to the types of compatibility impacts that can be created by agricultural activity.

In the long term, implementation of the proposed project would be expected to reduce the potential for conflicts agricultural-urban by converting the one remaining agricultural operation on the project site (on Parcel 10) to a non-agricultural use. Once the project site is built out, the nearest remaining agricultural activity would be approximately 2,000 feet to the west along both sides of Olivas Park Drive.

Based on the above, impacts related to compatibility conflicts between agricultural and non-agricultural uses would not be significant. In the long term, there would be a reduction in the potential for such conflicts.

Mitigation Measures. Impacts would not be significant; therefore, mitigation is not required.

Significance After Mitigation. Impacts related to conflicts between agricultural and non-agricultural uses would be less than significant without mitigation.

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 under the City of Ventura 2005 General Plan would include the addition of approximately 8,300 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 500,000 square feet of hotel development.

As discussed in the 2005 General Plan FEIR, this cumulative development would convert an estimated 674 acres of important farmlands, including 520 acres of Prime farmland, 138 acres of "Statewide Importance" farmland, and 16 acres of "Unique" farmland. This would incrementally contribute to the loss of farmland throughout the County and the state. The proposed project would incrementally add to that significant cumulative impact. While~~, but~~ proposed mitigation would ~~compensate for~~reduce the project's impact, ~~. Therefore,~~ the project's impact is ~~not~~ still considered cumulatively considerable and therefore a significant, and unmitigable, cumulative impact (Class I).

4.3 AIR QUALITY

This section addresses the proposed project's impact upon local and regional air quality. Both temporary impacts relating to construction activity and long-term impacts associated with growth in vehicle traffic are discussed. This section is based partially on analysis in the Initial Study (see Appendix A).

4.3.1 Setting

The physical and regulatory air quality setting of the area is described in detail in the Ventura County Air Quality Management Plan (AQMP) and the *Ventura County Air Quality Assessment Guidelines* (October 2003). These documents are incorporated by reference and are available for review at the Ventura County Air Pollution Control District (VCAPCD) at 669 County Square Drive, Ventura, California 93003 and at the City of Ventura Community Development Department at 501 Poli Street, Ventura. Information regarding air quality is also available online at the VCAPCD's web site (www.vcapcd.org). The following summarizes information from the AQMP and other pertinent materials.

a. 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. These predominant wind patterns are occasionally broken during the winter by storms coming from the north and northwest and by episodic Santa Ana winds, which 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, with nearly all precipitation occurring between October and April.

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. Ozone (O_3) is the primary air pollutant of concern during

the subsidence inversions, while carbon monoxide (CO) and nitrogen oxides (NO_x) are of greatest concern during winter inversions.

b. Characteristics and Effects of Key Pollutants. Air pollution is potentially hazardous to health and can diminish the production and quality of many agricultural crops, reduce visibility, degrade soils materials, and damage vegetation. Human health effects are the key determinant in the establishment of the above listed primary air quality standards. The health and safety effects of air pollutants are described in detail in the VCAPCD AQMP. The following provides a summary of key pollutants of concern in the South Central Coast Air Basin.

Carbon Monoxide. Carbon monoxide, a colorless, odorless, poisonous gas, is a local pollutant that in high concentrations is found very near the source. Carbon monoxide is a by-product of fuel combustion, but is generally not a concern with typical residential stationary sources (gas water and space heaters, gas dryers) since these are required by law to be properly vented. Automobile traffic is a major source of carbon monoxide with elevated concentrations usually 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.

Nitrogen Oxides. Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant, but at typical atmospheric concentrations, it is only potentially irritating. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_X) and reactive organic gases (ROG). NOx and ROG are often referred to as ozone precursors. NOx is formed during the combustion of fuels, while reactive organic gases are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, concentrations exceeding state and federal standards occur primarily between the months of May and October. Ozone is a pungent, colorless toxic gas with potential 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. Particulate matter refers to small, airborne particles that can be inhaled by humans and other animals. The two categories of particulate matter of greatest concern are PM_{10} and $PM_{2.5}$. PM_{10} is small particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly composed of dust particles, nitrates, and sulfates, and are a by-product of fuel combustion and wind erosion of soil and unpaved roads. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be very

different. PM_{10} generally comes from windblown dust, dust kicked up from mobile sources, and dust created by crushing, grinding, or abrading surfaces during grading operations or other means by which large particles are broken into smaller ones. $PM_{2.5}$ is generally associated with combustion processes and motor vehicle exhaust, especially from diesel engines. NOx, which is a component of diesel exhaust, is a $PM_{2.5}$ precursors. $PM_{2.5}$ can also be formed in the atmosphere as a secondary pollutant through chemical reactions.

According to recent community epidemiological studies, adverse health effects associated with both short-term and long-term exposure to fine particles include increased premature deaths, primarily in the elderly and those with heart or lung disease; aggravation of respiratory and cardiovascular illness, leading to increased hospital visits; lung function problems and symptoms similar to chronic bronchitis especially in children and asthmatics; increased work and school absences; and alteration in lung tissue structure and respiratory tract defense mechanisms.

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, it was determined that 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 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 cancers per one million population could be expected if diesel PM concentrations remained the same.

c. Local Regulatory Framework. The federal and state governments have been empowered by the federal and state Clean Air Acts (CAA) to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (ARB) is the state equivalent in the California Environmental Protection Agency. Local control in air quality management is provided by the ARB through county-level Air Pollution Control Districts (APCDs). The ARB 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 15 air basins statewide. The project site is located in the South Central Coast Air Basin and is within the jurisdiction of the Ventura County APCD (VCAPCD).

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 (PM_{10} and $PM_{2.5}$), and lead (Pb). Primary standards are those levels of air quality deemed

necessary, with an adequate margin of safety, to protect public health. In addition, California has also established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards. Table 4.3-1 lists the current federal and state air quality standards.

Table 4.3-1
Current Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	---	0.09 ppm (180 µg/m^3)
	8-Hour	0.075 ppm (147 µg/m^3)	0.070 ppm (137 µg/m^3)
Carbon Monoxide	8-Hour	9.0 ppm (10 µg/m^3)	9.0 ppm (10 µg/m^3)
	1-Hour	35.0 ppm (40 µg/m^3)	20.0 ppm (23 µg/m^3)
Nitrogen Dioxide	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)
	1-Hour	100 ppb (188 µg/m^3)	0.18 ppm (339 µg/m^3)
Sulfur Dioxide	Annual	---	---
	24-Hour	---	0.04 ppm (105 µg/m^3)
	1-Hour	75 ppb (196 µg/m^3)	0.25 ppm (655 µg/m^3)
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
	Calendar Quarter	1.5 µg/m^3	---
	3-Month Average	0.15 µg/m^3	---

ppm = parts per million
µg/m^3 = micrograms per cubic meter
Source: CARB, June 2012

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 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.

c. Current Ambient Air Quality. The VCAPCD monitors air pollutant levels throughout Ventura County to assure that the above air quality standards are met and, in the event that they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." Ventura County is designated as "in attainment" for all State and federal standards, except for the State 1-hour and 8-hour ozone standards, the federal 8-hour ozone standard, and the state PM_{10} and $PM_{2.5}$ standards.

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.

Monitoring stations are located approximately 3.5 miles to the northeast of the project site (El Rio Mesa station) and approximately 7 miles to the northwest (Ventura station). The El Rio Mesa station is downwind of the project site, and the Ventura station is upwind of the project site. Both stations monitor ozone; however, only the El Rio Mesa station monitors PM_{10} and $PM_{2.5}$. Table 4.3-2 lists air quality data for the El Rio and Ventura monitoring stations for the 2009-2011 period.

As shown in Table 4.3-2, hourly ozone concentrations at the El Rio monitoring station exceeded state standards once during 2009. The 8-hour average ozone concentrations at this station exceeded state standards once during 2009 and 2010, and exceeded federal standards once during 2009. Also, as shown in Table 4.3-2, hourly ozone concentrations at the Ventura monitoring station exceeded the state standard once in 2010. The 8-hour average concentrations at this station did not exceed the state or federal standards during 2009-2011. At the El Rio Mesa station, 24-hour PM_{10} concentrations exceeded state standards twice during 2009 and once each year in 2010 and 2011, but did not exceed the federal standard during 2009-2011. Emissions of $PM_{2.5}$ did not exceed federal standard between 2009 and 2011 at the El Rio Mesa station.

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 developed during the preparation of AQMPs and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to the CARB 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 has designated Ventura County a "serious nonattainment" area for the 8-hour ozone standard. This means that Ventura County must meet the national 8-hour ozone standard by June 15, 2013. The VCAPCD released the Final 2007 AQMP in May 2008. The 2007 AQMP presents new control measures intended to bring the County into compliance by the 2013 date. The 2007 AQMP emission factors based its population forecasts on the 2008 Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

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 national 8-hour ozone standard

and continued progress to the state ozone standard will come from the CARB'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.

Table 4.3-2
Ambient Air Quality Data

Pollutant	2009	2010	2011
[a]Ozone, ppm - maximum hourly concentration (ppm)	0.099	0.083	0.081
Number of days of state exceedances (>0.09 ppm)	1	0	0
Number of days of federal exceedances[1]	--	--	--
[b]Ozone, ppm - maximum hourly concentration (ppm)	0.080	0.098	0.065
Number of days of state exceedances (>0.09 ppm)	0	1	0
Number of days of federal exceedances[1]	--	--	--
[a]Ozone, ppm - maximum 8 hour average concentration (ppm)	0.077	0.073	0.069
Number of days of state exceedances (>0.07 ppm)	1	1	0
Number of days of federal exceedances (>0.075 ppm)	1	0	0
[b]Ozone, ppm - maximum 8 hour average concentration (ppm)	0.067	0.069	0.060
Number of days of state exceedances (>0.07 ppm)	0	0	0
Number of days of federal exceedances (>0.075 ppm)	0	0	0
[a]Particulate Matter <10 microns, maximum 24 hour concentration in g/m^3	99.9	61.5	51.7
Number of samples of state exceedances (>50 g/m^3)	2	1	1
Number of samples of federal exceedances (>150 g/m^3)	0	0	0
[b]Particulate Matter <10 microns, maximum 24 hour concentration in g/m^3	n/a	n/a	n/a
Number of samples of state exceedances (>50 g/m^3)	n/a	n/a	n/a
Number of samples of federal exceedances (>150 g/m^3)	n/a	n/a	n/a
[a]Particulate Matter <2.5 microns, maximum 24 hour concentration in g/m^3	19.7	21.4	18.3
Number of samples of federal exceedances (>35 g/m^3)	0	0	0
[b]Particulate Matter <2.5 microns, maximum 24 hour concentration in g/m^3	n/a	n/a	n/a
Number of samples of federal exceedances (>35 g/m^3)	n/a	n/a	n/a

Source: CARB, Annual Air Quality Data Summaries available at http://www.arb.ca.gov/adam/. Accessed February 5, 2013.
[a] El Rio Monitoring Station.
[b] Ventura Monitoring Station.
n/a = not available (this pollutant is not measured at this station).
[1] The national 1-hour ozone standard was revoked in June 2005 and is no longer in effect.

f. 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. There

are no sensitive receptors in the vicinity of the proposed project. The sensitive receptor population closest to the project site is Del Rio Norte Elementary School, located about 0.5 miles east of the project site on the east side of the Santa Clara River.

4.3.2 Impact Analysis

a. Methodology and Significance Thresholds. Based on Appendix G of the *CEQA Guidelines*, air quality impacts would be considered significant if the project would:

> *Conflict with or obstruct implementation of the applicable air quality plan.*
> *Violate any air quality standard or contribute substantially to an existing or projected air quality violation.*
> *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).*
> *Expose sensitive receptors to substantial pollutant concentrations.*
> *Create objectionable odors affecting a substantial number of people.*

As identified in the Initial Study (see Appendix A), the proposed project would not result in conflicts with the AQMP. While the proposed project would require General Plan amendments and zone changes, it would not result in the construction of any residential units. Therefore, it would not cause an increase in population that would exceed SCAG projections. Further analysis of AQMP consistency is not warranted.

Similarly, the Initial Study determined that the project area does not include sensitive land uses that are particularly sensitive to the effects of air pollutants, such as schools, hospitals, and daycare centers, and is in an area characterized primarily by commercial and industrial land uses. Further study of this issue is not warranted.

Finally, the Initial Study identified that no odor-sensitive receptors are located in the project site vicinity and no component of the project would be expected to generate objectionable odors that would affect people. No further analysis of objectionable odors is warranted.

The analysis of the proposed project's air quality impacts follows the guidance and methodologies recommended in the *Ventura County Air Quality Assessment Guidelines* (October 2003), which 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 jeopardize attainment of the federal ozone standard and thus have a significant adverse impact on air quality. As outlined in the Air Quality Assessment Guidelines, the proposed project's impact would be significant if it would generate daily emissions exceeding 25 lbs of reactive organic compounds (ROG) or nitrogen oxides (NO_X). The VCAPCD's 25 lbs per day thresholds for ROG and NO_X are not intended to be applied to construction emissions since such emissions are temporary. For construction impacts, the VCAPCD recommends minimizing fugitive dust through dust control measures.

The VCAPCD has not established quantitative thresholds for particulate matter. However, the VCAPCD requires minimizing fugitive dust through various dust control measures as documented in Rule 55, *Fugitive Dust*, which applies to any project capable of generating fugitive dust. Rule 55 contains measures to reduce fugitive dust emissions, both from construction and operation of projects. Rule 55 applies to any operation, disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

Construction and Operational Emissions Estimates. The California Emissions Estimator Model (CalEEMod, v. 2011.1.1) software was used to calculate emissions estimates. When project specific information was not available, default assumptions were used to calculate area, energy, and mobile source emissions associated with the project. The number of vehicle trips used to estimate air pollutant emission impacts is from the EIR traffic study, prepared by Associated Transportation Engineers (December, 2012) (Appendix F).

Carbon Monoxide "Hot Spot" Analysis. According to the Ventura County *Air Quality Assessment Guidelines*, a CO screening analysis should be conducted for intersections that would be significantly affected by a proposed project and that experience, or are anticipated to experience, level of service (LOS) E or F. Such intersections have the potential to create CO "hot spots," locations where local ambient CO concentrations exceed the State or Federal ambient air quality standards. Implementation of mitigation measures recommended in the Section 4.9, *Traffic and Circulation*, would improve traffic at most study area intersections to acceptable service levels, and a CO screening analysis would not be required at these intersections; however, the U.S. 101 Highway Southbound Ramps / Johnson Drive intersection would remain at ~~an unacceptable level of service~~LOS E and would therefore require CO screening analysis.

b. Project Impacts and Mitigation Measures.

Impact AQ-1 Project construction would generate temporary air pollutant emissions of ozone precursors ROG and NO_X, 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*, the project involves extension of Olivas Park Drive and construction of a new levee. In addition, the project would rezone parcels within the project site to allow development of a maximum of about 1,258,000 square feet of commercial development, and 75,000 square feet of industrial development.

Construction of both the road / levee and future site development would generate temporary air pollutant emissions due to the use of heavy construction equipment and potential generation of fugitive dust. For the purpose of this analysis, construction of the proposed roadway extension and levee and associated emissions of ozone precursors (ROG and NO_X) and dust (PM_{10}) were assumed to occur periodically over a period of approximately 8 months. As future development of commercial or industrial uses on the project site is not currently proposed, the likely

construction timing for future commercial and industrial uses within the project area is speculative; therefore default construction phase lengths provided within the CalEEMod software were used and maximum anticipated emissions resulting from each phase of construction are provided. The modeling analysis assumed default construction equipment. Construction-related emissions are shown in Table 4.3-3.

Table 4.3-3
Maximum Daily Construction Emissions (lbs/day)

Phase	ROG	NO_X	PM_{10}
Roadway Extension and Levee			
Site Preparation	14.37	127.65	89.82
Grading (2013)	11.97	97.58	11.13
Grading (2014)	11.34	90.75	10.72
Paving	5.78	32.17	2.94
Future Commercial and Industrial Development			
Site Preparation	10.01	80.09	13.53
Grading	11.92	97.58	13.28
Building Construction	9.91	63.40	10.43
Paving	3.56	21.68	1.66
Architectural Coating	281.20	1.93	1.28

See Appendix B for CalEEMod Results.

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 CalEEMod modeling in Appendix B, diesel exhaust emissions would be a maximum of 5.89 pounds per day of PM_{10} and $PM_{2.5}$. Additionally, there are no identified sensitive receivers in the vicinity of the project site and these emissions would be temporary. Therefore, impacts associated with potential TACs emissions would be less than significant.

As noted above, the VCAPCD does not classify construction impacts as significant because of their temporary nature. Although construction-related impacts are temporary, implementation of standard controls would ensure that impacts remain 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 ROG 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.

Implementation of these standard conditions required by the City of Ventura on all project site construction (including both the road extension / levee and future onsite commercial and

industrial development), in combination with implementation of VCAPCD Rule 55, *Fugitive Dust*, would reduce construction related air quality impacts to less than significant.

Mitigation Measures. Assuming implementation of standard City and VCAPCD requirements, mitigation would not be required.

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

Impact AQ-2 Operational emissions of ROG and NO_X associated with anticipated maximum development potential of the project area would exceed VCAPCD thresholds. However, these impacts are mitigable with incorporation of emissions reduction measures and payment of Air Quality Mitigation Fund fees. Therefore, the project would have a Class II, *significant but mitigable,* impact to regional air quality.

Neither the proposed roadway extension nor the proposed levee would generate operational air pollutant emissions. However, potential future commercial and industrial development on the project site would generate long-term operational emissions due to increased traffic and energy use. Maximum daily operational emissions of ozone precursors ROG and NO_X were estimated based on the anticipated maximum development potential of the project site and the estimated number of project-generated vehicle trips resulting from such development. As discussed in Section 2.0, *Project Description*, the ~~111.8~~139-acre area could accommodate a maximum of about 1,258,000 square feet of commercial development, and 75,000 square feet of industrial development. Vehicle trips are discussed in detail in Section 4.9, *Traffic and Circulation.*

Vehicular and non-vehicular operational related impacts for potential future commercial and industrial development were analyzed using CalEEMod. Table 4.3-4 summarizes operational emissions resulting from potential maximum future development (modeling results are contained in Appendix B).

Emissions associated with the operation of future development on all 14 properties that make up the project site would exceed the 25 lbs/day VCAPCD significance threshold for ROG by about 147 lbs/day and would exceed the threshold for NO_X by about 172 lbs. Therefore, impacts would be potentially significant unless mitigation is incorporated. It should be recognized, however, that these thresholds are typically applied to individual development projects whereas buildout of the project site involves multiple individual developments on 14 individual properties.

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 in excess of VCAPCD thresholds through implementation of regional air quality programs. The fee is based on a formula developed by the VCAPCD and included in the VCAPCD'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.

Table 4.3-4
Daily Operational Emissions from
Potential Maximum Future Development

Emissions Source	Emissions (lbs/day)	
	ROG	NO_X
Area	37.0	<0.1
Energy	0.1	1.1
Mobile	135.1	196.0
Unmitigated Total	**172.2**	**197.1**
Threshold	*25*	*25*

Source: CalEEMod v.2011.1 summer modeling results (modeling results contained in Appendix B).

Mitigation Measures. The following mitigation measure would reduce air pollutant emissions associated with future development of individual project site parcels.

AQ-2 Energy and Transportation Related Emission Reduction. Future project site developers shall prepare project-specific air quality studies to determine if their proposed development would generate emissions exceeding the 25 lbs/day VCAPCD significance threshold. Project-specific air quality emissions reports may be completed as stand-alone studies or may be incorporated into required CEQA analysis of individual projects. Applicants of development projects determined to exceed the 25 lbs/days threshold shall implement one or more of the following in order to reduce emissions of ROG and NOx to 25 lbs/day or less.

Energy Efficiency. The commercial and industrial structures proposed for development within the project area shall be designed to increase energy efficiency 20 percent 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.

Transportation Demand Management Plan. The applicant shall prepare and implement an on-site Transportation Demand Management (TDM) Plan. In the course of completing the environmental evaluation, the TDM Plan will be reviewed by, and must meet the requirements of, the City Planning Department.

Air Quality Mitigation Fund. For any remaining emissions above 25 lbs/day after other mitigation measures are implemented, 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 project area. 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 potential future development on the project site. Payment of Air Quality Mitigation Fund fees by individual project site developers at the time their properties are developed would mitigate the impacts to a less than significant level. The total fee estimate per parcel would be calculated using the current inflation rate at time of development and methodologies described in Ordinance 93-37.

Impact AQ-3 Increased traffic congestion associated with anticipated maximum development potential of the project area would potentially increase carbon monoxide (CO) concentrations at congested intersections. However, CO concentrations are forecast to remain within federal and state standards. Therefore, impacts relating to CO "hot spots" would be Class III, *less than significant*.

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is in attainment of state and federal CO standards and has been for several years. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection and maintenance programs. In the South Central Coast Air Basin, the maximum 8-hour average CO level recorded in 2011 was 1.9 parts per million (ppm), approximately one-fifth of the 9 ppm state and federal 8-hour standard.

Although CO is not expected to be a major air quality concern in Ventura County over the planning horizon, elevated CO levels can occur at or near intersections that experience severe traffic congestion. A project's localized air quality impact is considered significant if the additional CO emissions resulting from the project create a "hot spot" where the California 1-hour standards of 20.0 ppm or the 8-hour standard of 9 ppm is exceeded. This typically occurs at severely congested intersections. According to the VCAPCD's Air Quality Assessment Guidelines, screening for possible elevated CO levels should be conducted for severely congested intersections experiencing levels of service E or F with project traffic where a significant project traffic impact would occur. ~~The VCAPCD's response to the Notice of of Preparation also suggested conducing analysis at intersections at LOS D.~~ Significant impacts were identified at two study intersections: Victoria Avenue / Olivas Park Drive (forecast to operate at LOS D / E without mitigation) and Johnson Drive / U.S. Highway 101 Southbound Ramps (forecast to operate at LOS E / F without mitigation). Implementation of mitigation

recommended in the Section 4.9, *Traffic and Circulation*, would address the potential project impact at the Victoria Avenue / Olivas Park Drive intersection; however, because the LOS may remain at E at ~~a significant project impact may remain at~~ U.S. 101 Highway Southbound Ramps / Johnson Drive; therefore, CO analysis is required at that intersection.

The U.S. 101 Highway Southbound Ramps / Johnson Drive intersection was analyzed for CO hotspots using the CALINE4 modeling program in accordance with Caltrans' Transportation Project CO Protocol Manual (revised 1997). Impacts related to CO concentrations are considered significant if the additional CO from a project would result in CO concentrations in excess of either the California one-hour standard (20.0 ppm) or the eight-hour standard (9 ppm).

The CALINE4 model uses emissions factors generated using ARB's Mobile Source Emissions Inventory (EMFAC2011, updated January 2013). A reasonable worst-case CO emissions factor was developed based on emissions factors from the EMFAC2011 model using VMT data from light, medium and heavy duty vehicles in Ventura County and average vehicle speeds of 5 miles per hour. In order to provide a conservative estimate of maximum CO concentrations at sensitive receptors near the intersection, CO emissions from traffic traveling along the U.S. Highway 101 bridge (at 65 miles per hour) was also included in the analysis.

The CALINE4 model results indicate that the worst-case 1-hour CO concentration at a receptor located approximately 10 meters from the center of the intersection (the approximate location of the nearest sidewalk locations to the intersection) would be 2.5 ppm, which is below the California 1-hour standard of 20 ppm. Note that 1.9 ppm of the total concentration represent the maximum ambient CO concentration, and 0.6 ppm of the total concentration represents the contribution from vehicle traffic traveling through the intersection (refer to Appendix B for the CALINE4 model output). Therefore, the project would not result in traffic congestion at intersections such that an exceedance of CO standards would occur. This impact would be less than significant.

Mitigation Measures. Impacts would be less than significant and mitigation would not be 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 standards for PM_{10} and $PM_{2.5}$. 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 in Section 4.3.2.(a), above, the proposed project would not cause an increase in population that would exceed SCAG projections, and would not conflict with the AQMP. Consequently, although emissions associated with the vehicle trips generated by development associated with the proposed project (under a maximum buildout scenario) 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, with mitigation, the proposed project's contribution to cumulative air quality impacts would not be cumulatively considerable.

4.4 BIOLOGICAL RESOURCES

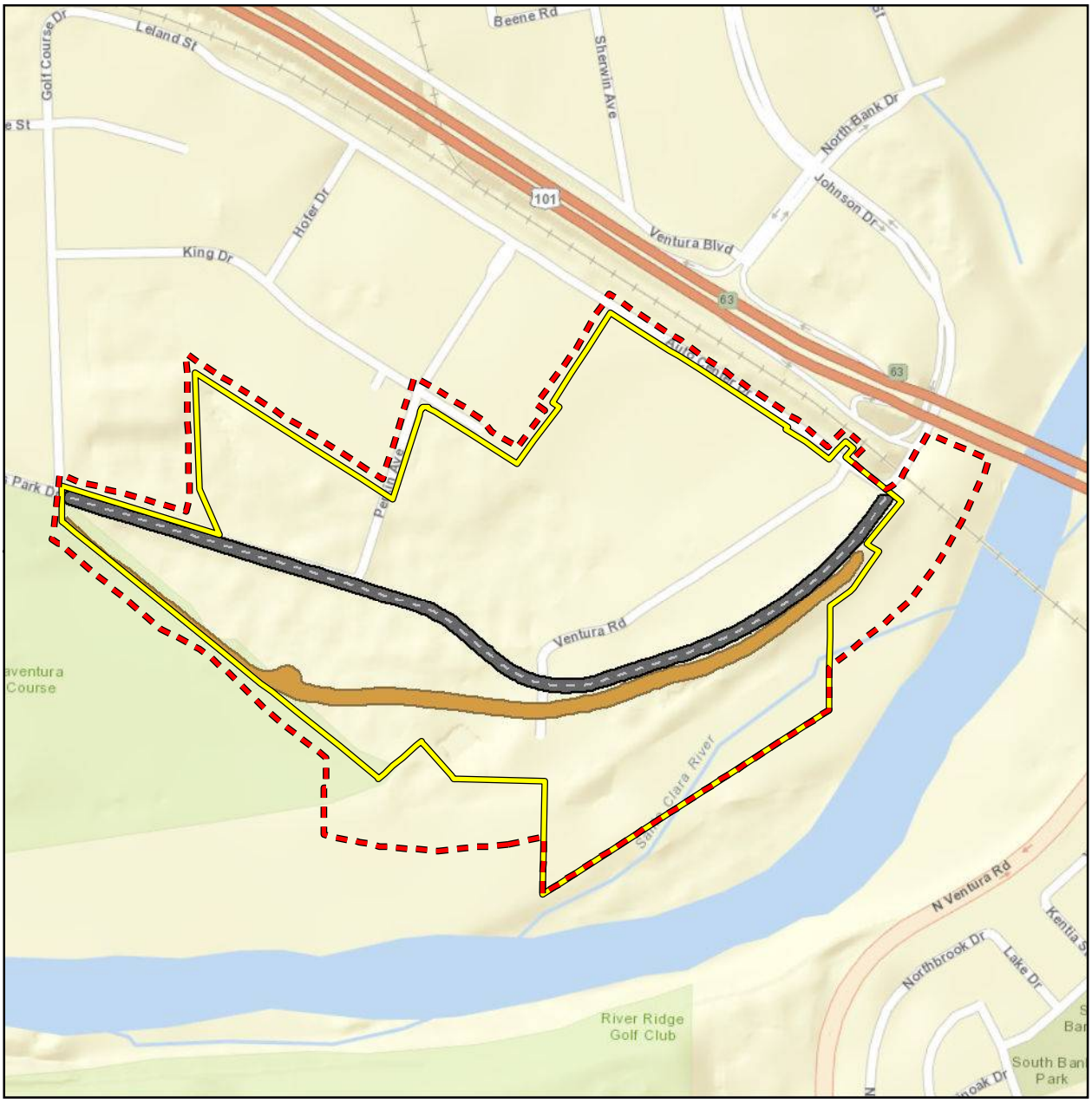
This section analyzes the proposed project's impacts to biological resources, including special status species and sensitive habitats.

4.4.1 Setting

The project site is relatively level and is located in the western portion of the Santa Clara River Valley, situated in the Oxnard Plain. Current and historic land uses include agricultural production, the Montalvo Community Service District (MCSD) wastewater treatment plant, and recreational, residential, and commercial development in surrounding areas. The site has been significantly altered and disturbed by urbanization, road construction, and a constructed earthen berm within the upland terrace adjacent to the northwestern side of the Santa Clara River. A system of constructed agricultural drainages collect urban storm flows from north of the site, and route them to a detention basin in the western portion of the site. The northeast portion of the site is bounded by U.S. Highway 101, the Union Pacific railway line, and associated bridge structures. The southwestern portion of the site lies adjacent to the Buenaventura Golf Course. The Santa Clara River is located on the east side of the project site, and is the dominant hydrologic feature within the project area. The river discharges into the Pacific Ocean approximately 4.6 river miles southwest of the Highway 101 Bridge. A side channel that conveys surface water through a constructed drainage that parallels Highway 101 discharges into the project area approximately 0.2 miles southwest of Highway 101. The concrete outfall structure for this side channel, which is known as Moon Ditch, is approximately 60 feet wide, with standing water at the outfall point at the time of the below mentioned survey efforts. Sensitive biological resources are present within and adjacent to the ~~111.8~~139-acre project site, primarily near the northwest bank of the Santa Clara River.

Reconnaissance level field surveys were conducted by Rincon Consultants, Inc. (Rincon) on September 4, 2009, November 21, 2010, and January 6, 2012 to generally document significant biological resources. During these field surveys, Rincon determined the "biological study area" (herein referred to as the "study area") encompassing the project site and adjacent biological areas that may be affected indirectly by the proposed project (Figure 4.4-1). Rincon conducted a habitat assessment of the study area, recorded all plant and wildlife species observed or detected within the study area, and photographed the biological resources of the study area. Habitats were evaluated to determine their potential to support special status species. Rincon further conducted an evaluation of potentially jurisdictional waters and wetlands within the study area on February 9 and 13, 2012. A follow-up site visit was conducted on January 31, 2013 to confirm that site conditions and significant biological resources had not changed since February 2012. Biological resources reported in the City of Buenaventura's Draft EIR for the previously proposed Olivas Park Drive Extension Project (Impact Sciences, Inc., 1996) are included herein as historical background information for the study area.

a. Flora. The plant species observed by Rincon biologists during reconnaissance level field surveys in 2009, 2010, and 2012 were recorded and are listed in Appendix C. Additional species observed within and adjacent to the project site by Impact Sciences in 1995, as reported in the 1996 Draft EIR, have also been included in this list.



Project Boundary
Study Area
Roadway
Levee

0 400 800 Feet

Biological Resources
Survey Study Area

Figure 4.4-1

b. Vegetation Communities. The primary natural/semi-natural plant communities that occur within the study area include Ruderal, Mulefat Thickets/Scrub, Arroyo Willow Scrub, and Fremont Cottonwood Forest.. These plant communities are classified and described according to the second edition of the *Manual of California Vegetation* (Sawyer et al., 2009). Other land types within the study area include golf course, detention basin and agricultural ditches, paved roads, agriculture (active and fallow), developed/structures, and concrete bank. These plant communities and land use types are summarized in Table 4.4-1 with their respective acreage within the study site and project site, and are mapped in Figure 4.4-2. Representative photographs are provided in Appendix C. The natural/semi-natural plant communities observed and mapped are also discussed in further detail below.

Table 4.4-1
Acreages for Natural Plant Communities and Man-Made Land Uses Within the Study Area and the Project Site

Vegetation Community	Study Area (Acres)	Project Site (Acres)
Natural Plant Communities		
Ruderal	29.2	23.3
Fremont Cottonwood Forest	9.2	~~0.1~~9.2
Mulefat Scrub	4.9	0.5
Mulefat Thickets	4.6	0.0
Arroyo Willow Scrub	2.3	~~0.0~~2.3
Mulefat Scrub (disturbed)	2.0	0.0
Man-Made Land Uses		
Agriculture	60.2	57.1
Developed/Structures	38.3	26.5
Paved Roads	11.1	8.0
Golf Course	4.6	0.0
Agricultural Ditch	1.7	1.7
Concrete Bank	1.6	1.0
Berm (Ruderal)	1.4	0.4
Detention Basin	1.2	1.2
Total	**172.2**	**~~119.8~~131.2 ***

***** *Includes existing paved roads*

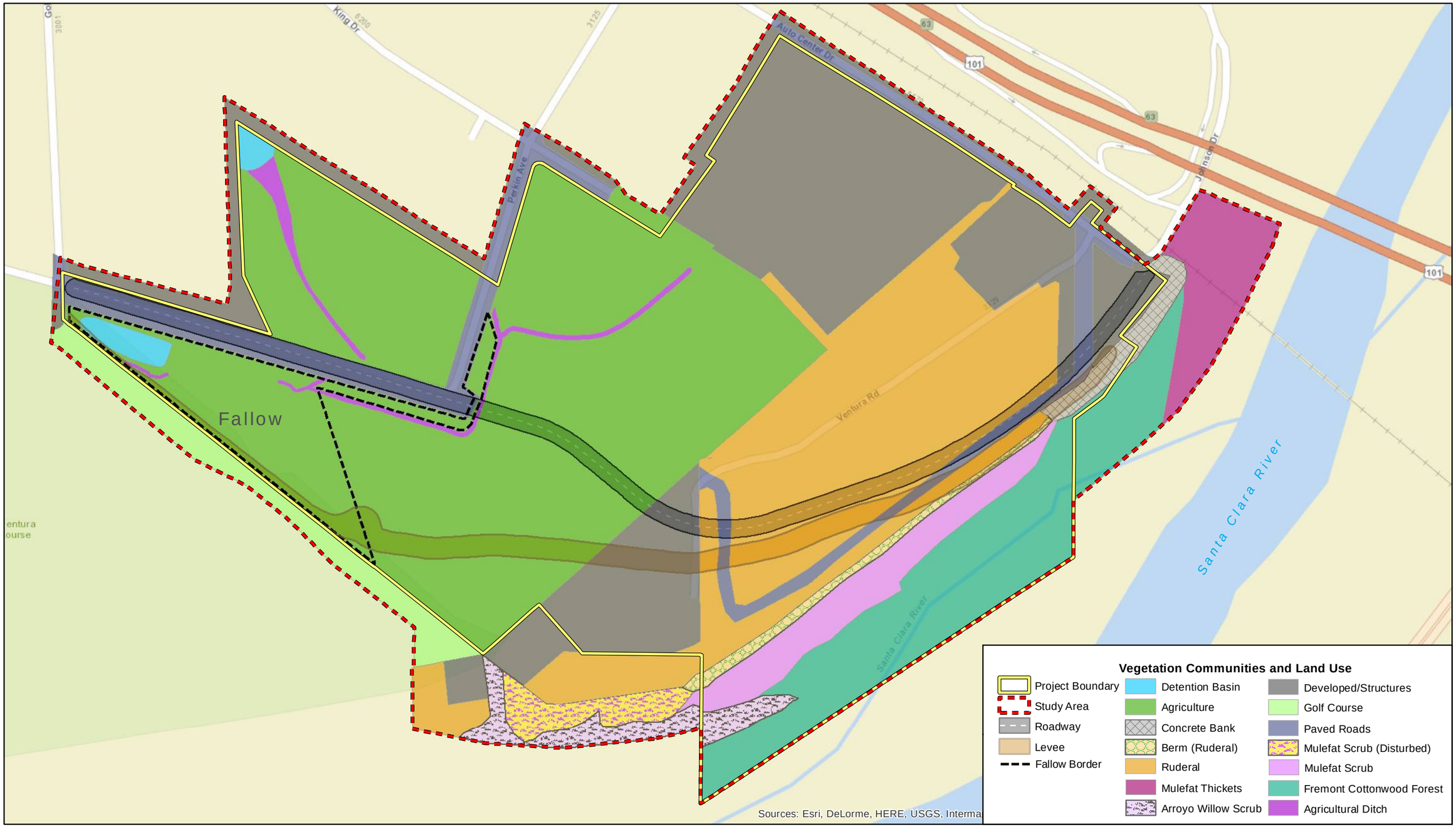
Ruderal is a plant community that is typically in early successional stages as a result of a severe human disturbance or recurrent natural disturbance. This plant community is dominated by annual and perennial, introduced/non-native, pioneering, herbaceous plants that readily colonize disturbed ground. Ruderal grassland that is left undisturbed can typically undergo succession towards more stable, less weedy, plant communities. Ruderal communities are located primarily within the open field adjacent to the Santa Clara River between the MMID to the southwest and the industrial area in the northeast corner of the study area. Ruderal

communities within the project site are significantly disturbed and are not dominated by one species in particular, and could not be classified as a specific alliance described by Sawyer et al. (2009). Instead, this community includes a general mix of introduced species such as: Russian knapweed (*Acroptilon repens*), black mustard (*Brassica nigra*), tocalote (*Centaurea melitensis*), brome grasses (*Bromus* spp.), Bermuda grass (*Cynodon dactylon*), red-stem filaree (*Erodium cicutarium*), sweet fennel (*Foeniculum vulgare*), summer mustard (*Hirschfeldia incana*), prickly wild lettuce (*Lactuca serriola*), cheeseweed (*Malva parviflora*), white horehound (*Marrubium vulgare*), prickly ox-tongue (*Picris echioides*), wild radish (*Raphanus sativus*), and Russian thistle (*Salsola tragus*). Ruderal vegetation occupies 30.6 acres of the study area, including the ruderal vegetation associated with the manmade berm currently along part of the length of where the levee is proposed. A total of 23.7 acres of this habitat occurs within the project site.

Mulefat Thickets (*Baccharis salicifolia* Shrubland Alliance) is dominated by mulefat (*Baccharis salicifolia*) (Sawyer et al., 2009). Mulefat Thickets form a dense scrub canopy over a sparse herbaceous layer. This alliance occurs in canyon bottoms, floodplains, irrigation ditches, lake margins, and stream channels in mixed alluvium soils at elevations between sea level and 4,100 feet above mean sea level. Mulefat Thickets occurs in both seasonally and intermittently flooded habitats, and stands area inherently variable depending on the amount of inundation and scouring. This alliance occurs as small stands in the Santa Clara River portion of the subject study area. Associate species include arroyo willow (*Salix lasiolepis*), giant reed (*Arundo donax*), cocklebur (*Xanthium strumarium*), and mugwort (*Artemisia douglasiana*).

Three variations of this alliance were observed within the study area: Mulefat Thickets, Mulefat Scrub, and Mulefat Scrub (Disturbed). Mulefat Scrub differs from Mulefat Thickets in that this community forms a more intermittent canopy and includes more transitional associate species, such as California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), poison oak (*Toxicodendron diversilobum*), alkali heliotrope (*Heliotropium curassavicum*), and western ragweed (*Ambrosia psilostachya* var. *californica*). Mulefat Scrub occurs along the northwestern edge of, and just upland from the Santa Clara River channel. Mulefat Scrub (Disturbed) differs from Mulefat Thickets (discussed above) in that this community forms an intermittent canopy, but is disturbed as part of the berm maintenance, includes more ruderal associate species, such as castor bean (*Ricinus communis*), poison hemlock (*Conium maculatum*), sweet fennel (*Foeniculum vulgare*), tree tobacco (*Nicotiana glauca*), white horehound (*Marrubium vulgare*), and white sweetclover (*Melilotus alba*). Mulefat Scrub (Disturbed) also occurs along the northwestern edge of the Santa Clara River. These three mulefat communities occupy 11.5 acres of the study area. A total of ~~0.5~~2.8 acres of Mulefat Scrub occurs within the project site boundary in the eastern portion of the site.

Arroyo Willow Scrub (*Salix lasiolepis* Shrubland Alliance) is dominated by arroyo willow (*Salix lasiolepis*) (Sawyer et al., 2009). Arroyo willow is a tall shrub or tree up to 26 feet in height that occurs on seasonally or intermittently flooded sites at elevations below 7,120 feet. Arroyo Willow Scrub form an intermittent to continuous canopy within the Santa Clara River portion of the study area. Important associate species observed within the study area include giant reed *(Arundo donax*), red willow (*Salix laevigata*), sandbar willow (*Salix exigua*), and mulefat (*Baccharis salicifolia*). Arroyo Willow Scrub occupies 2.3 acres within the southern portion of the study area~~, but does not occur~~ and within the project site boundary.



Imagery provided by ESRI and its licensors © 2013.

0 225 450 Feet

Vegetation and Land Use

Figure 4.4-2

Fremont Cottonwood Forest (*Populus fremontii* Forest Alliance) is dominated by Fremont cottonwood (*Populus fremontii*). To be classified as this alliance, Fremont cottonwood is required to contribute only a minimum of 5% cover in the tree layer (Sawyer et al., 2009). This alliance occurs on floodplains, along low-gradient rivers, along perennial or seasonally intermittent streams, and springs at elevations up to 7,875 feet. Fremont cottonwood forest within the study area forms an open canopy within the Santa Clara River portion of the study area. Fremont cottonwood was observed growing with California sycamore (*Platanus racemosa*) and growing above willow species in the lower tree/shrub stratum. The ground layer includes associate species such as those mentioned above for Mulefat Thickets and Arroyo Willow Scrub. Fremont cottonwood forest occupies 9.2 acres of the study area. ~~A total of 0.1 acres~~All 9.2 acres of this habitat community also occurs within the project site boundary in the eastern portion of the site.

c. Wildlife and Fish Habitats. The various natural, ruderal, agricultural, and developed habitats in the project area support a wide variety of reptiles, birds, amphibians, mammals, and fish. The relatively undisturbed native mulefat, willow, and cottonwood communities associated with the Santa Clara River are expected to support the widest variety of species. This riparian zone is expected to be used as a connective corridor by various species of wildlife occurring within the greater Santa Clara River habitat zones. Species expected to likely occur within these habitats include, but are not limited to, western skink (*Eumeces siltonianus*), alligator lizard (*Elgaria multicarinatus*), California newt (*Taricha torosa*), black-bellied slender salamander (*Batrachoseps nigriventris*), ensatina (*Ensatina eschscholtzii*), western toad (*Bufo boreas*), chorus frog (*Pseudacris cadaverina* and *P. regilla*), horned lizard (*Phrynosoma coronatum*), red-tailed hawk (*Buteo jamaicensis*), common yellowthroat (*Geothlypis trichas*), California thrasher (*Toxostoma redivivum*), yellow warbler (*Setophaga petechial*), least Bell's vireo (*Vireo bellii pusillus*), song sparrow (*Melospiza melodia*), northern Bryant's woodrat (*Neotoma bryanti intermedia*; formerly San Diego desert woodrat, *Lepida intermedia*), and bobcat (*Lynx rufus*). A number of common mammal species may also utilize the abutting ruderal habitat edges, including opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), skunk (*Mephitis mephitis*), and coyote (*Canis latrans*).

The Santa Clara River channel and its tributaries (e.g. the Moon Ditch outflow channel) within the project area provide suitable habitat for a number of aquatic and semi-aquatic species. These could include but are not limited to, arroyo chub (*Gilia orcuttii*), Santa Ana sucker (*Catostomus santaanae*), mosquitofish (*Gambusia affinis*), threespine stickleback (*Gasterosteus aculeatus aculeatus*), two-striped garter snake (*Thamnophis hammondii),* and western pond turtle (*Emys marmorata*). The wastewater treatment ponds associated with the MMID, detention basins, and agricultural ditches also provide limited habitat for a limited number of water associated species, particularly birds.

The ruderal, fallow-agricultural, and active agricultural communities would support a more limited number of upland species that are more tolerant of these historically and actively disturbed areas. Species that may be observed within these habitats would include, but not be limited to, western fence lizard (*Sceloporus occidentalis*), side blotched lizard (*Uta stansburiana*), California horned lark (*Eremophila alpestris*), house finch (*Carpodacus mexicanus*), lesser goldfinch (*Carduelis psaltria*), white-tailed kite (*Elanus leucurus*), burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), Botta's pocket gopher (*Thomomys bottae*), Audubon

cottontail (*Sylvilagus audubonii*), California ground squirrel (*Otospermophilus beecheyi*), and house mouse (*Mus musculus*).

The developed portions of the project site would support the fewest and least diverse species. However, a number of bird species are expected to occur there, such as rock pigeon (*Columba livia*), black phoebe (*Sayornis nigricans*), common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), barn swallow (*Hirundo rustica*), northern mockingbird (*Mimus polyglottos*), California towhee (*Melozone crissalis*), and Cooper's hawk (*Accipiter cooperii*). Wildlife species observed by Rincon biologists in 2009, 2010, and 2012 and by Impact Sciences in 1995 (as per the 1996 Draft EIR) are listed in Appendix C, as are representative habitat photographs.

d. Regulatory Setting. Federal, state, and local authorities under a variety of legislative acts share regulatory authority over biological resources. The primary authority for general biological resources lies within the land use control and planning authority of local jurisdictions, in this instance, the City of Ventura. Other agencies with the responsibility for protection of biological resources within the project site includes the U.S. Army Corps of Engineers (USACE; wetlands and other waters of the United States), Regional Water Quality Control Board (RWQCB; waters of the State), U.S. Fish and Wildlife Service (USFWS; federally listed species and migratory birds), and California Department Fish and Wildlife (CDFW; riparian areas and other waters of the State, state-listed species). CEQA provides a mechanism through which biological resources must be considered in the decision-making process regarding land use by the local authority. Additional regulatory information is provided in Appendix C.

Regulated or sensitive resources studied and analyzed herein include special status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, locally protected resources such as protected trees, and resources protected by approved conservation plans. Regulated or sensitive resources were evaluated during the literature review and assessed during field reconnaissance surveys, as described below.

e. Special Status Species Definitions. In response to their legislative mandates, regulatory authorities have designated sensitive biological resources to include those specific organisms that have regionally declining populations such that they may become extinct if population trends continue. Habitats are also considered sensitive biological resources if they support concentrations of special status plant or wildlife species, are of relatively limited distribution, are of particular value to wildlife, and/or are particularly susceptible to disturbance.

Special status biological resources are those defined as follows: (1) species that have been given special recognition by federal, state, or local resource agencies and environmental organizations due to limited, declining, or threatened population sizes; (2) species and habitat types recognized by local and regional resource agencies as special status; (3) habitat areas or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; and (4) wildlife corridors and habitat linkages. Regulated biological resources may or may not be considered special status, but are regulated under local, state, and/or federal laws. In order to qualify as a "special status species," a species must meet one or

more of the following criteria: federal or state listed, proposed, or candidate endangered (FE / SE) or threatened (FT / ST); state rare (SR); fully protected (FP) or species of special concern (SSC) according to the CDFW; monitored by the California Natural Diversity Database (CNDDB); and / or plant species on the California Native Plant Society (CNPS) List. Additional special status information and definitions are provided in Appendix C.

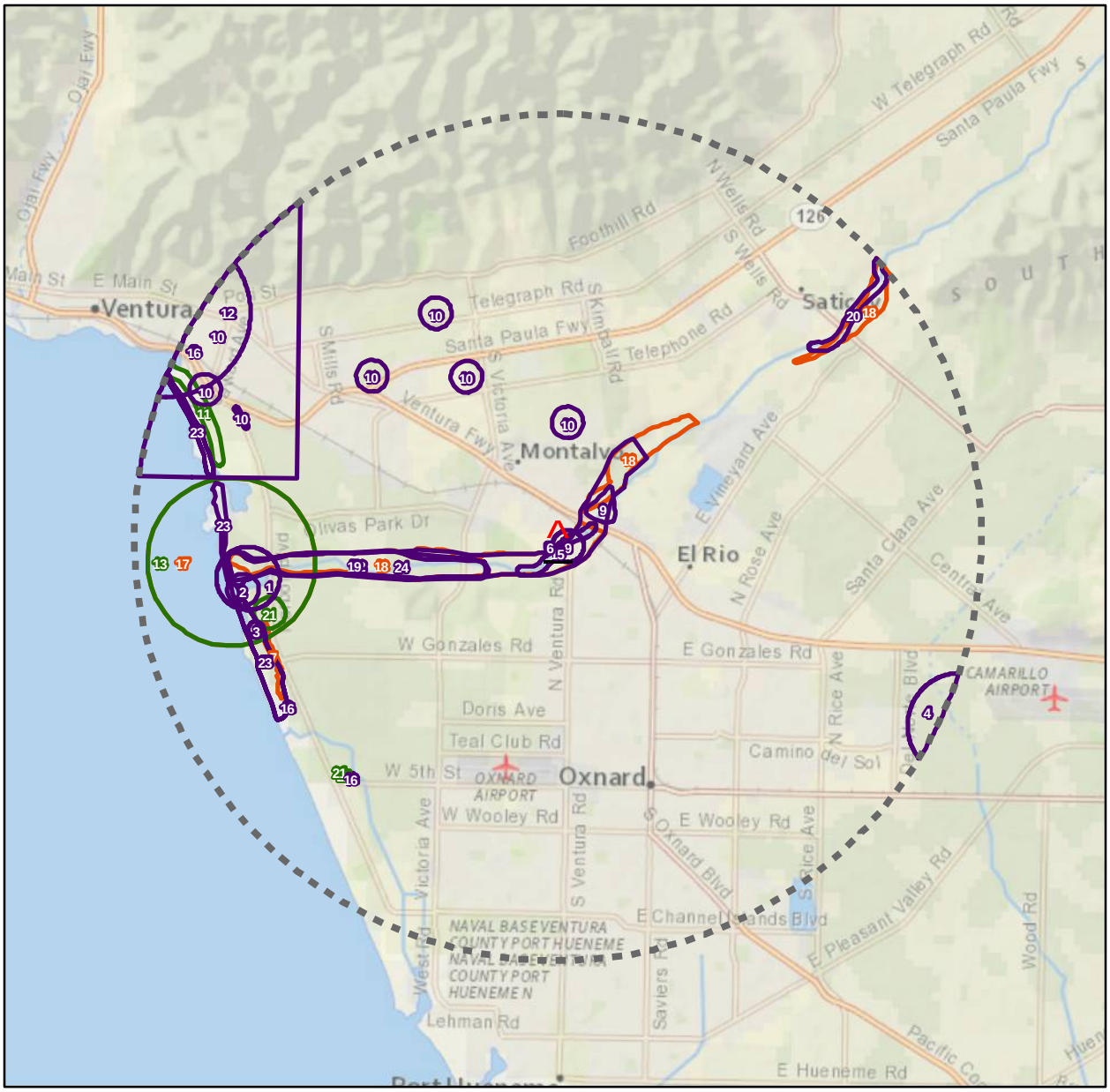
f. Special Status Biological Resources. This section lists special status biological resources that were observed, are reported, and have the potential to occur within the study area. The potential for occurrence of special status resources is based on site characteristics, the species' known regional distribution, and habitat affinities of the species.

In addition to the reconnaissance level field surveys of the project area in September 2009, November 2010, and February 2012, Rincon conducted a literature search as part of the analysis for special status biological resources. Rincon searched the CNDDB (CDFW, 2013) for the area within a five-mile-radius of the project site (Figure 4.4-3). This database search was conducted to account for sensitive elements (e.g. special status species and habitats) reported to CDFW in the area and with potential to occur at the project site. A literature search of CNPS *Inventory of Rare and Endangered Plants of California* (CNPS, 2001, 2013), CDFW's *Special Animals List* (CDFW, 2011), and CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW, 2013) were also conducted to account for other special status species not tracked by CNDDB with potential to occur in the vicinity of the proposed project site. Additional resources used to characterize the site include review of United States Geological Survey (USGS) topographic maps and *Soil Survey of Ventura County* (NRCS, 1970).

Special Status Plant Species. Based on a review of the available literature, three special status plant species are known to occur within approximately five miles of the project site, although none are tracked within the project site. These include Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), salt-marsh bird's beak (*Chloropyron [=Cordylanthus] maritumum* ssp. *maritimum*), and Orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*). These species are listed as CRPR 1B species, and Ventura marsh milk-vetch and salt-marsh bird's beak are listed as State and Federally Endangered. Ventura marsh milk-vetch and salt-marsh bird's beak occur within salt marsh conditions, and Orcutt's pincushion occurs within coastal bluff scrub or coastal dunes. No suitable habitat for these species occurs within the project site and no other special status plant species are expected to occur onsite. No special status plant species were observed by Rincon or Impact Sciences (1996).

Special Status Wildlife Species. Based on a review of the available literature, 18 special status wildlife species that are listed as Federal and / or State Threatened or Endangered, or State Fully Protected or Special of Special Concern, are known to occur within approximately five miles of the project site and have the potential to occur on site (Appendix C). Suitable habitat for the majority of these species is limited to the riparian and scrub habitats located within and adjacent to the east side of the site.

Seven of these species are listed Threatened or Endangered: Santa Ana sucker (*Catostomus santaanae*; FT / SSC), tidewater goby (*Eucyclogobius newberryi*; FE / SSC), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*; FE / SE / FP), southern steelhead – Southern California ESU (*Oncorhynchus mykiss irideus*; FE / SSC), western yellow-billed cuckoo (*Coccyzus*



Basemap: National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, iPC
California Natural Diversity Database, October, 2012. Additional suppressed records reported by the CNNDB known to occur or potentially occur within this search radius include: Ventura Marsh Milk-Vetch. For more information please contact the Department of Fish and Wildlife.

1 - bank swallow
2 - Belding's savannah sparrow
3 - burrowing owl
4 - California horned lark
5 - California least tern
6 - coast horned lizard
7 - Coastal and Valley Freshwater Marsh
8 - globose dune beetle
9 - least Bell's vireo
10 - monarch butterfly
11 - Orcutt's pincushion
12 - pallid bat
13 - salt marsh bird's-beak
14 - sandy beach tiger beetle
15 - Santa Ana sucker
16 - silvery legless lizard
17 - Southern Coastal Salt Marsh
18 - Southern Riparian Scrub
19 - tidewater goby
20 - unarmored threespine stickleback
21 - Ventura Marsh milk-vetch
22 - western pond turtle
23 - western snowy plover
24 - western yellow-billed cuckoo

Sensitive Elements Reported by the California Natural Diversity Database

Figure 4.4-3

americanus occidentalis; Federal Candidate / SE), southwestern willow flycatcher (*Empidonax traillii extimus*; FE / SE), and least Bell's vireo (*Vireo bellii pusillus*; FE / SE). All three of these fish species, plus the Arroyo chub (*Gila orcuttii*; SSC), are or have been known to occur within the active channel of the Santa Clara River east of the project site. However, they are considered to have a low potential to occur within the project boundary due to the marginal suitable habitat that is limited to and associated with the Moon Ditch culvert outfall area, which eventually discharges to the river. The tidewater goby likely only has the potential to occur this far inland during periods of high flow and exceptional high tides. Suitable nesting and foraging riparian habitat exist on and adjacent to the site along the Santa Clara River for the three listed avian species. Due to the extent of available habitat, ~~both the southwestern willow flycatcher and~~ least Bell's vireo are considered to have a moderate to high potential to occur. Due to the more limited amount of suitable habitat preferred and available to southwestern willow flycatcher, this species is considered to have moderate potential to occur. Western yellow-billed cuckoo have not been recorded within the region since 1942, and so are considered to have a low potential to occur on site or within the project vicinity.

Ten of the remaining 11 species listed as FP or SSC are either known to occur on site or are considered to have a high to moderate potential to occur. White-tailed kite (*Elanus leucurus*; FP) are known to occur on site and several individuals have been observed each survey foraging throughout the ruderal and agricultural habitats in the central and eastern portion of the project site. Trees suitable for nesting and roosting occur primarily within the Santa Clara River habitat to the east of the site. However, it is possible that kites could utilize the windrow trees associated with the golf course along the southern project boundary, or those in the central north portion of the site between the ruderal and development areas. Burrowing owl (*Athene cunicularia*; SSC) were observed overwintering on site in 2012 in the eastern ruderal and northwestern agricultural areas. The species is no longer known to breed within the greater Ventura / Oxnard area, but the possibility cannot be completely ruled out. Suitable foraging habitat and the fossorial mammal burrows necessary for this species are located throughout most of the ruderal, fallow agriculture, active agriculture, and agricultural ditches on site. These habitats are also suitable foraging habitat for loggerhead shrike (*Lanius ludovicianus*; SSC), which was observed in 2012 along the southern project boundary between the golf course and the fallow agricultural area. Suitable nesting habitat for shrike is primarily located in the eastern portion of the site within the mulefat scrub. Yellow-breasted chat (*Icteria virens*; SSC) and yellow warbler (*Setophaga petechial*; SSC) are known to occur within the Santa Clara River corridor during the nesting season and so are considered to have a moderate potential to occur within the riparian (warbler) and scrub (chat) habitats on the eastern side of the project site.

Suitable habitat for coast horned lizard (*Phrynosoma blainvillii*; SSC) occurs on the east side of the project site within the mulefat scrub habitat. A coast horned lizard was observed within this habitat in 1995 and along the ruderal berm in 2012. Silvery legless lizard (*Anniella pulchra pulchra*; SSC), two-striped garter snake (*Thamnophis hammondii*; SSC), and western pond turtle (*Emys marmorata*; SSC) are considered to have a moderate to high potential to occur within the riparian habitat associated Santa Clara River on the east side of the project site. Within the project boundary, this habitat is limited to the Moon Ditch culvert outfall area and adjacent riparian habitat. Western pond turtle were observed in project vicinity in 1995. Western pond turtles also utilize sandy banks or grassy open fields to lay their eggs. Nesting can occur up to 1000 feet from aquatic sites, but the majority of nests are located within 500-600 feet. Slope of

the nest sites range up to 60%, but most nests are on slopes <25%. Hatchlings require shallow water habitat in their first year with dense submergent or short emergent vegetation. Several areas with slopes suitable for nesting occur south and east of the existing and proposed road.

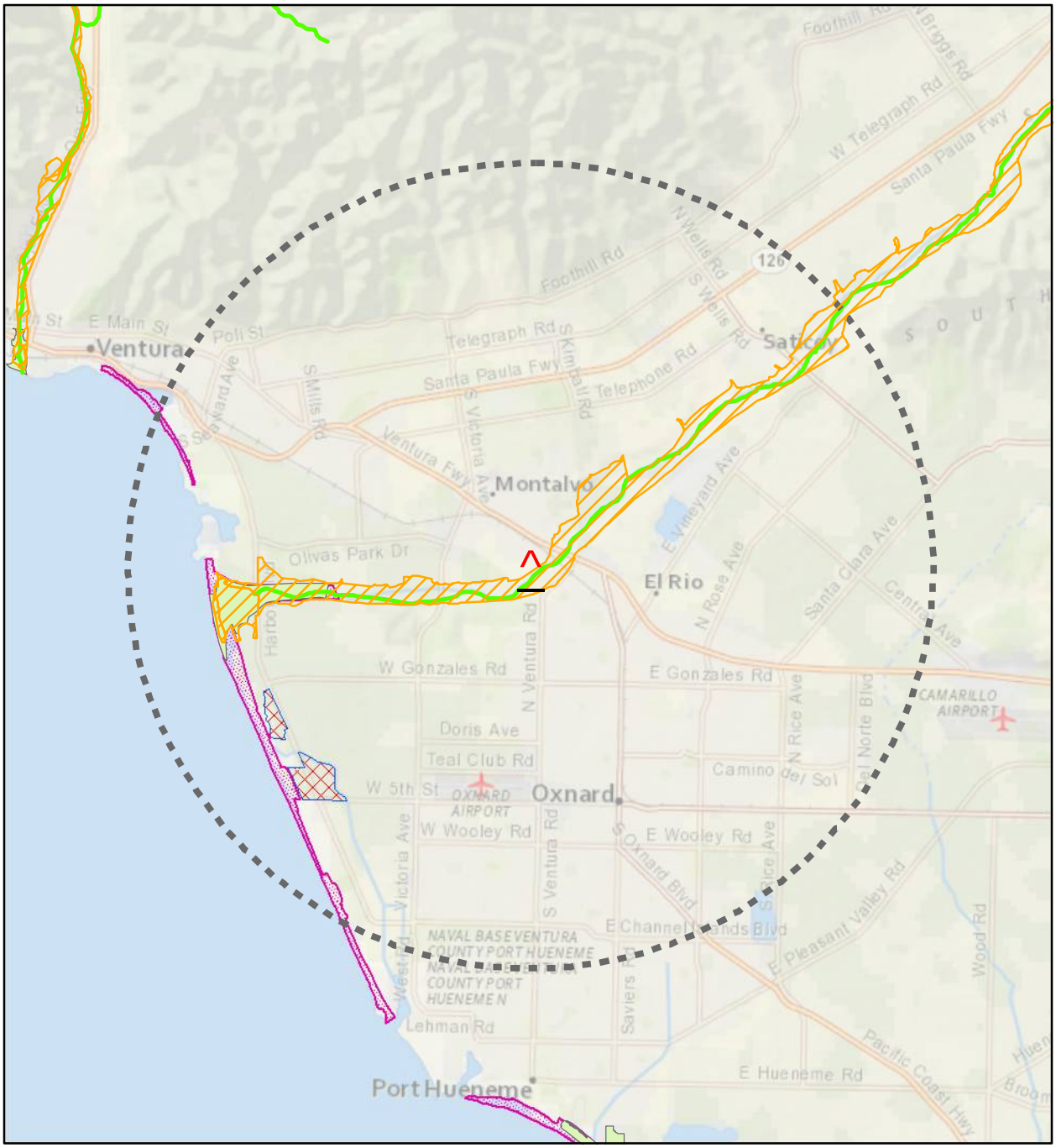
Northern Bryant's woodrat (*Neotoma bryanti intermedia;* formerly San Diego desert woodrat, *Lepida intermedia*; SSC) are considered to have a high potential to occur within the mulefat scrub and riparian habitat adjacent to the Santa Clara River. Focused small mammal trapping in 1995 verified the presence of this species adjacent (east) to the project site.

Raptors and Other Nesting Birds. Raptors (birds of prey), migratory birds, and other native avian species, and their nests are protected by the California Fish and Game Code (CFGC) 3503 and the Migratory Bird Treaty Act (MBTA). The project site contains suitable nesting habitat for a variety of bird species, including those that nest on the ground in more open, ruderal areas (e.g. horned lark, burrowing owl), on structures (e.g. black phoebe, barn swallow), within shrubby habitats (e.g. loggerhead shrike, California thrasher), or in trees (e.g. northern mockingbird, Anna's hummingbird). Trees suitable for nesting raptors (e.g. red-tailed hawk, Cooper's hawk, white-tailed kite, great-horned owl [*Bubo virginianus*]) primarily occur along southern and eastern site boundary and their adjacent habitats, and to a lesser extent, the windrow trees in the central north portion of the site between the ruderal and development. These and other raptor species are expected to forage primarily throughout the ruderal, fallow agricultural, and active agricultural habitats on site. Colonial nesting species such as great egret (*Ardea alba*), great blue heron (*Ardea herodias*), snowy egret (*Egretta thula*), and black-crowned night-heron (*Nycticorax nyticorax*) are known to forage throughout the open, semi-vegetated portions of the project site. However, no nesting or over-night rookery sites were observed on site or within the adjacent Santa Clara River habitat along the eastern project boundary.

Sensitive and Critical Habitats. The CNDDB identified three sensitive plant communities within a 5-mile radius of the project site: Coastal and Valley Freshwater Marsh (G3/S2.1), Southern Coastal Salt Marsh (G2/S2.1), and Southern Riparian Scrub (G3/S3.1; Figure 4.4-4). Of these, only southern riparian scrub occurs within and adjacent to the project site. This habitat (mapped as arroyo willow, mulefat, and cottonwood forest habitats, Figure 4.4-2, and described above) is located along the eastern portion of the project site and is associated with the Santa Clara River. This habitat is moderately diverse and dense and thus provides moderate to high quality habitat for species that are restricted to riparian scrub communities.

Designated critical habitat for two species occurs within the project vicinity: southern steelhead – Southern California ESU and southwestern willow flycatcher. Both of these habitats occur throughout the Santa Clara River habitat along the eastern portion of the project site. Steelhead are considered to have a low potential to occur on site due to the limited suitable aquatic habitat associated with the Moon Ditch culvert outfall area. Southwestern willow flycatcher are considered to have a moderate potential to occur due to the extent of suitable riparian habitat along the Santa Clara River. Neither species has been observed within the project site but their presence is assumed based on the designation of critical habitat within the river.

Jurisdictional Waters and Wetlands. A formal delineation of jurisdictional waters and wetlands within the study area was conducted by Rincon in February 2012. Jurisdictional resources detected on site and within the study area include the Santa Clara River and the



Basemap: National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, iPC U.S. Fish and Wildlife Service, February 2013. Critical habitat shown is that most recently available from U.S. FWS.

Project Location

5 Mile Buffer

Critical Habitat

- S Calif Steelhead FCH
- Tidewater Goby revised PCH (2011)
- Western Snowy Plover FCH
- Ventura Marsh Milk-Vetch FCH
- SouthWestern Willow Flycatcher FCH

0 1 2 Miles

Critical Habitat

Figure 4.4-4

Table 4.4-2
Potential Jurisdictional Areas within the Project Site and the Study Area

Type of Jurisdiction	Project Site (acres)	Study Area Boundary (acres)
USACE Jurisdiction		
Waters of the U.S. (riverine)	0.~~05~~07	3.20
Adjacent wetlands (riparian habitat)	~~0.03~~5.83	8.76
Total	**~~0.08~~5.90**	**11.96**
CDFW Jurisdiction		
Streambed	0.05	3.20
Riparian habitat (Santa Clara River)	~~0.27~~6.27	12.05
Other riparian habitat (agricultural drainages and basins)	2.99	2.99
Total	**~~3.31~~9.31**	**18.24**
RWQCB Jurisdiction		
Waters of the State (Santa Clara River)	0.08	11.96
Other surface waters (agricultural drainages and basins)	1.23	1.23
Total	**1.31**	**13.19**

Moon Ditch culvert outfall area on the east side of the project site, and several agricultural ditches and detention basins located in the central and western portions of the site (Table 4.4-2; Figure 4.4-5; Appendix C). The regulatory agencies make the final jurisdictional determination.

USACE Potentially Jurisdictional Areas. A total of ~~0.08~~5.90 acres of USACE jurisdiction exists within the project site and is associated with the Moon Ditch culvert outfall area on the east side of the site that discharges into the Santa Clara River, which is hydrologically connected to a Traditional Navigable Water (TNW; the Pacific Ocean). This includes ~~0.05~~0.07 acres of Waters of the U.S. subject to Clean Water Act (CWA) 404 jurisdiction and ~~0.03~~5.83 acres of adjacent wetlands subject to CWA 404 jurisdiction. Waters of the U.S. are located within Moon Ditch outfall area, which is a well-defined channel with a clear ordinary high water mark. Indicators of hydrologic flows include drift deposits, drainage patterns, in-stream ripples, shelving, and inundation. The adjacent wetlands include portions of the riparian vegetation (mulefat scrub and Fremont cottonwood forest) that also meet the hydric soil and hydrology criteria of a wetland as defined in the USACE *Arid West Supplement* (USACE, 2009). Indicators include recent fluvial deposits on the soil surface, oxidized rhizospheres in living roots, sandy soils with redox features and a dark surface, organic, loamy mucky mineral soils, or organic streaking in sandy soils.

The agricultural drainages and basins in the central and western portions of the site, which are the result of the land use in this portion of the site (agricultural and development runoff) do not

qualify as jurisdictional waters of the U.S., as these features lack evidence of a historic drainage and connectivity to a USACE jurisdictional feature.

RWQCB Potentially Jurisdictional Areas. The project site contains a total of ~~1.31~~6.13 acres of RWQCB jurisdiction. This includes all USACE jurisdiction (~~0.08~~5.90 acres) on the east side of the project site associated with the Mood Ditch culvert outfall area and described above. Additionally, isolated surface Waters of the State are present in the system of constructed drainage ditches and detention basin in the central and western portions of the project site (1.23 acres). These ditches collect urban storm flows from north of the site, and route them to the southwestern detention basin. This detention basin has an overflow outfall that discharges to a culvert that flows underground to the Santa Clara River. Examination of a historic USGS 7.5 minute topographic quadrangle for the Oxnard, California from 1949 (photo revised 1967) did not reveal any historic drainages in these areas.

CDFW Potentially Jurisdictional Areas. A total of ~~3.31~~9.31 acres of CDFW jurisdiction exists within the project site, including 0.05 acres of Streambed of the State, ~~0.27~~6.27 acres of riparian habitat associated with the Santa Clara River, and an additional 2.99 acres of riparian habitat associated with the afore mentioned constructed drainages and basins. The Streambed of the State corresponds to the Moon Ditch outfall channel, while the adjacent riparian vegetation (mulefat scrub and Fremont cottonwood forest) meet the definition of a continuous riparian canopy as defined by CDFW. This riparian jurisdiction extends beyond the USACE adjacent wetland area as continuous riparian canopy exists (but positive indicators of wetland soils and/or hydrology do not). Additional areas subject to CDFW jurisdiction on site includes the system of drainage ditches and detention basins in the central and western portions of the site.

Wildlife Movement. Wildlife movement occurs throughout the area, region and state. Wildlife utilize migration corridors, which usually connect one large habitat area with another, and while there is no pre-defined size limit for such areas, they most often are on the scale of mountain ranges, valleys, or clearly delimited ecological situations (i.e. vernal pools). The *Missing Linkages: Restoring Connectivity to California Landscape* conference (Penrod et al. 2001) refers to such corridors as "landscape linkages." Recent studies have been conducted to better understand relationships between animal populations, open space reserves, and natural movement patterns. The California Department of Transportation (Caltrans) and CDFW commissioned the California Essential Habitat Connectivity Project (Spencer et al., 2010) because a functional network of connected wildlands is essential to the continued support of California's diverse natural communities in the face of human development and climate change. The study mapped Essential Habitat Connectivity Areas, which are lands important to wildlife movement between large, mostly natural areas at the statewide scale.

According to the CDFW Biogeographic Information and Observation System, the Santa Clara River corridor falls within the Santa Monica – Sierra Madre Outer Boundary. The Santa Clara River offers one of the few continuous habitat linkages between coastal and inland natural areas and supports movement by larger mammals such as mountain lions (*Puma concolor*), black bear (*Ursus americanus*), mule deer (*Odocoileus hemionus*), and bobcat. This corridor would also support movement by numerous migratory bird species (e.g. least Bell's vireo, southwestern willow flycatcher, yellow warbler) and dispersing juveniles. It also serves as a migratory corridor to potential spawning habitat upstream for sea-run fish such as the southern steelhead

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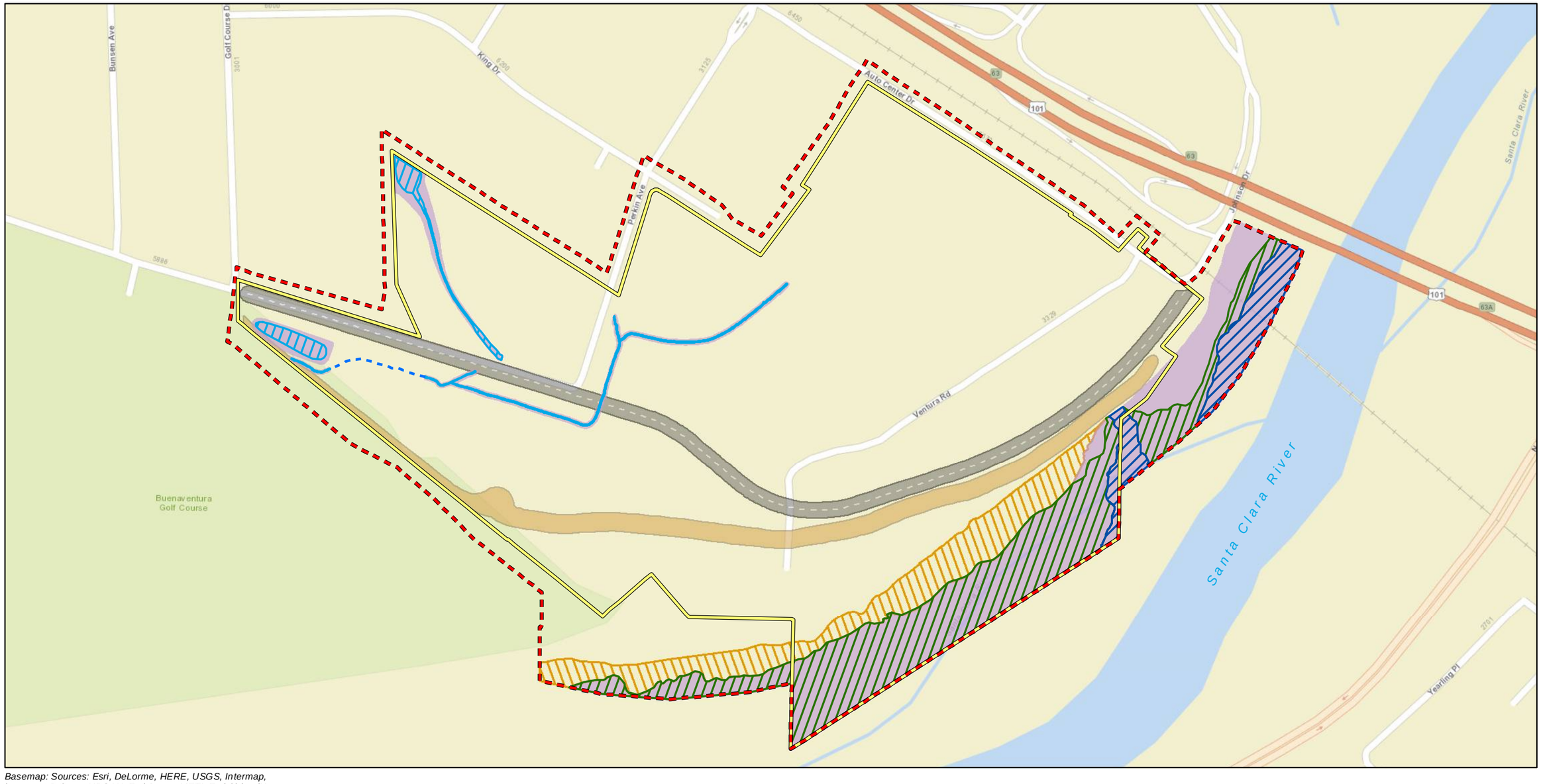

Basemap: Sources: Esri, DeLorme, HERE, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom

Legend

- Project Boundary
- Study Area
- Waters of the U.S. (USACE jurisdiction)
- Adjacent Wetlands (USACE jurisdiction)
- Roadway
- Levee
- CDFG Jurisdiction
- Other Surface Waters (RWQCB jurisdiction)
- Upland Terrace (coastal scrub vegetation-nonjurisdictional)
- Sheet Flow Area

0 225 450 Feet

Jurisdictional Areas and Wetlands

Figure 4.4-5

– Southern California ESU. Small mammals and reptiles may also use the river corridor and surrounding habitat for short range dispersal. The adjacent scrub and ruderal habitats provide important buffers to minimize and buffer against disturbances to the corridor. Due to the highly disturbed nature of the remainder of the site and surrounding areas to the south, west, and east, significant wildlife movement is not expected to occur outside the Santa Clara River corridor.

Projected Trees. Due to the highly disturbed nature of most of the project site, the number of trees occurring within the project site is fairly limited. Small stands and scattered individual ornamental trees exist throughout the developed portions of the project site. A windrow of planted ornamental trees also occurs in the central north portion of the site between the ruderal habitat and the adjacent development. Additionally, a row of *Eucalyptus* trees occur between the golf course and the agricultural area on the southwestern side of the project site. Native trees, such as California sycamore, black cottonwood (*Populus trichocarpa*), red willow, and arroyo willow are primarily restricted to the Santa Clara River riparian corridor on along the eastern project boundary.

Currently the City of Ventura does not have an adopted tree ordinance regulating native or nonnative tree impacts, removal, or mitigation requirements for development on either public or private lands. The Ventura City's Parks Division regulates all planting, pruning, and removal of trees in the public easement. This includes parkways, the space between the sidewalk and the curb, or areas where the sidewalk is adjacent to the curb and the easement is situated in the area between the house and the sidewalk. A no-cost permit must be obtained from the City to plant, prune, or remove any tree located in a parkway or easement. In addition, the City of Ventura is currently considering a Tree Protection Ordinance that would provide measures for protecting certain native tree species, such as California sycamore. If the ordinance were passed prior to the initiation of project activities, then impacts to certain native trees located on the east side of the site may require a permit and/or mitigation.

4.4.2 Impact Analysis

The following impact analysis examines the potential for the proposed project to directly and indirectly impact sensitive biological resources in the context of the significance thresholds defined below. Direct impacts typically involve the removal or modification of natural habitat that adversely affects plant and wildlife species dependent upon that particular habitat. Direct impacts may also result if individual plant or wildlife are specifically affected or harmed, which is typically considered for listed or protected species. Indirect impacts typically result from either short-term construction activities including noise or soil erosion, or long-term adverse effects resulting from adjacent urban development such as increased human and domesticated animal encroachment.

a. Significance Thresholds. CEQA, Chapter 1, Section 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 are assessed herein using impact significance criteria encompassing CEQA guidelines and federal, state and local plans, regulations, and ordinances. The *CEQA Guidelines,* Appendix G, provides the following general

statements to determine if significant impacts to biological resources could occur if a project action would:

> *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?;*
>
> *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies regulations, or by the CDFW or USFWS;*
>
> *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, or hydrological interruption, or other means;*
>
> *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;*
>
> *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and*
>
> *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

b. Project Impacts and Mitigation Measures. The proposed project includes construction of the Olivas Park Drive extension and a levee along the north side of the Santa Clara River. Land use and zoning changes are also proposed, which is expected to result in the future development of all land located north of the proposed levee (Figure 2-2). Based on current project plans, no direct project impacts will occur to the Moon Ditch culvert outflow area or the adjacent riparian habitat (i.e. Fremont cottonwood forest) during construction or project build-out. However, due to the extent of expected impacts from construction of the levee, roadway, and future developments, this analysis assumes 100% buildout of all other areas within the currently proposed project boundary. The mitigation measures contained herein are applicable regardless of the timing of disturbance activities within the project site boundary.

As discussed elsewhere in this EIR, the City of Oxnard is also planning the construction of a levee on the opposite (south) side of the Santa Clara River in the vicinity of the project site. Project impacts to biological resources discussed directly below consider construction of the north levee only. Impacts considering construction levee on the south river bank are considered in the cumulative impact analysis.

Impact BIO-1 The proposed project would result in the reduction of native plant communities and man-made habitats, which could affect special status and protected wildlife species. This impact would be Class II, *significant but mitigable*.

Construction of the proposed Olivas Park Drive extension, levee, and future project site developments would impact both native plant communities and man-made habitats where sensitive biological resources are known and have the potential to occur. Project grading and build-out could have a potentially substantial adverse indirect impact on special-status avian species and other native avian species protected under the MBTA and CFGC that utilize theses habitats for breeding and foraging. Direct impacts to breeding birds (adults and their nests) are also possible if construction activities were to occur during the bird breeding season. Short and long term indirect impacts to federal and state listed bird species, such as least Bell's vireo and southwestern willow flycatcher and which have the potential to occur within the riparian habitat of the Santa Clara River, would be potentially significant. As no riparian habitat (i.e. Fremont cottonwood forest) will be removed during project activities, no direct impacts to USFWS designated critical habitat for southwestern willow flycatcher would occur. Indirect impacts to western yellow-billed cuckoo are not considered likely, as the species has not been observed within the region since 1942.

A number of CDFW bird species of special concern are known or could use the native, disturbed, and man-made habitats throughout the project site, including burrowing owl, white-tailed kite, yellow-breasted chat, loggerhead shrike, and yellow warbler. Direct impacts to these sensitive avian species, and other native breeding birds, including raptors, would also be potentially significant. Due to the extent of similar disturbed habitats within the greater project region, the direct removal of these habitat and potential foraging or nesting areas types (57.1 acres agriculture, 26.5 acres developed, and 23.7 acres ruderal) due to project buildout would be less than significant. Removal of native habitat (i.e., 0.5 acres mulefat scrub) would be potentially significant

No native riparian habitat within or east of the project site would be removed during project build-out. However, short-term indirect effects to breeding and foraging avian species during construction could result from heavy equipment noise and dust during mass grading and construction activities. Long term indirect affects to adjacent habitats (specifically the riparian corridor) could result from increased noise (from vehicle traffic) and night lighting. Furthermore, a landscape plan palette has not been identified, but could include nonnative invasive species that would potentially expand their distribution beyond landscaped areas and could infringe upon the native riparian habitat, affecting the habitat's integrity. Intrusion into this native habitat by wildlife species typically associated with human development (e.g. cats, [*Felis catus*], dogs [*Canis lupus familiaris*], opossum, skunk, etc.) could also increase and affect avian and other native wildlife species. Additionally, impacted areas east of the levee after development would potentially be subject to erosion during storm events that could impact adjacent biological resources. Short-term indirect and potential long term impacts to sensitive avian species, and other sensitive resources, within the riparian river corridor would be potentially significant.

In addition to avian species, a number of other sensitive wildlife species are known or have the potential to occur within the riparian and adjacent scrub corridor, including the Moon Ditch culvert outflow area. Federal and state listed fish species with a low potential to occur at the Moon Ditch outflow include Santa Ana sucker, tidewater goby, unarmored threespine, and southern steelhead. Arroyo cub, a CDFW species of special concern, could also occur. Project build-out would not include any direct impacts to the culvert or outflow area. Therefore, direct

impacts to federal and state listed fish species are not expected. Short and long term indirect effects to aquatic areas could occur from erosion run-off or an increase in predator abundance in the area. No impacts to southern steelhead critical habitat are expected to occur as project activities are located completely outside of active channel of the Santa Clara River.

The riparian and adjacent scrub corridor also provides suitable habitat for several terrestrial and semi-aquatic CDFW species of special concern, including silvery legless lizard, coast horned lizard, western pond turtle, two-striped garter snake, and northern Bryant's woodrat. No direct impacts to riparian vegetation (i.e., Fremont cottonwood forest), which are adjacent to the Moon Ditch culvert within the project boundary, will occur. As such, no direct impacts to species expected to be associated with this habitat, including silvery legless lizard, western pond turtle, and two-striped garter snake, are expected. Direct impacts to coast horned lizard and northern Bryant's woodrat occurring within the mulefat scrub habitat, which is expected to be impacted during construction of the levee, could occur during levee construction. Direct impacts to western pond turtles and indirect impacts to suitable nesting habitat could occur during construction within upland areas immediately adjacent to the riparian corridor. However, the number of individuals expected to occur within the 0.5 acres of ~~this~~ these habitats that could be impacted is expected to be low and direct impacts to these individuals would not have a substantial adverse effect on these species populations, as defined by the CEQA Appendix G guidelines. Long term indirect impacts are expected to be minimal due to the small size and mobile nature of these species, which would be expected to disperse into the greater Santa Clara River corridor. As such, impacts to these species would be less than significant.

Mitigation Measures. To avoid project related construction impacts to listed and special status wildlife species and protected nesting birds, the following mitigation measures are required.

BIO-1(a) Pre-construction Special Status Wildlife Surveys and Construction Monitoring. Not more than one week prior to vegetation clearing and initial ground disturbance activities within the project site, focused preconstruction surveys for special status wildlife species shall be conducted by qualified biologists within the construction footprint and within a 200-foot survey buffer area. The surveys shall include mapping of current locations of special-status wildlife species for avoidance and relocation efforts and to assist construction monitoring efforts. CDFW species of special concern, which are not federally listed, shall be captured by qualified biologists, when possible, and relocated to adjacent appropriate habitat to the project area (at least 200 feet from the grading limits).

In addition, during any construction activities involving vegetation clearing or initial ground disturbance activities, the applicant shall contract with a biologist or biological consulting firm to conduct biological monitoring to avoid and minimize impacts to special status wildlife and protected nesting birds in the path of construction. Wildlife observed during construction activities shall be captured by qualified biologists, when possible, and relocated to

suitable habitat onsite at least 200 feet from the grading limits. If active woodrat nests are found during the peak nesting season (February 1 through May 31), a 50-foot radius buffer area shall be established around the nests and land clearing activities shall be postponed until the end of peak nesting season to protect the nest. Outside of the peak nesting season, nests shall be relocated under the direction of a qualified biologist. Nest material shall be carefully and slowly picked up to allow any woodrats to escape and placed in similar suitable habitat at least 100 feet from the project boundary.

CDFW shall be notified and consulted regarding the presence of any special status wildlife species found onsite during the preconstruction surveys or during biological monitoring. If a federally listed species is found prior to or during grading of the site, the USFWS shall also be notified. *Only a USFWS approved biologist shall be allowed to capture and relocate listed species.*

The methods and results of the preconstruction surveys and any relocation efforts during those surveys shall be documented in a brief letter report and submitted to the City no later than three weeks following the completion of the last survey. The methods and results of the biological monitoring and any relocation efforts conducted during construction shall be documented in a brief letter report and submitted to the City upon completion of vegetation clearance and initial ground disturbance activities.

BIO-1(b) Conduct Nesting Bird Surveys, Provide Establish Active Nest Avoidance Buffers, and Monitor Active Nests. Vegetation clearing, construction activities, grading activities, staging/mobilization activities (collectively, "development activities") shall avoid any nests of native birds. To the extent feasible, development activities shall be planned to avoid the breeding and nesting season (February 1 – August 31).

If the City determines that breeding season avoidance is not feasible, a qualified biologist shall conduct a minimum of three nesting bird surveys, within two weeks, and no more than three days prior to the start of vegetation or nesting habitat disturbance. Weekly bird nesting surveys shall be reinitiated if land clearing and disturbance activities are delayed for more than one week. The nesting bird survey area shall include a buffer around the grading limits of 500 feet. If an active bird nest is found, an appropriate buffer shall be established surrounding the nest(s) and shall be flagged for avoidance. The avoidance buffer shall be determined by the monitoring biologist based upon the species nesting and the activity being conducted. If an active nest of a special status bird

species is found, a suitable buffer area will be determined in coordination with CDFW / USFWS.

If active bird nests are found and avoidance buffers are established, construction work shall be delayed within these areas until after the nesting season or until the young are no longer dependent upon the nest site. Alternatively, construction within the buffer area may be conducted at the discretion of a qualified biological monitor. The biologist shall monitor the active nest(s) during initial disturbance activities and / or development activities to determine if the recommended avoidance buffers are adequate and that the nests are not being stressed or jeopardized

The methods and results of the nesting bird surveys, any nesting bird avoidance efforts as a result of those surveys, and the success of the avoidance buffers shall be documented in a brief letter report and shall be submitted to the City no later than three weeks following the completion of active nest monitoring activities.

BIO-1(c) Conduct Least Bell's Vireo and Southwestern Willow Flycatcher Surveys. Development activities within 500 feet of the Santa Clara River riparian corridor shall be avoided during the least Bell's vireo (April 10 to July 31) and southwestern willow flycatcher (May 15 to July 17) breeding season. If the City determines that breeding season avoidance is not feasible, a permitted biologist shall conduct focused presence / absence surveys in accordance with the USFWS protocols for least Bell's vireo (2001) and southwestern willow flycatcher (2003). Any survey methodology that deviates from these protocols shall be approved by the USFWS prior to initiation of the first survey. Surveys shall focus on riparian habitat associated with the Santa Clara River within the project site and adjacent suitable habitat out to 500 feet. Protocol surveys shall be conducted within one year of start of construction (i.e. breeding season prior to), and will continue annually until completion of construction activities if presence is documented in the first year. Documentation of findings, including a negative finding must be submitted to the USFWS for review. If neither species is detected, no further actions are required.

If least Bell's vireo or southwestern willow flycatcher are found nesting within the survey area, all project activities shall be halted within 500 feet of the nest site and territory for the remainder of the breeding season. The USFWS and CDFW shall be notified immediately. Should development activities within this zone be required during the breeding season, than additional consultation with USFWS and CDFW shall be required to establish suitable

monitoring procedures and buffers to ensure that "take" does not occur.

If "take" of least Bell's vireo or southwestern willow flycatcher is necessary to complete development activities, the applicant is required to obtain the applicable regulatory take permit(s). Compensatory mitigation, if necessary, would be determined in coordination with the wildlife agencies.

BIO-1(d) Conduct Burrowing Owl Surveys. A qualified biologist shall conduct preconstruction clearance surveys prior to ground disturbance activities within all suitable habitat to confirm the presence/absence of burrowing owls (maybe conducted concurrently with BIO-1(a)). The surveys shall be consistent with the recommended survey methodology provided by CDFW (2012). Clearance surveys shall be conducted within seven days prior to construction and ground disturbance activities. If no burrowing owls are observed, no further actions are required.

If burrowing owl are detected during the preconstruction clearance surveys, avoidance buffers will be implemented in accordance with the CDFW (2012) and Burrowing Owl Consortium (1993) minimization mitigation measures. Coordination with the CDFW by a qualified biologist shall occur to establish the appropriate avoidance buffer distances specific for the project's activities and level of expected disturbance.

If avoidance of burrowing owls is not feasible, a Burrowing Owl Exclusion Plan and Mitigation and Monitoring Plan will be developed by a qualified biologist in accordance with the CDFW (2012) and Burrowing Owl Consortium (1993). The Plan shall be approved by the applicable local CDFW office prior to implementation. A qualified biologist shall coordinate with the CDFW to determine the appropriate exclusion methods (passive or active relocation) for the project to relocate burrowing owls to a suitable offsite location. Relocation of owls can only occur during the non-breeding season.

BIO-1(e) Provide Restoration/Compensation for Impacts to Native Vegetation Communities. Development activities shall avoid the loss of native scrub habitat wherever feasible. Avoidance shall be achieved through fencing of areas to be protected with a minimum 50 foot buffer. No construction activities, equipment or materials staging, or any other construction related activities shall be allowed within the protected native scrub areas or the surrounding buffers.

Where avoidance is not feasible, the project applicant shall coordinate with the appropriate regulatory agencies, as necessary,

regarding appropriate compensation for replacement of lost habitat. Compensatory mitigation for impacts to native vegetation would be determined in coordination with the wildlife agencies (e.g. providing onsite habitat creation through a HMMP or offsite payment into an in-lieu fee program for loss of habitat).

BIO-1(f) Exclude Invasive Species. Final landscape design for developed areas shall be prepared by a qualified landscape architect such that project landscaping does not introduce invasive nonnative plant species into the vicinity of the project site. The plan shall be reviewed by a qualified botanist and approved by the City prior to installation of any plant materials.

BIO-1(g) Sensitive Resources Education. Prior to initiation of all development activities, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of all listed and sensitive resource issues on site and within the project area, as well as the general measures that are being implemented to protect these resources. A fact sheet covering these issues, as well as construction BMPs, shall be prepared by the developer for distribution to all contractors, their employees, and other personnel involved with construction of the project.

Significance After Mitigation. After successful implementation of the above mitigation measures, the level of significance for direct and indirect impacts to listed and special status wildlife species, their habitats, and protected nesting birds would be reduced to a less than significant level.

Impact BIO-2 Implementation of the proposed project could result in the loss of jurisdictional waters and wetlands. Impacts would be Class II, *significant but mitigable*.

No waters, wetlands, or riparian habitat associated with the Santa Clara River habitat around the Moon Ditch culvert outflow area on the east side of the project site are expected to be impacted by project build-out. Isolated drainages and wetlands in the central and western portions of the project site associated with agricultural ditches and basins are expected to be impacted by construction of the Olivas Park Drive extension and levee, as well as future commercial development of these areas (Figure 4.4-5). These ditches are expected to fall under the jurisdiction of both the CDFW and the RWQCB. Impacts to these features would include a SAA from the CDFW (for 2.99 acres) and a Waste Discharge Requirement (WDR) from the RWQCB (1.23 acres).

Mitigation Measures. The following measures are required to mitigate for direct and indirect effects to jurisdictional waters, wetland, and habitats. Permit acquisition is included below, but is not itself considered to be mitigation. The habitat avoidance and mitigation measures below will reduce the significance of impacts as required by CEQA, but the federal and state agencies issuing permits may require additional measures.

BIO-2(a) Riparian/Wetland Habitat Impact Avoidance. To the extent practicable, the project shall be designed to avoid impacts to the jurisdictional waters within the project area. The following avoidance / minimization measures are required:

Any material/spoils from project activities shall be located away from jurisdictional areas or sensitive habitat and protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.

Only the minimal amount of material needed for the project shall be stored. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.

Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned and any contaminated materials properly disposed of. For all spills the project foreman or designated environmental representative will be notified.

The extent of riparian/wetland vegetation/jurisdictional areas shall be shown on all project plans.

Riparian/wetland habitat adjacent to construction areas that will not be disturbed by the project shall be demarcated with highly visible orange construction fencing installed by the construction contractor under the guidance of a qualified biologist. The fencing shall be maintained throughout the duration of the project and shall be inspected weekly to ensure it is in proper working condition.

BIO-2(b) Secure Resource Regulatory Permits for Impacts to Jurisdictional Areas. If jurisdictional waters cannot be avoided, minimization measures shall be applied and all necessary resource agency permits shall be obtained. This includes a 401 Certification or WDR from the RWQCB and a SAA from CDFG.

BIO-2(c) Jurisdictional Habitat Mitigation. Prepare a Habitat Mitigation and Monitoring Plan (HMMP) that outlines a compensatory mitigation approach for the project in coordination with the RWQCB and CDFG. Impacts to jurisdictional waters shall be mitigated at a minimum 2:1 ratio. It is noted that the final mitigation ratio required by the RWQCB and CDFG for acquisition of regulatory permits may differ.

The HMMP shall identify portions of the site (potentially along the eastern edge of the levee adjacent to the Santa Clara River) that contain suitable characteristics (e.g. hydrology) for restoration and provide adequate acreage to compensate for the anticipated project impacts. It shall provide measurable performance criteria for

determining success of the mitigation effort and recommend remedial measures to ensure the performance criteria are met, if necessary. If mitigation must be implemented offsite, suitable mitigation lands shall be identified and purchased in the local vicinity of the site or watershed. The Plan shall discuss preservation of the site through a conservation easement and identify an approach for funding assurance for the long-term management of the conserved land.

Significance After Mitigation. Implementation of the above mitigation measures will result in a net increase in jurisdictional areas. This will reduce the impacts resulting from implementation of the project to a less than significant level.

Impact BIO-3 Implementation of the proposed project could result in indirect impacts to wildlife movement through the Santa Clara River corridor. Impacts would be Class II, *significant but mitigable*.

The South Coast Missing Linkages Project identified the Santa Clara River as an important component of the Santa Monica-Sierra Madre Connection, particularly because it offers one of the few connections between the Pacific Ocean and inland natural areas (Penrod et al., 2006). The Santa Clara River offers wildlife movement and habitat for a wide variety of animals including large animals such as bobcats, mountain lions, and mule deer, species which can be sensitive to human disturbances. The Santa Clara River also offers suitable habitat for a wide variety of special status species such as threatened and endangered species including least Bell's vireo, southwestern willow flycatcher, Santa Ana sucker, tidewater goby, unarmored threespine stickleback, and southern steelhead.

The proposed project would be located east of the Santa Clara River corridor and its associated habitats and waters. However, some project impacts will occur to the mulefat scrub habitat associated with the river corridor, and the adjacent ruderal area, which provides some buffering and use to wildlife species. Direct removal of the scrub habitat would not be considered significant given the limited size that may be removed due to development activities and the amount of available habitat remaining within the greater river corridor. While these developments are not expected to directly affect wildlife movement through this corridor, several indirect impacts may occur that would be considered significant. These short- and long-term impacts may occur as night time lighting, increased noise (construction and vehicular traffic), increased nonnative plant and wildlife typically associated with urbanization, and an overall increase in human presence from developed parcels adjacent to natural habitat. Additionally, impacted areas east of the levee would potentially be subject to erosion during storm events that could impact adjacent biological resources. These impacts could discourage wildlife use of natural habitats through the adjacent Santa Clara River habitat. Such impacts would therefore be considered significant on wildlife movement. Fish species are primarily expected to occur with the active flow channel of the Santa Clara River. As such, impacts to fish movement from project activities are not anticipated.

Mitigation Measures. To avoid project short term related construction impacts and longer term project impacts to wildlife movement, the following mitigation measures are required.

BIO-3(a) Lighting and Sound Restrictions. New sources of lighting and glare shall comply with City standards. The project shall incorporate lighting design features to the extent possible that will reduce the amount and intensity of night lighting in open space areas adjacent to the development. This will involve using lighting only to the extent necessary, using low intensity lights, placing lighting close to the ground when possible, using shields to reduce glare and direct lighting downward, and pointing lights away from open space areas. Light from onsite sources shall not exceed 0.01 foot-candles as measured at three feet above the ground at the edge of the development.

Sound amplification equipment shall be shielded from the Santa Clara River habitat to reduce effects on wildlife movement. Sound levels shall not exceed a Leq of 65 dBA as measured at the edge of the project boundary. Prior to approval of the lighting and sound plans, a qualified biologist shall review lighting and sound plans to ensure that the proposed levels minimize potential impacts on wildlife movement. Within one year after completion of construction when each new development is in operation, a report shall be submitted to the City that, through light and sound level monitoring, confirms that installed equipment do not exceed the specified criteria.

BIO-3(b) Invasive Weed Prevention. Applicants shall develop and implement Invasive Weed Prevention and Management Programs to prevent invasion of undeveloped native habitat areas by nonnative plant species. A list of target species shall be included, along with measures for early detection and eradication before any species can gain a foothold and outcompete native plant species for resources.

All temporarily disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six (6) weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan.

BIO-3(c) Fencing. Fencing shall be installed along the south and eastern project boundaries adjacent to the Santa Clara River (e.g. at the east toe of the levee slope) to prevent unnecessary and unrestricted pedestrian, vehicular, bicycle, equestrian, or urban wildlife access across the levee and into the river area.

BIO-3(d) Construction Best Management Practices (BMPs). The following BMPs shall be implemented:

Construction fencing shall be installed five (5) feet outside of the disturbance limits of active grading areas. The disturbance areas and fencing shall not encroach closer than 30 feet to sensitive habitats.
Establish appropriate BMPs along construction boundaries to provide erosion and sediment control and contain onsite.
A 15 mph speed limit shall be designated in all construction areas.
All equipment washout and fueling areas shall located within the limits of grading at a minimum of 200 feet from the ephemeral drainage. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site.
Mufflers shall be used on all construction equipment and light trucks shall be in good operating condition.
Spill kits shall be onsite at all times.
Drip pans shall be placed under all stationary vehicles and mechanical equipment.
All trash that may attract predators shall be properly contained, removed from the work site weekly, and disposed of regularly.
Sensitive vegetation removed by accident during construction shall be restored.
Comply with the NPDES State General Construction Permit, the project's Storm Water Pollution Prevention Plan (SWPPP) BMPs to control the discharge of pollutants, including sediment, into local surface water drainages

BIO-3(e) Storm Drain BMPs. To minimize the degradation of water quality which could impact sensitive fish and other aquatic resources, all future private and public storm drain facilities that would drain into the Santa Clara River shall incorporate protective BMPs for sediment and pollution control.

Significance After Mitigation. Implementation of the above mitigation measures will reduce impacts to wildlife moving through the Santa Clara River during construction of the project and from long-term occupancy of adjacent developed habitats to a less than significant level.

Impact BIO-4 Implementation of the proposed project could result in tree removal, branch trimming, and/or ground disturbances within driplines. Impacts would be Class I~~I~~I, ~~*less than*~~ *significant but mitigable*.

The majority of the project site is heavily disturbed and does not contain trees. However, several mature *Eucalyptus* trees occur along the southwester site boundary, associated with the adjacent golf course to the south. Construction of the levee could impact some or all of these trees via branch or root trimming, root compaction, and/or complete removal. A windrow of ornamental trees occurs between the ruderal and developed areas within the north central portion of the project site, and individual scattered ornamental trees also occur through the

developed portions of the project site. The eventual full build-out of the project site area may impact some of these ornamental trees.

While the removal or long term decline of some or all of these trees due to development activities would result in the loss of avian nesting habitat, these impacts would not be considered significant due to the extent of similar available habitat throughout the greater project region. Furthermore, the City of Ventura does not have an adopted tree protection ordinance regulating impacts to native or nonnative trees for development on either public or private lands. If an ordinance were passed prior to the initiation of project activities, than potential impacts to certain trees may require a permit and/or mitigation. All project trees planted, pruned, or removal within the public easement would have to fall under the jurisdiction of the Ventura City's Parks Division. A no-cost permit must be obtained from the City to plant, prune, or remove any tree located in a parkway or easement.

Mitigation Measure. The following measure is required to address potentially significant impacts to trees.

BIO-4 City Tree Coordination. Prior to initiation of future development projects, applicants shall confirm that the City of Ventura has not approved a tree protection ordinance that is applicable to any trees within the project area. Furthermore, applicants will coordinate with the City's Parks Division for project activities involving the planting, pruning, or removal of any tree located in an existing parkway or easement. Per the City's recommended tree planting requirement for specific roadways with City limits, any trees installed within the Olivas Park Drive right-of-way shall be restricted to island live oak (*Quercus tomentella*).

Significance After Mitigation. Implementation of the above mitigation measure would reduce impacts to a less than significant level.

Impact BIO-5 Implementation of the proposed project would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan, or other local adopted conservation plans. Impacts are Class III, *less than significant*.

No adopted habitat preservation or conservation plans govern the project site. Therefore, the project would have a less than significant impact on adopted plans governing biological resources in this area.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not required.

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

c. Cumulative Impacts. Section 15130 of the *CEQA Guidelines* provides guidance on the discussion of cumulative impacts. Two conditions apply to determine the cumulative effect of a project: first, the overall effect on biological resources caused by existing and known or forecasted projects must be considered significant under the significance thresholds discussed above; and second, the project must have a "cumulatively considerable" contribution to that effect. The following are considered with respect to analyzing cumulative impacts to biological resources:

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

The cumulative effect of impacts resulting from the proposed project depends on the proximity of subsequent approved or proposed projects. The City of Oxnard is also planning the construction of a levee on the opposite (south) side of the Santa Clara River in the vicinity of the proposed project. This approximately two-mile long levee would extend roughly from Victoria Avenue to Highway 101. Although the exact placement of the levee has not been defined and the CEQA document has not been circulated for public review, construction of the levee would be expected to impact similar sensitive biological resources discussed above (e.g. sensitive wildlife species and their habitat, riparian communities, jurisdictional waters). However, the Oxnard levee is larger, extends into the River, and would be anticipated to result in greater temporary and permanent impacts to the River. Development of the Oxnard levee would be subject to CEQA review and agency permit measures designed to minimize impacts to biological resources to the extent practicable.

Thus, buildout of the proposed project in conjunction with other development near the River would continue to disturb areas with the potential to affect biological resources. However, as discussed above, impacts of the proposed project are generally limited to the outer extent of riparian resources. Thus, the project is considered to have an incremental effect relative to the cumulative development planned along the River and project impacts are not considered to make a substantial contribution to that cumulative impact.

The open space and wildlife habitats associated with the Santa Clara River serve as a landscape link between lands down and upstream of the project site. The South Coast Missing Linkages Project identified the Santa Clara River as an important component of the Santa Monica-Sierra Madre Connection, particularly because it offers one of the few connections between the Pacific Ocean and inland natural areas. This wildlife movement corridor and habitat linkage has been experiencing considerable urban growth over the past 25 years. Available aerial photography indicates that urban development on either side of the river and within the corridor itself is cumulatively reducing the viability of this corridor to function for wildlife movement and as a habitat linkage. The proposed project is primarily located outside of the riparian corridor, as is the expected eventual development of the south levee. However, the proposed development, similar to other development in the area, would reduce the overall available wildlife habitat that forms this corridor and increase the adverse effects at urban-wildlife interfaces.

The cumulative contribution of the approved and proposed levee project will not result in significant fragmentation of open space in the project vicinity. Consequently, no additional loss of habitats or sensitive species are expected, and the subject proposed project combined with the pending south levee create no cumulative contribution of urban expansion into natural areas or isolation of open space within the vicinity.

Mitigation measures have been developed to address potentially significant project impacts to the extent possible. Therefore, the effects of the proposed project are not considered cumulatively considerable.

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4.5 GREENHOUSE GAS EMISSIONS

This section analyzes the proposed project's contribution to greenhouse gas emissions and global climate change.

4.5.1 Setting

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against 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 acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC, 2007), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (90% or greater chance) that the global average net effect of human activities since 1750 has been one of warming. The prevailing scientific opinion on climate change is that most of the observed increase in global average temperatures, since the mid-20th century, is likely due to the observed increase in anthropogenic GHG concentrations (IPCC, 2007).

a. Greenhouse Gases (GHGs). Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs 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, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane

(CH_4) has a GWP of 21, meaning its global warming effect is 21 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 1997).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHG, Earth's surface would be about 34° C cooler (CalEPA, 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 (United States Environmental Protection Agency [U.S. EPA], April 2012). 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 40% since the industrial revolution. The global atmospheric concentration of CO_2 has increased from a pre-industrial value of about 280 parts per million (ppm) to 391 ppm in 2011 (IPCC, 2007; Oceanic and Atmospheric Association [NOAA], 2010). The average annual CO_2 concentration growth rate was larger between 1995 and 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 (NOAA, 2010). Currently, CO_2 represents an estimated 82.8% of total GHG emissions (Department of Energy [DOE] Energy Information Administration [EIA], August 2010). The largest source of CO_2, and of overall GHG emissions, is fossil fuel combustion.

Methane. Methane (CH_4) is an effective absorber of radiation, though its atmospheric concentration is less than that of CO_2 and its lifetime in the atmosphere is limited to 10 to 12 years. It has a global warming potential (GWP) approximately 21 times that of CO_2. Over the last 250 years, the concentration of CH_4 in the atmosphere has increased by 148 percent (IPCC, 2007), although emissions have declined from 1990 levels. Anthropogenic sources of CH_4 include enteric fermentation associated with domestic livestock, landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (U.S. EPA, April 2012).

Nitrous Oxide. Concentrations of nitrous oxide (N_2O) began to rise at the beginning of the industrial revolution and continue to increase at a relatively uniform growth rate (NOAA, 2010). N_2O is produced by microbial processes in soil and water, including those reactions that occur in fertilizers that contain nitrogen, fossil fuel combustion, and other chemical processes. Use of these fertilizers has increased over the last century. Agricultural soil management and mobile source fossil fuel combustion are the major sources of N_2O emissions. The GWP of nitrous oxide is approximately 310 times that of CO_2.

Fluorinated Gases (HFCS, PFCS and SF_6). Fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfurhexafluoride (SF_6), are powerful GHGs that are emitted from a variety of industrial processes. Fluorinated gases are used as substitutes for ozone-

depleting substances such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (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 (1987) and Clean Air Act Amendments of 1990. Electrical transmission and distribution systems account for most SF_6 emissions, while PFC emissions result from semiconductor manufacturing and as a by-product of primary aluminum production. Fluorinated gases are typically emitted in smaller quantities than CO_2, CH_4, and N_2O, but these compounds have much higher GWPs. SF_6 is the most potent GHG the IPCC has evaluated.

b. Greenhouse Gas Emissions Inventory. Worldwide anthropogenic emissions of GHGs were approximately 40,000 million metric tons (MMT) CO_2E in 2004, including ongoing emissions from industrial and agricultural sources, but excluding emissions from land use changes (i.e., deforestation, biomass decay) (IPCC, 2007). CO_2 emissions from fossil fuel use accounts for 56.6 percent of the total emissions of 49,000 MMT CO_2E (includes land use changes) and CO_2 emissions from all sources account for 76.7 percent of the total. Methane emissions account for 14.3 percent of GHGs and N_2O emissions account for 7.9 percent (IPCC, 2007).

Total U.S. GHG emissions were 6,821.8 MMT CO_2E in 2009 (U.S. EPA, April 2012). Total U.S. emissions have increased by 10.5 percent since 1990; emissions rose by 3.2 percent from 2009 to 2010 (U.S. EPA, April 2012). This increase was primarily due to (1) an increase in economic output resulting in an increase in energy consumption across all sectors; and (2) much warmer summer conditions resulting in an increase in electricity demand for air conditioning. Since 1990, U.S. emissions have increased at an average annual rate of 0.5 percent. In 2010, the transportation and industrial end-use sectors accounted for 32 percent and 26 percent of CO_2 emissions from fossil fuel combustion, respectively. Meanwhile, the residential and commercial end-use sectors accounted for 22 percent and 19 percent of CO_2 emissions from fossil fuel combustion, respectively (U.S. EPA, April 2012).

Based upon the California Air Resources Board (ARB) California Greenhouse Gas Inventory for 2000-2009 (ARB, October 2011), California produced 453 MMT CO_2E in 2009. The major source of GHG in California is transportation, contributing 38 percent of the state's total GHG emissions. Electricity generation is the second largest source, contributing 23 percent of the state's GHG emissions (ARB, October 2012). California emissions are due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. The ARB has projected statewide unregulated GHG emissions for the year 2020 will be 507 MMT CO_2E (ARB, April 2012). These projections represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

c. Potential Effects of Global Climate Change. Globally, climate change 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 emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Scientists have projected that the average global surface temperature could rise by1.0-4.5°F (0.6-2.5°C) in the next 50 years, and the increase may be as high as 2.2-10°F (1.4-5.8°C) in the next century. In addition to these

projections, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic (IPCC, 2007).

According to the CalEPA's *2010 Climate Action Team Biennial Report*, potential impacts of climate change in California 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 (CalEPA, April 2010). Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Sea Level Rise. According to *The Impacts of Sea-Level Rise on the California Coast*, prepared by the California Climate Change Center (CCCC) (May 2009), climate change has the potential to induce substantial sea level rise in the coming century. The rising sea level increases the likelihood and risk of flooding. The study identifies a sea level rise on the California coast over the past century of approximately eight inches. Based on the results of various global climate change models, sea level rise is expected to continue. The California Climate Adaptation Strategy (December 2009) estimates a sea level rise of up to 55 inches by the end of this century.

Air Quality. Higher temperatures, which are 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, thereby 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 March, 2009).

Water Supply. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future water supplies in California. However, the average early spring snowpack in the Sierra Nevada decreased by about 10 percent during the last century, a loss of 1.5 million acre-feet of snowpack storage. During the same period, sea level rose eight inches along California's coast. California's temperature has risen 1°F, mostly at night and during the winter, with higher elevations experiencing the highest increase. Many Southern California cities have experienced their lowest recorded annual precipitation twice within the past decade. In a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR], 2008; CCCC, May 2009).

This uncertainty complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The Sierra snowpack provides the majority of California's water supply by accumulating snow during our wet winters and releasing it slowly when we need it during our dry springs and summers. Based upon historical data and modeling DWR projects that the Sierra snowpack will experience a 25 to 40 percent reduction from its historic average by 2050.

Climate change is also anticipated to bring warmer storms that result in less snowfall at lower elevations, reducing the total snowpack (DWR, 2008).

Hydrology. As discussed above, climate change 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 may be a product of climate change 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 due to salt water intrusion. 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 of 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 air 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 thereby affect their quality (CCCC, 2006).

Ecosystems and Wildlife. Climate change 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 project that the average global surface temperature could rise by 1.0-4.5°F (0.6-2.5°C) in the next 50 years, and 2.2-10°F (1.4-5.8°C) in the next century, with substantial regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. 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, 2004; Parmesan, C. and H. Galbraith, 2004).

While the above-mentioned potential impacts identify the possible effects of climate change at a global and potentially statewide level, in general scientific modeling tools are currently unable to predict what impacts would occur locally with a similar degree of accuracy. In general, regional and local predictions are made based on downscaling statewide models (CEC, March 2009).

Local Effects of Climate Change. While the above discussion identifies the possible effects of climate change at a global and potentially statewide level, current scientific modeling tools are unable to predict with a similar degree of accuracy what local impacts may occur. In general, regional and local predictions are made based on downscaling statewide models (CalEPA, April 2010).

d. Regulatory Setting

International Regulations. The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change (UNFCCC) since it was produced by the United Nations in 1992. The UNFCCC is an international environmental treaty with the objective of, "stabilization of GHG concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system." This is generally understood to be achieved by stabilizing global GHG concentrations between 350 and 400 ppm, in order to limit the global average temperature increases between 2 and 2.4°C above pre-industrial levels (IPCC 2007). The UNFCC itself does not set limits on GHG emissions for individual countries or enforcement mechanisms. Instead, the treaty provides for updates, called "protocols," that would identify mandatory emissions limits.

Five years later, the UNFCC brought nations together again to draft the *Kyoto Protocol* (1997). The Kyoto Protocol established commitments for industrialized nations to reduce their collective emissions of six GHGs (CO_2, CH_4, N_2O, SF_6, HFCs, and PFCs) to 5.2 percent below 1990 levels by 2012. The United States is a signatory of the Kyoto Protocol, but Congress has not ratified it and the United States has not bound itself to the Protocol's commitments (UNFCCC, 2007). The first commitment period of the Kyoto Protocol ended in 2012. Governments, including 38 industrialized countries, agreed to a second commitment period of the Kyoto Protocol beginning January 1, 2013 and ending either on December 31, 2017 or December 31, 2020, to be decided by the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol at its seventeenth session (UNFCCC, November 2011).

In Durban (17th session of the Conference of the Parties in Durban, South Africa, December 2011), governments decided to adopt a universal legal agreement on climate change as soon as possible, but not later than 2015. Work will begin on this immediately under a new group called the Ad Hoc Working Group on the Durban Platform for Enhanced Action. Progress was also made regarding the creation of a Green Climate Fund (GCF) for which a management framework was adopted (UNFCCC, December 2011; United Nations, September 2012).

Federal Regulations. 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 (led by the Secretaries of Energy and Commerce) that is charged with carrying out the President's National Climate Change Technology Initiative (U.S. EPA, December 2007). However, the voluntary approach to address climate change and greenhouse gas emissions may be changing. The United States Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al*. ([2007] 549 U.S. 05-1120) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act.

The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. The first annual reports were due in March 2011.

On May 13, 2010, the U.S. EPA issued a Final Rule that took effect on January 2, 2011, setting a threshold of 75,000 million tons (MT) CO_2E per year for GHG emissions. New and existing industrial facilities that meet or exceed that threshold will require a permit after that date. On November 10, 2010, the U.S. EPA published the "PSD and Title V Permitting Guidance for Greenhouse Gases." The U.S. EPA's guidance document is directed at state agencies responsible for air pollution permits under the Federal Clean Air Act to help them understand how to implement GHG reduction requirements while mitigating costs for industry. It is expected that most states will use the U.S. EPA's new guidelines when processing new air pollution permits for power plants, oil refineries, cement manufacturing, and other big pollution point sources.

On January 2, 2011, the U.S. EPA implemented the first phase of the Tailoring Rule for GHG emissions Title V Permitting. Under the first phase of the Tailoring Rule, all new sources of emissions are subject to GHG Title V permitting if they are otherwise subject to Title V for another air pollutant and they emit at least 75,000 MT CO_2E per year. Under Phase 1, no sources were required to obtain a Title V permit solely due to GHG emissions. Phase 2 of the Tailoring Rule went into effect July 1, 2011. At that time new sources were subject to GHG Title V permitting if the source emits 100,000 MT CO_2E per year, or they are otherwise subject to Title V permitting for another pollutant and emit at least 75,000 MT CO_2E per year.

California Regulations. Assembly Bill (AB) 1493 (2002), referred to as "Pavley," requires ARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22 per cent reduction by 2012 and 30 per cent by 2016.

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO 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, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 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, and landfill methane capture, etc.

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels; the same requirement as under S-3-05), and requires ARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the

2020 deadline. In addition, AB 32 requires ARB to adopt regulations to require reporting and verification of statewide GHG emissions.

After completing a comprehensive review and update process, the ARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2E. The Scoping Plan was approved by ARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.
Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing ARB to develop regional greenhouse gas emission reduction targets to be achieved from vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG), the MPO for most of Southern California, including Ventura County, was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 13 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of sub-regional plans by the sub-regional councils of governments and the county transportation commissions to meet SB 375 requirements. In April 2012, SCAG adopted its SCS for the entire SCAG region as part of the adopted its 2012-2035 RTP/SCS. The goal of the SCS is to achieve the SB 375 GHG reduction targets of 8 percent per capita for the planning year 2020 and 13 percent per capita for 2035.

ARB Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005 percent of California's total inventory of GHG emissions for 2004.

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

For more information on the Senate and Assembly bills, Executive Orders, and reports discussed 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.

California Environmental Quality Act. Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the *State CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions. As noted previously, the adopted *CEQA Guidelines* provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), the San Luis Obispo Air Pollution Control District (SLOAPCD), and the San Joaquin Air Pollution Control District (SJVAPCD) have adopted quantitative significance thresholds for GHGs. Although adopted, the Bay Area's thresholds are the subject of litigation by the Building Industry Association.

4.5.2 Impact Analysis

a. Methodology and Significance Thresholds. Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project.

According to the adopted *CEQA Guidelines*, impacts related to GHG emissions from the proposed project would be significant if the project would:

> *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or*
> *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

The *CEQA Guidelines* (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. Significance thresholds, quantitative or otherwise have not been adopted by the VCAPCD or the City of Ventura. The California Air Pollution Control Officers Association's (CAPCOA) *CEQA and Climate Change* white paper (January 2008) discusses three possible approaches to evaluating the significance of GHG emissions; however, CAPCOA does not endorse any particular approach. The three alternative significance approaches are (1) not establishing a significance threshold for GHG emissions; (2) setting the GHG emission threshold at zero; and (3) setting the GHG emission threshold at some

non-zero level. The white paper evaluates potential considerations and pitfalls associated with the three approaches.

A number of significance thresholds have been adopted or are in the process of being developed in other regions of the state. Furthermore, *CEQA Guidelines* Section 15130(a) recognizes 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 for the analysis of the proposed project's GHG emissions under CEQA.

Neither VCAPCD nor the City of Ventura has adopted a plan, policy, or regulation for the purpose of reducing the emissions of GHGs to a level that would be considered less than significant under CEQA. However, in November 2011 the VCAPCD published *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*, which describes recommended, proposed, and adopted GHG emissions thresholds in use throughout the State. This document notes that VCAPCD staff is considering a tiered approach involving consistency with a locally adopted GHG reduction plan followed by a bright-line threshold for land use projects that would capture 90 percent of project GHG emissions. VCAPCD staff is also exploring an efficiency-based metric for land use projects and plans. These potential approaches are consistent with approaches recommended by the CAPCOA in *CEQA and Climate Change* (January 2008).

The neighboring South Coast Air Quality Management District (SCAQMD) has adopted quantitative significance thresholds for GHGs. SCAQMD has also convened a GHG CEQA Significance Threshold Working Group, the goal of which is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA. In September 2010, the Working Group announced its most recent iteration of the draft thresholds, which recommended a single numerical threshold for all non-industrial projects of 3,000 MT CO_2E/year and plan-level efficiency targets of 6.6 metric tons of carbon dioxide equivalents per year (MT CO_2E/yr) per service population as a 2020 target and 4.1 MT CO_2E/yr per service population as a 2035 target (SCAQMD, September 2012). Service population is the sum of residential and employee populations.

Since the proposed project involves multiple actions (roadway extension, levee construction, and future commercial and industrial development) it is evaluated based on the SCAQMD plan-level thresholds described above. Therefore, the proposed project would have a significant impact related to GHG emissions if potential future buildout of the project site would generate more than 4.1 MT CO_2E/year per service population.

In addition to these quantitative thresholds, this analysis examines the proposed project's consistency with the California Environmental Protection Agency's (CalEPA) GHG emissions reduction strategies that were prepared by CalEPA's Climate Action Team (CAT) for projects below 10,000 metric tons CO_2E/year, and the Attorney General's 2008 Project Level Mitigation Measures. The CAT strategies are recommended to reduce GHG emissions at a statewide level to meet the goals of the Executive Order S-3-05 (http://www.climatechange.ca.gov). The Attorney General's Project Level Mitigation Measures are intended to be included as design

features of a project, required as changes to the project, or imposed as mitigation (http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf).

Based upon Appendix G of the *CEQA Guidelines* under Section VII, *Greenhouse Gas Emissions*, and the SCAQMD GHG Significance Threshold Working Group draft thresholds, the project's contribution to cumulative impacts related to GHG emissions and climate change would be cumulatively considerable if the project would:

> *Generate greenhouse gas emissions, either directly or indirectly, that exceed 3,000 MT CO_2E/yr for project-level components and/or exceed 6.6 MT CO_2E/yr per service population in 2020 and/or 4.1 MT CO_2E/yr per service population in 2035 for plan-level components*
> *Conflict with applicable greenhouse gas emissions reduction strategies identified by CalEPA's CAT or the Attorney General's 2008 Project Level Mitigation Measures.*

Cumulative GHG Impacts. The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an 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, other current projects, and probable future projects (*CEQA Guidelines*, Section 15355).

Study Methodology. Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98.9 percent of all GHG emissions by volume (IPCC, 2007) and are the GHG emissions that the project would emit in the largest quantities. Emissions of all GHGs are converted into their equivalent weight in CO_2 (CO_2E). Minimal amounts of other main GHGs (such as chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the calculated CO_2E amounts. Calculations are based on the methodologies discussed in the CAPCOA *CEQA and Climate Change* white paper (January 2008) and included the use of the California Climate Action Registry (CCAR) General Reporting Protocol (January 2009).

On-Site Operational Emissions. Operational emissions from energy use (electricity and natural gas use) for the project were estimated using the California Emissions Estimator Model (CalEEMod) 2011 Version 2011.1.1 software program (see Appendix B for calculations). The default values on which the CalEEMod software program are based include the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions of CO_2, N_2O and CH_4. This methodology is considered reasonable and reliable for use, as it has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC. It is also recommended by CAPCOA (January 2008).

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating, were calculated in CalEEMod and utilize standard emission rates from CARB, U.S. EPA, and district supplied emission factor values (CalEEMod User Guide, 2011).

Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, 2011). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California.

Direct Emissions from Mobile Combustion. Emissions of CO_2 and CH_4 from transportation sources for the proposed project were quantified using the CalEEMod software model. Because the CalEEMod software program does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified using the California Climate Action Registry General Reporting Protocol (January 2009) direct emissions factors for mobile combustion (see Appendix B for calculations). The number of vehicle trips associated with anticipated maximum development of the project area used to estimate GHG emissions was based on the EIR traffic study, prepared by Associated Transportation Engineers (December, 2012) (Appendix F) and was calculated and extrapolated to derive total annual mileage in CalEEMod. Emission rates for N_2O emissions were based on the vehicle mix output generated by CalEEMod and the emission factors found in the California Climate Action Registry General Reporting Protocol.

A limitation of the quantitative analysis of emissions from mobile combustion is that emission models, such as CalEEMod, evaluate aggregate emissions, meaning that all vehicle trips and related emissions assigned to a project are assumed to be new trips and emissions generated by the project itself. Such models do not demonstrate, with respect to a regional air quality impact, what proportion of these emissions are actually "new" emissions, specifically attributable to the project in question. For most projects, the main contributor to regional air quality emissions is from motor vehicles; however, the quantity of vehicle trips appropriately characterized as "new" is usually uncertain as traffic associated with a project may be relocated trips from other locales. In other words, vehicle trips associated with the project may include trips relocated from other existing locations, as people begin to use new commercial industrial uses instead of similar existing uses. Therefore, because the proportion of "new" versus relocated trips is unknown, the VMT estimate generated by CalEEMod is used as a conservative, "worst-case" estimate.

Construction Emissions. Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches (as discussed above) adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA, 2008). Nevertheless, air districts such as the SCAQMD (2011) have recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project's operational emissions.

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. The CalEEMod software program was used to estimate emissions associated with

the construction period, based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment use during construction. Complete results from CalEEMod and assumptions can be viewed in Appendix B.

b. Project Impacts and Mitigation Measures.

Impact GHG-1 The proposed project would generate short-term as well as long-term GHG emissions. Total emissions associated with the currently proposed construction and potential future development on the project site would exceed the 4.1 MT CO_2E/yr per service population threshold and would incrementally contribute to climate change. Impacts would therefore be Class II, *significant but mitigable*.

The proposed project involves extension of Olivas Park Drive and construction of a new levee. These are the only physical changes currently proposed. In addition, the project would allow for the future development of up to 1,258,000 square feet of commercial development and 75,000 square feet of industrial development. GHG emissions for the project were calculated using the CalEEMod emissions modeling software based on the maximum development potential of the project site. This estimate serves to disclose a "worst-case" scenario associated with potential future commercial and industrial buildout facilitated by the proposed project. The following summarizes the project's overall GHG emissions, organized by project component (refer to Appendix B for full CalEEMod software output).

Roadway Extension and Levee. For the purpose of this analysis, construction of the proposed roadway extension and levee is assumed to occur over a period of approximately 8 months. As shown in Table 4.5-1, construction activity for the roadway extension and levee would generate an estimated 740.5 MT CO_2E. The proposed roadway extension and levee would not result in long-term operational emissions of GHGs.

Future Commercial and Industrial Buildout.

Construction Emissions. As future development of commercial or industrial uses on the project site is not currently proposed, the likely construction timing for future commercial and industrial uses within the project area is speculative; therefore default construction phase lengths provided within the CalEEMod software are assumed. Construction activity for the proposed project would generate an estimated 10,735 metric tons of CO_2E. The first year of construction would result in the highest amount of GHG emissions because site preparation and grading would occur during this time. Following the SCAQMD's recommended methodology to amortize emissions over a 30-year period, construction of the proposed project would generate result in 358 metric tons of CO_2E per year.

Table 4.5-1
Estimated Construction Emissions of Greenhouse Gases

Year	Annual Emissions Carbon Dioxide Equivalent (MT CO_2E)
Roadway Extension and Levee	
2013	611.6
2014	128.8
Subtotal	740.5
Amortized over 30 years	24.7 MT CO_2E/year
Future Commercial and Industrial Buildout	
Subtotal	10,734.5
Amortized over 30 years	357.8 MT CO_2E/year

See Appendix B for CalEEMod Results.

On-Site Operational Emissions. As discussed above, the proposed roadway extension and levee would not result in long-term operational emissions of GHGs. Therefore, this category includes emissions from consumption of electricity and natural gas associated with operation and heating/cooling of future commercial and industrial buildings that could be developed on the project site. Estimates of long-term energy and natural gas consumption are based on the maximum buildout potential of the project site. The generation of electricity used at the site occurs at off-site power plants, much of which is generated by the combustion of fossil fuels that yield substantial amounts of CO_2, and to a smaller extent N_2O and CH_4.

Table 4.5-2 depicts the total operational emissions of GHGs associated with maximum future buildout on the project site (excluding mobile source emissions), estimated at 10,083 metric tons per year of CO_2E.

Emissions from Mobile Combustion. Mobile source GHG emissions were estimated using the total annual vehicle miles traveled estimate generated by the CalEEMod 2011 model (v. 2011.1). The model estimated that the maximum potential development would generate approximately 76,894,963 annual VMT. As noted above, CalEEMod does not calculate N_2O emissions related to mobile sources. As such, N_2O emissions were calculated based on the project's VMT using calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009). Table 4.5-3 depicts the estimated mobile emissions of GHGs based on this VMT, estimated at 30,714 metric tons per year of CO_2E.

Table 4.5-2
Annual On-Site Operational Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2E)
Area	<0.1
Energy	5,141.5
Waste	2,585.9
Water	2,356.0
Total On-Site Operational Emissions	**10,083.4 MT CO_2E/year**

Sources: CalEEMod version 2011.1
See Appendix B for calculations. Includes energy from electrical usage, water usage, wastewater conveyance, solid waste generation, and area source emissions from natural gas and heating.

Table 4.5-3
Annual Mobile Emissions of Greenhouse Gases

Emission Source	Annual Emissions	
	Emissions (MT)	MT CO_2E
Carbon Dioxide (CO_2)	29,140.9	29,140.9
Methane (CH_4)	1.2	25.6
Nitrous Oxide (N_2O)[1]	5.0	1,547.2
Total Mobile Emissions		**30,713.7 MT CO_2E/year**

Sources: CalEEMod 2011 (version 2011.1).
See Appendix B for calculations according to California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1,January 2009, page 30-35.

Combined Stationary and Mobile Source Emissions. Table 4.5-4 combines the amortized construction, operational, and mobile GHG emissions associated with potential maximum development, as well as the amortized emissions associated with the proposed roadway extension and levee. As shown therein, project emissions would total approximately 41,180 metric tons per year CO_2E. These emission projections indicate that the majority of the project GHG emissions are associated with vehicular travel (approximately 75%). It should be noted that mobile emissions are in part a redirection of existing travel to other locations, and so may already be a part of the total California GHG emissions.

Table 4.5-4
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2E)
Roadway Extension and Levee	
Construction	24.7
Future Commercial and Industrial Buildout	
Construction	357.8
Operational	10,083.4
Mobile	30,713.7
Project Total MT CO_2E/year	**41,179.6 MT CO_2E/year**

Sources: CalEEMod 2011 (v.2011.1).
See Appendix B for calculations and for GHG emission factor assumptions.

In order to compare total emissions to the service population threshold, employees of the future commercial and industrial development were estimated based on a Ventura County specific factor of employees per square feet by land use category (Natelson Company, 2001). Maximum commercial and industrial buildout of the project site is expected to generate 2,500 employees. Based on this projection, emissions associated with the operation of future development on all 14 properties that make up the project site would result in 16.47 metric tons of CO_2E/yr per service population. Overall emissions would therefore exceed the 4.1 metric tons of CO_2E/yr per service population threshold of significance, resulting in a potentially significant impact unless mitigation is incorporated. It should be recognized, however, that these thresholds are typically applied to individual development projects whereas buildout of the project site involves multiple individual developments on 14 individual properties. No development is currently proposed as part of the project and future development will be required to comply with mitigation measure GHG-1 in order to ensure that individual developments do not exceed the GHG threshold.

Mitigation Measures. The following mitigation measure would reduce GHG emissions associated with future development on the project site.

GHG-1 GHG Emissions Calculations. Future project site developers shall perform project-specific GHG calculations to determine whether their proposed development would generate emissions exceeding the 4.1 metric tons of CO_2E/year per service population threshold, applicable VCAPCD threshold, or recommended City of Ventura threshold in place at the time of development. Project-specific GHG emissions calculations may be completed as stand-alone studies or may be incorporated into required CEQA analysis for individual projects. Applicants of development projects determined to exceed the appropriate threshold, as determined by the City of Ventura, shall implement one or more of the following in order to reduce GHG emissions to below the threshold of significance utilized by the City at the time of development.

GHG Reduction Plan. Prior to permit issuance, the applicant shall develop a GHG Reduction Plan that would reduce annual greenhouse gas emissions from the project. The plan will be implemented on site by the project applicant and may include, but is not be limited to, the following components:

1. *Alternative fuel vehicles*
2. *Energy conservation policies*
3. *Energy efficient equipment, appliances, heating and cooling*
4. *Energy efficient lighting*
5. *Green building and roofs*
6. *Water conservation and recycling*
7. *Renewable energy production*
8. *Off-site vehicle trip reduction*
9. *Carbon sequestration*

Purchase Carbon Offsets. If greenhouse gas emissions cannot be reduced to below a level of significance through compliance with a project GHG Reduction Plan, the project applicant shall purchase carbon offsets to reduce GHG emissions below threshold levels. Purchased carbon offsets shall be approved by City staff prior to permit approval.

Significance After Mitigation. Implementation of the recommended mitigation measures would reduce GHG emissions associated with potential future development on the project site. Compliance with a project GHG Reduction Plan and/or purchase of carbon offsets would mitigate the impacts to a less than significant level.

Impact GHG-2 The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Impacts would be Class III, *less than significant*.

The proposed project is generally consistent with applicable regulations or plans addressing GHG reductions. As discussed above, the CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions. The CAT strategies are recommended to reduce GHG emissions at a statewide level to meet the goals of the Executive Order S-3-05. 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. Several of these actions are already required by California regulations. In addition, in 2008 the California Attorney General published The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level (Office of the California Attorney General, Global Warming Measures Updated May 21, 2008). This document provides information that may be helpful to local agencies in carrying out their duties under CEQA as they relate to global warming. Included in this document are various measures that may reduce the global warming related impacts of a project. Tables 4.5-5 and 4.5-6 illustrate that the proposed project would be consistent with the GHG reduction strategies set forth by the 2006 CAT Report as well as the 2008 Attorney General's Greenhouse Gas Reduction Measures.

Table 4.5-5
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 ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	**Consistent** 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 of the potential future commercial and industrial developments 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 percent 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 48percent has been achieved on a statewide basis. Therefore, a 2percent additional reduction is needed.	**Consistent** The City of Ventura is required to achieve the 50 percent Statewide Recycling Goal. It is anticipated that the roadway extension and levee construction, as well as any potential future commercial and industrial development would similarly divert at least 50 percent of its solid waste after the recyclable content is diverted.

Table 4.5-5
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
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 roadway extension and levee construction, as well as any potential future commercial and industrial development 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** Potential future commercial and industrial development on the project site would be anticipated to include landscaping and/or tree planting.
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** Potential future commercial and industrial development would include water saving features such as the use of gray water for landscape irrigation and providing low flow plumbing fixtures pursuant to the requirements of the California Green Building Code.
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** Potential future commercial and industrial development would need to comply with the standards of Title 24 that are in effect at the time of development. In addition if adopted, mitigation options under Mitigation Measure AQ-2(a) require an increase in efficiency to 20 percent 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** Employees of the potential future commercial and industrial developments 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.

Table 4.5-5
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
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.
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** Employees of the potential future commercial and industrial developments 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 that advance cleaner transportation and reduce climate change emissions.	**Consistent** The proposed project would improve connectivity within the project vicinity and locate new commercial and industrial development in a relatively close proximity to existing commercial and industrial areas within the City. The project site would also have readily available access to SR 126 and US 101, thereby improving the efficiency of goods movement.
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	**Consistent** As discussed above, the proposed project would improve connectivity within the project vicinity and locate new commercial and industrial development in a relatively close proximity to existing commercial and industrial areas within the City. The project site would also have readily available access to SR 126 and US 101, thereby improving the efficiency of goods movement.

Table 4.5-5
Project Consistency with Applicable Climate Action Team Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	
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 potential future commercial and industrial development on the project site is required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition if adopted, mitigation options under Mitigation Measure AQ-2(a) require an increase in efficiency to 20 percent 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.
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** Potential future commercial and industrial development on the project site would have the option to consider the installation and use of solar equipment.

Table 4.5-6
Project Consistency with Applicable Attorney General Greenhouse Gas Reduction Measures

Strategy	*Project Consistency*
Transportation-Related Emissions	
Diesel Anti-Idling Set specific limits on idling time for commercial vehicles, including delivery vehicles.	**Consistent** Currently, the California Air Resources Board's (CARB) Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling restricts diesel truck idling to five minutes or less. Construction vehicles are also subject to this regulation.
Transportation Emissions Reduction Provide shuttle service to public transportation.	**Consistent** Applicants of potential future commercial and industrial development on the project site would have the option to develop a Transportation Demand Management (TDM) program as discussed in Mitigation Measure AQ-2.

Table 4.5-6
Project Consistency with Applicable Attorney General Greenhouse Gas Reduction Measures

Strategy	***Project Consistency***
Solid Waste and Energy Emissions	
Solid Waste Reduction Strategy Project construction shall require reuse and recycling of construction and demolition waste.	**Consistent** The City of Ventura is required to achieve the 50 percent construction and demolition diversion. It is anticipated that the roadway extension and levee construction, as well as any potential future commercial and industrial development would similarly divert at least 50 percent of its construction and demolition waste.
Water Use Efficiency Require measures that reduce the amount of water sent to the sewer system – see examples in CAT standard above. (Reduction in water volume sent to the sewer system means less water has to be treated and pumped to the end user, thereby saving energy.	**Consistent** As described above, future commercial and industrial developments would include water saving features such as the use of gray water for landscape irrigation and low flow plumbing fixtures as required by California Green Building Code.
Land Use Measures, Smart Growth Strategies and Carbon Offsets	
Smart Land Use and Intelligent Transportation Systems Require pedestrian-only streets and plazas within the candidate sites and destinations that may be reached conveniently by public transportation, walking or bicycling.	**Consistent** Applicants of potential future commercial and industrial development on the project site would have the option to develop a Transportation Demand Management (TDM) program as discussed in Mitigation Measure AQ-2.

As discussed above, SCAG recently adopted the 2012 RTP/SCS. As stated in the RTP/SCS, lead agencies (including local jurisdictions) are solely responsible for determining consistency of any future project with the SCS when a project is using the RTP/SCS to streamline the GHG analysis for CEQA purposes. The proposed project does not use the RTP/SCS for streamlining purposes, and as such, consistency analysis is not required. The proposed project would, however, be consistent with the population growth assumptions used in the RTP/SCS.

In summary, the proposed project would be consistent with CAT strategies, the 2008 Attorney General Greenhouse Gas Reduction Measures and the growth assumptions of the 2012 SCAG RTP/SCS. Therefore, implementation of the project would be consistent with the objectives of AB 32, SB 97, and SB 375.

Mitigation Measures. Mitigation is not required.

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

c. Cumulative Impacts. As indicated above, GHG emissions associated with the proposed roadway extension and levee were found to be less than significant, and with the implementation of Mitigation Measure GHG-1, GHG emissions associated maximum potential buildout of the project site were reduced to a less than significant level. Analysis of GHG-related impacts is cumulative in nature as climate change is related to the accumulation of

GHGs in the global atmosphere. Although cumulative increases in atmospheric GHGs may be significant, the proposed project's contribution to cumulative levels of GHGs is not considered considerable since, with mitigation, emissions associated with the roadway extension and levee, as well as potential buildout of commercial and industrial development, would not exceed quantitative thresholds and future development would comply with applicable plans and policies pertaining to GHG reduction.

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4.6 HAZARDS/HAZARDOUS MATERIALS

This section discusses potential impacts relating to soil and groundwater contamination. The analysis is based upon the findings of a Phase II Environmental Site Assessment (ESA) for the proposed project prepared by Rincon Consultants, Inc. (February 2011), as well as on searches of state databases for sites with hazardous materials. This document is incorporated by reference and is available for review at the City of Ventura Community Development Department.

4.6.1 Setting

The project site encompasses ~~111.8~~about 139 acres located between Golf Course Drive and Johnson Drive, primarily within the City of Ventura. One parcel is located within the jurisdiction of the County of Ventura and includes a wastewater treatment facility that would be demolished as part of the proposed project. Eight parcels within the project site are currently developed with automobile-related facilities and a gaming club. One parcel includes agricultural land (row crops), and the remaining 4 parcels are currently vacant and undeveloped.

a. Environmental Records Search. The following databases were searched in February 2013 for known hazardous materials contamination at the project site:

The State Water Resources Control Board (SWRCB) GeoTracker database
The Department of Toxic Substances Control EnviroStor database
The Cortese List

Listed Environmental Sites located on the Project Site. According to the GeoTracker database, the project site contains five sites listed as having a Leaking Underground Storage Tank (LUST). These sites include:

6450 Leland Street – Vreeland Cadillac
6660 Leland Street – Harbor Chrysler/Plymouth
3467 Ventura Road – United Nottingham
3355 Ventura Road – Ventura Olivas
3355 Ventura Road – Ida Swift

Each of these sites has undergone remediation and all cases are closed with the SWRCB. There is also a listed Waste Discharge Requirement (WDR) site within the project site, which is associated with the Montalvo wastewater treatment facility, owned and operated by Montalvo Community Services District (MCSD). Effluent from the facility is subject to WDRs, as established by the Los Angeles Regional Water Quality Control Board (RWQCB), which include limits on constituents and pH. Effluent and groundwater at the site are monitored on a quarterly basis. No exceedances of WDRs were found during the October to December 2012 monitoring period.

Listed Environmental Sites within One-Half Mile of the Project Site. Thirteen sites are listed within one-half mile of the project site with LUSTs that have been remediated and have

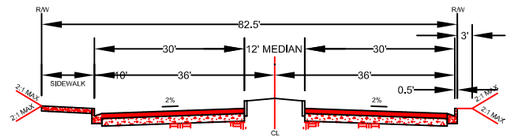
case-closed status with the SWRCB. Three WDR sites are within one-half mile, as is one permitted UST site. One LUST site, located at 6762 North Bank Drive (Exxon Mobil #18-JAR), has an active LUST cleanup site. The contaminant of concern is gasoline and the potential media affected is other groundwater (uses other than drinking water) and soil. The status of this cleanup site is "Open - eligible for closure."

b. Phase II Environmental Site Assessment (ESA). A Phase II ESA was conducted within the proposed roadway alignment to determine whether the current and former land uses have impacted the soil with contaminants. Soil samples were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), metals, and pesticides. The findings of the Phase II ESA are described below and the report is included in Appendix D. Figure 4.6-1 shows the boring locations for the samples that were analyzed in the Phase II ESA and Figure 4.6-2 shows a more detailed view of the boring locations on the MP Enterprises property discussed below.

MP Enterprises. This site (labeled as Parcel 13 on Figure 2-2 in Section 2.0, *Project Description*) is located at the northeast end of the proposed alignment of the Olivas Park Road extension. Based on the current use of the MP Enterprises site as a truck repair facility, soil samples from the property were collected and analyzed for TPH, VOCs, and metals. In one soil sample, collected at 0.5 feet below grade, TPH as diesel range organics (TPHd) was detected at a concentration exceeding the RWQCB action level for TPHd of 100 mg/kg. At the same depth, TPH as oil range organics (TPHo) was detected at concentrations exceeding the RWQCB action level for TPHo of 1,000 mg/kg in 6 soil samples. Pollutant levels exceeding thresholds are shown in Table 4.6-1. Since the borings for the above samples were drilled in an asphalted area, it is possible that the TPHd and TPHo concentrations detected in the soil samples are the result of asphalt in the soil. Two other borings were advanced in a currently vacant area adjacent to the MP Enterprises site, which is assumed to have been used for storage. The levels of TPH, VOCs, and metals detected there were below the regulatory thresholds to which they were compared.

Vacant Land. In an undeveloped area with an unknown prior land use, located between the wastewater treatment site and the MP Enterprises site, soil samples were collected and analyzed for the presence of pesticides, metals, VOCs, and petroleum hydrocarbons. In one sample collected at 0.5 feet below grade, concentrations of the pesticide Toxaphene reached 1,110 g/kg, exceeding the soil screening level of 440 g/kg for residential sites. Toxaphene is an organic compound that was 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 (ATSDR, 1997). Other contaminants detected in the undeveloped area include TPHo; metals; and the pesticides gamma-chlordane, alpha-chlordane, DDD, DDE, and DDT. However, the detected levels of these compounds were below the regulatory thresholds.

~~Wastewater Treatment~ Montalvo Community Services District Site. Based on the presence of structures such as an above-ground storage tank that stores diesel fuel, soil samples were collected from the ~~wastewater treatment~~Montalvo Community Services District (MCSD) site and analyzed for TPH. Despite strong hydrocarbon odors and visual staining in soil samples near the above-ground storage tanks, TPHd and TPHo were detected at low



OLIVAS PARK DRIVE
FULL STREET SECTION
(NOT TO SCALE)

Proposed Alignment*

Geoprobe Boring Location- September 14, 2009

RB12 Geoprobe Boring Identification

MP Enterprises site - see Figure 4.6-2 for boring locations

* Please note that the proposed roadway alignment has slightly changed since preparation of the Phase II ESA. The current alignment as shown in Figure 2-5 is similarly located.

0 200 400 Feet

Boring Locations Map

Drawing Source: City of San Buenaventura, August 2009.

Figure 4.6-1

RB16 Geoprobe Boring Location (September 14, 2009)

HA6 Hand Auger Boring Location (September 14, 2009)

MP Enterprises Boring Locations Map

Basemap Source: 2011 Microsoft Corporation and 2010 NAVTEQ

Figure 4.6-2

concentrations. Likewise, these compounds were detected at low concentrations across the ~~wastewater treatment~~MCSD site.

Agricultural Land. Based on the current and former agricultural use of portions of the project site, soil samples were collected and analyzed for pesticides. Toxaphene was detected at levels exceeding the residential screening level of 440 g/kg in soil samples from 0.5 feet below grade. No other pesticides were detected above regulatory thresholds on agricultural land.

Table 4.6-1 illustrates the pollutant levels exceeding established thresholds at identified sample areas.

Table 4.6-1
Measured Pollutant Levels Exceeding Thresholds

Sample ID	Area	Toxaphene	Diesel Range Organics	Oil Range Organics
RB-9	Undeveloped Area	1.110	--	
RB-26	Agricultural Field	1.230	--	
RB-27	Agricultural Field	0.986	--	
RB-28	Agricultural Field	1.280	--	
RB-16	Truck Repair Facility	--	974	2,130
RB-17	Truck Repair Facility	--	--	1,750
RB-18	Truck Repair Facility 13	--	--	1,040
RB-19	Truck Repair Facility	--	--	1,180
RB-20	Truck Repair Facility	--	--	1,100
RB-21	Truck Repair Facility	--	--	1,240
Regulations	**RWQCB Maximum Soil Screening Level**	**--**	**100 mg/kg**	**1,000 mg/kg**
	US EPA Residential Screening Level	**0.440 mg/kg**	**--**	**--**

Notes: Only those samples and concentrations above the established thresholds were included in the table.
For the complete the list of test results, see Tables 1 to 4 of the Phase II ESA (Appendix D).
All concentrations are in mg/kg
Source: Rincon Consultants, Inc., Soil Assessment, February 11, 2011.

In addition to the results shown in Table 4.6-1, arsenic levels were found to range from 0.35 to 4.16 mg/kg, exceeding the generic U.S. EPA residential screening level in 28 of 29 samples analyzed for metals. Nonetheless, arsenic levels are within the range of typical background concentrations in California (0.6 to 11 mg/kg).

c. Sensitive Receptors. For the purpose of this analysis, sensitive receptors are defined as any facilities or land uses that include people who particularly sensitive to the effects of hazardous materials. Typical sensitive receptors are residences, elderly facilities, and schools. As the project site only includes commercial, industrial, and agricultural uses, it does not contain any sensitive receptors. The nearest sensitive receptor in the project vicinity is an isolated single-family residence located 0.18 miles to the north of Parcel 1. This receptor is located across Highway 101 from the project site. As discussed in the Initial Study, no schools are located within one-quarter mile of the project site.

d. 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 Regional Screening Levels 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.

4.6.2 Impact Analysis

a. Methodology and Thresholds of Significance. The assessment of potential hazardous impacts is based on searches of hazardous sites in the project site and a Phase II ESA conducted for proposed alignment of the Olivas Park Drive extension. Appendix G of the *CEQA Guidelines* considers a project to have a significant environmental impacts if the project would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
b) 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;

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school;
d) Be located on a site which is included on a list of hazardous material 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;
e) 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 site;
f) 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 site;
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
h) 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.

As discussed in the Initial Study, impacts related to the emission of hazardous materials within one-quarter mile of an existing school; airport hazards; interference with an emergency response plan; and wildland fire hazards were found not to be significant. Further discussion of these issues can be found in the Initial Study, which is included in Appendix A.

b. Project Impacts and Mitigation Measures.

Impact HAZ-1 Within the proposed roadway extension and levee alignment on the project site, demolition of existing structures and soil disturbance during construction could release pesticides, TPH, and lead at levels that pose health risks. Impacts to the release of hazardous materials within the roadway alignment would be Class II, *significant but mitigable*.

Portions of the Olivas Park Drive extension and levee would cross through an area currently and historically used for agricultural production. As discussed in the *Setting*, the Phase II ESA identified soil contamination due to former use of the pesticide Toxaphene. Based on the results of the Phase II ESA conducted for the road extension, vacant and agricultural areas included a total of four samples where the pesticide Toxaphene exceeded the RWQCB action level of 440 g/kg. Soil disturbance during construction of the roadway extension or levee could release Toxaphene at levels that pose a health risk to construction workers during ground-disturbing activities. Although the pesticide is not mobile or soluble in water, it can present a hazard to humans and animals through contact or ingestion. This impact would be potentially significant and Mitigation Measure HAZ-1 would be required. After construction of the roadway extension, impervious surfaces covering the soil would prevent further exposure to Toxaphene.

Soil disturbance and demolition activities during construction could also result in the release of lead and/or asbestos. The Phase II ESA detected lead at levels above 50 mg/kg at four locations on the MP Enterprises site (see Appendix D). Although detected concentrations of lead do not exceed the total threshold limit concentration (TTLC) levels adopted by the State Department of Toxic Substances Control, the potential dispersal of soil-based lead during construction of the Olivas Park Drive extension or levee could pose a health hazard to construction workers. In

addition, the proposed project would include demolition of the MCSD wastewater treatment facility, which was likely constructed in the mid-1970s and may contain asbestos and/or lead-based paint. During demolition, the proposed project would be required to comply with CalOSHA regulations regarding lead-based materials. California Code of Regulations, §1532.1, requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards. With adherence to these existing regulations, potential impacts from lead-based paint would be less than significant.

The handling of asbestos-containing material (ACM) is regulated by the Ventura County Air Pollution Control District (APCD). Pursuant to APCD Rule 62.7, a building that is suspected of containing asbestos (according to its date of construction) must be surveyed before obtaining a demolition permit. Samples of building materials should be sent to a California state-licensed consultant or laboratory for analysis. If one or more samples contain asbestos, a licensed asbestos contractor must remove all asbestos-containing material (ACM) prior to demolition. Written notification of the removal of ACM must be postmarked or delivered to the APCD at least 10 days beforehand. The disposal of waste ACM must be in accordance with federal hazardous waste and state toxic waste laws. With adherence to Rule 62.7, potential impacts from the release of asbestos would be less than significant.

As discussed in the *Setting*, the Phase II ESA also found petroleum-based contaminants at the MP Enterprises truck repair facility (Parcel 13), located on Ventura Road at the northern end of the proposed Olivas Park Drive extension and levee. At this site, TPH as diesel range organics (TPHd) and as oil range organics (TPHo) were detected at concentrations exceeding RWQCB action levels. TPHd and TPHo concentrations did not exceed action levels at the MCSD site. However, ~~D~~due to concentrations of TPH exceeding RWQCB action levels at the MP Enterprises site, the impacts of contamination from gasoline use would be potentially significant and Mitigation Measure HAZ-1 would be required.

After construction of the proposed Olivas Park Drive extension, vehicles operating on the roadway could transport hazardous waste through the project site. These vehicles would be required to comply with existing regulations for the transportation of hazardous waste. In addition, potential releases of the above contaminants during construction of the Olivas Park Drive extension would not substantially affect sensitive receptors. Areas surrounding the project site contain commercial, industrial, and agricultural uses, with the exception of a single-family residence located 0.18 miles to the north of Parcel 1. This sensitive receptor, however, is situated on the opposite side of U.S. Highway 101 from the project site. Similarly, the nearest residential neighborhood is located nearly one-half mile away from the project site, to the north of U.S. Highway 101. With adherence to these regulations, impacts from transporting hazardous waste would be less than significant.

Mitigation Measures. The following measure shall be implemented to mitigate potentially significant adverse health hazards relating to soil contamination in the proposed roadway extension and levee alignment.

HAZ-1 Soil Management Plan. In the area of the proposed Olivas Park Drive extension and levee alignment, a Soil Management Plan shall be prepared prior to grading to provide procedures for characterization, handling, storage, disposal, and documentation of all soils to be

excavated during construction activities. This plan will describe the approach for managing soils consistent with all laws and regulations regarding the excavation, handling, and disposal of impacted soils, including Ventura County Air Pollution Control District (VCAPCD) Rule 55 (Fugitive Dust) and VCAPCD Rule 74.29 (Soil Decontamination Operations) (if applicable). The plan shall be approved by the Los Angeles Regional Water Quality Control Board prior to the issuance of a demolition permit.

At the MP Enterprises site (Parcel 13), where lead has been detected in soil samples, the Soil Management Plan shall require additional sampling and analysis for this metal prior to the removal of soil. Any soils that contain lead at levels exceeding the Soluble Threshold Limit Concentration (STLC) shall be excavated and disposed as a hazardous waste. Soils in Parcel 13 that have been identified as containing TPH at levels exceeding RWQCB action levels shall also be excavated and disposed as a hazardous waste. Upon removal of the concrete pad in Parcel 13, the underlying soil shall be tested for TPH and treated as a hazardous waste if contamination is detected. In the four locations where Toxaphene contamination has been detected, soils shall be excavated and disposed as a hazardous waste.

Contaminated soil will either be stockpiled on-site or will be loaded directly onto trucks and covered and transported to an approved off-site disposal / recycling facility. If contaminated soil is stored on-site, it shall be stockpiled on polyethylene or placed in containers approved by the federal Department of Transportation (DOT) until it is transported to an approved off-site disposal / recycling facility. Disposal of contaminated soils shall occur at an appropriate facility licensed to handle such contaminants and remedial excavation shall proceed under the supervision of an environmental consultant licensed to oversee such remediation. The remediation / disposal program shall be approved by VCEHD. The proponent shall submit all correspondence to VCEHD prior to issuance of grading permits. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation / disposal, a qualified environmental consultant shall prepare a report summarizing the project, the remediation / disposal approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.

Significance After Mitigation. Implementation of the mitigation measure identified above would reduce human health risks associated with possible contamination in the area of the roadway extension and levee alignment to a less than significant level.

Impact HAZ-2 Future development facilitated by the proposed General Plan amendments and zoning changes on the project site could result in the release or use of hazardous materials. Impacts would be Class II, *significant but mitigable.*

The proposed project would facilitate commercial and industrial development of land on Parcel 10 that is currently used for agricultural activities, as a result of General Plan amendments and zoning changes, as well as on additional lands that were formerly used for agriculture, including parcels 9, 11, and 14. Past and current agricultural activities could have involved the use of pesticides such as Toxaphene. Consequently, although the commercial and industrial uses that could be developed on-site are less sensitive to such contamination than other types of uses (e.g., residential), the potential presence of soil and groundwater contamination on-site could pose hazards to construction workers, future workers, and patrons of commercial and industrial developments. It should be noted, however, that there would be a low potential for release of Toxaphene after project buildout: most contaminated soil would be covered by commercial and industrial development, and the pesticide would not volatilize from areas with exposed soil. Nonetheless, agricultural pesticides represent a potentially significant impact. In addition, petroleum-based contaminants at the MP Enterprises truck repair facility (Parcel 13) were detected at concentrations exceeding RWQCB action levels. Petroleum-based contaminants were also detected at the MCSD site, but concentrations did not exceed regulatory action levels. Nevertheless, Mitigation Measure HAZ-2 would be required.

Development facilitated by the proposed project would also include industrial and commercial activities that could result in the use, storage, or transport of hazardous materials. Adherence to regulations for the generation of hazardous waste from the State Department of Toxic Substances Control and the California Environmental Protection Agency would reduce impacts from industrial use of hazardous materials to a less than significant level. Operation of the proposed levee and commercial development in the project site would not require the use or transport of hazardous materials.

Mitigation Measures. The following measure shall be implemented to mitigate potentially significant adverse health hazards in portions of the project site that would accommodate future development.

HAZ-2 Site-Specific Analysis. Prior to construction of any commercial and/or industrial development within the project area, the developer shall undertake site-specific analysis of potential soil and groundwater contamination. If soil sampling indicates the presence of any contaminant in quantities not in compliance with applicable laws or regulations, the applicant shall coordinate with VCEHD or RWQCB, as appropriate, to develop and implement a program to remediate or manage the contaminated soil or groundwater.

If groundwater is determined to have been affected by on-site contamination, or if soil contamination is detected at depths of 20 feet below grade or greater, then a groundwater sampling assessment shall be performed. If contaminants are detected in groundwater at levels that exceed maximum contaminant levels for those constituents

in drinking water, then the results of the groundwater sampling shall be forwarded to the appropriate regulatory agency (VCEHD, RWQCB, or the State of California Environmental Protection Agency Department of Toxic Substances Control). The agency shall review the data and sign off on the property or determine if any additional investigation or remedial activities are deemed necessary.

If contaminated soil is present, disposal of contaminated soils shall occur at an appropriate facility licensed to handle such contaminants and remedial excavation shall proceed under the supervision of an environmental consultant licensed to oversee such remediation. The remediation / disposal program shall be approved by VCEHD. The applicant shall submit all correspondence to VCEHD prior to issuance of grading permits. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation / disposal, a qualified environmental consultant shall prepare a report summarizing the project, the remediation / disposal approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.

Significance After Mitigation. Implementation of the mitigation measure identified above would reduce human health risks associated with possible contamination in the area of future development to a less than significant level.

Impact HAZ-3 There are five listed LUST sites within the project area and thirteen sites within one-half mile of the project site. Due to the case closed status of these sites, impacts from listed environmental sites would be Class III, *less than significant*.

As discussed in the *Setting*, a search of the GeoTracker database identified LUST cleanup sites at five locations within the project site and 13 locations within one-half mile of the project site. All such LUST sites have been remediated, leaving soil contaminant levels below applicable regulatory thresholds. These listed environmental sites are in case closed status. Therefore, impacts would be *less than significant*.

Mitigation Measures. No mitigation would be required.

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

Impact HAZ-4 The MCSD wastewater treatment facility contains soil contamination in the vicinity of an above-ground storage tank for diesel fuel. Impacts from diesel contamination would be Class II, *significant but mitigable*.

The Phase II ESA reported field evidence of soil contamination in the vicinity of an above-ground storage tank (AST) for diesel fuel at the MCSD wastewater treatment facility (Parcel 12). Soil samples collected from this location had low concentrations of TPH, but were visually

stained and contained strong hydrocarbon odors. Based on this evidence, the diesel AST could present a health hazard during demolition of the Water Pollution Control Plant and construction of the proposed Olivas Park Drive extension and levee. The Phase II ESA also recommended a document review for additional former fuel and waste storage locations within Parcel 12. A search of listed environmental sites in the GeoTracker and EnviroStor databases, and the Cortese list, did not indicate the existence of additional storage locations. However, due to the soil contamination near the diesel AST, impacts would be potentially significant and Mitigation Measure HAZ-4 would be required.

Mitigation Measures. The following measure shall be implemented to mitigate potentially significant adverse health hazards relating to the above ground storage tank on the MCSD property.

HAZ-4 Storage Tank Removal. Prior to construction of the Olivas Park Drive extension, the diesel AST in Parcel 12 shall be removed and properly disposed at a licensed facility. The removal of the storage tank shall be conducted in accordance with VCEHD regulations. Once the tank is removed, the underlying soil shall be inspected by a qualified environmental consultant to determine if soil and/or groundwater sampling beneath the storage tank would be necessary. If contaminated soil is identified and contaminants in concentrations exceeding regulatory thresholds or action levels are detected, a remediation program shall be implemented to reduce contaminants to within acceptable levels as determined by the VCEHD. Remediation options may include, but are not limited to: excavation and removal with offsite disposal or in-situ soil treatment. If contaminated groundwater is identified and contaminants in concentrations exceeding regulatory action levels are detected, a remediation program shall be implemented to reduce contaminants to within acceptable levels as determined by the VCEHD. Remediation options may include, but are not limited to: pumping and treatment, biological remediation, or natural attenuation.

Significance after Mitigation. Implementation of the mitigation measures identified above would reduce direct human health risks associated with the diesel AST 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. Hazard-related impacts resulting from cumulative development would be less than significant.

4.7 HYDROLOGY and WATER QUALITY

This section addresses impacts related to drainage and flood hazards. This section is based on the Draft Hydrology and Hydraulic Report prepared by Hawks & Associates (Appendix E).

4.7.1 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. Topography within the project area is relatively flat and slopes to the west. Existing ground elevations along the Santa Clara River vary from approximately 60 to 70 feet above mean sea level. At least five aquifers occur beneath the study area. The major fresh water bearing sequence is divided into two parts: the upper aquifer system composed of the Oxnard and Mugu aquifers and the lower aquifer system composed of the Hueneme, Fox Canyon, and Grimes Canyon aquifers. Above the Oxnard aquifer, there is a semi-perched aquifer composed of sediments that extend from the surface to approximately 75 feet below grade. In the project area, the groundwater flow direction is most likely to the south or southeast. According to the Ventura County Watershed Protection District (VCWPD), the project area is not an aquifer outcrop and does not provide recharge to the system (City of Ventura, Olivas Park Drive Draft EIR, 1996).

The project area falls within the Santa Clara River watershed, which comprises an area of approximately 1,634 square miles. The climate of the Santa Clara River watershed is characterized by long, dry periods and a relatively short wet period during winter of each year. The types of storms that may occur in the basin are general winter storms, thunderstorms, and tropical cyclones. Approximately 75 % of the precipitation occurs in the months from December through March. Seasonal rainfall is approximately 14 inches near the coast at the river outlet into the Pacific Ocean (VCWPD, 2013).

b. Drainage. Currently, approximately 175 acres south of U.S. Highway 101 and east of Golf course Drive drain southerly to the Santa Clara River (Jensen Design & Survey, Inc., 2013). Project area flows either percolate into the ground or discharge into the Santa Clara River through existing storm drains. The project area consists of a mixture of industrial, commercial, and agricultural land uses that have varying rates of storm runoff depending on the amount of related impervious area. Runoff from existing commercial development located north of Olivas Park Drive and west of Golf Course Drive is collected in a storm drain and flows westerly and then southerly to the Santa Clara River. The existing auto dealers along the northern portion of the project area have improved drainage facilities in place. Surface water from these drainage facilities is collected in the Perkin Avenue storm drain and discharges into the agricultural lands north of the proposed Olivas Park Drive extension. Drainage of the golf course and the agricultural and industrial areas is by sheet flow southwesterly toward the Santa Clara River. No drainage facilities serve the agricultural land uses within the project area because most of the surface water from small storms remains with the project area and percolates into the soil (Olivas Park Drive Draft EIR, 1996).

c. Flood Hazards. 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. The 100-year and 500-year flood zones are shown in Figure 4.7-1.

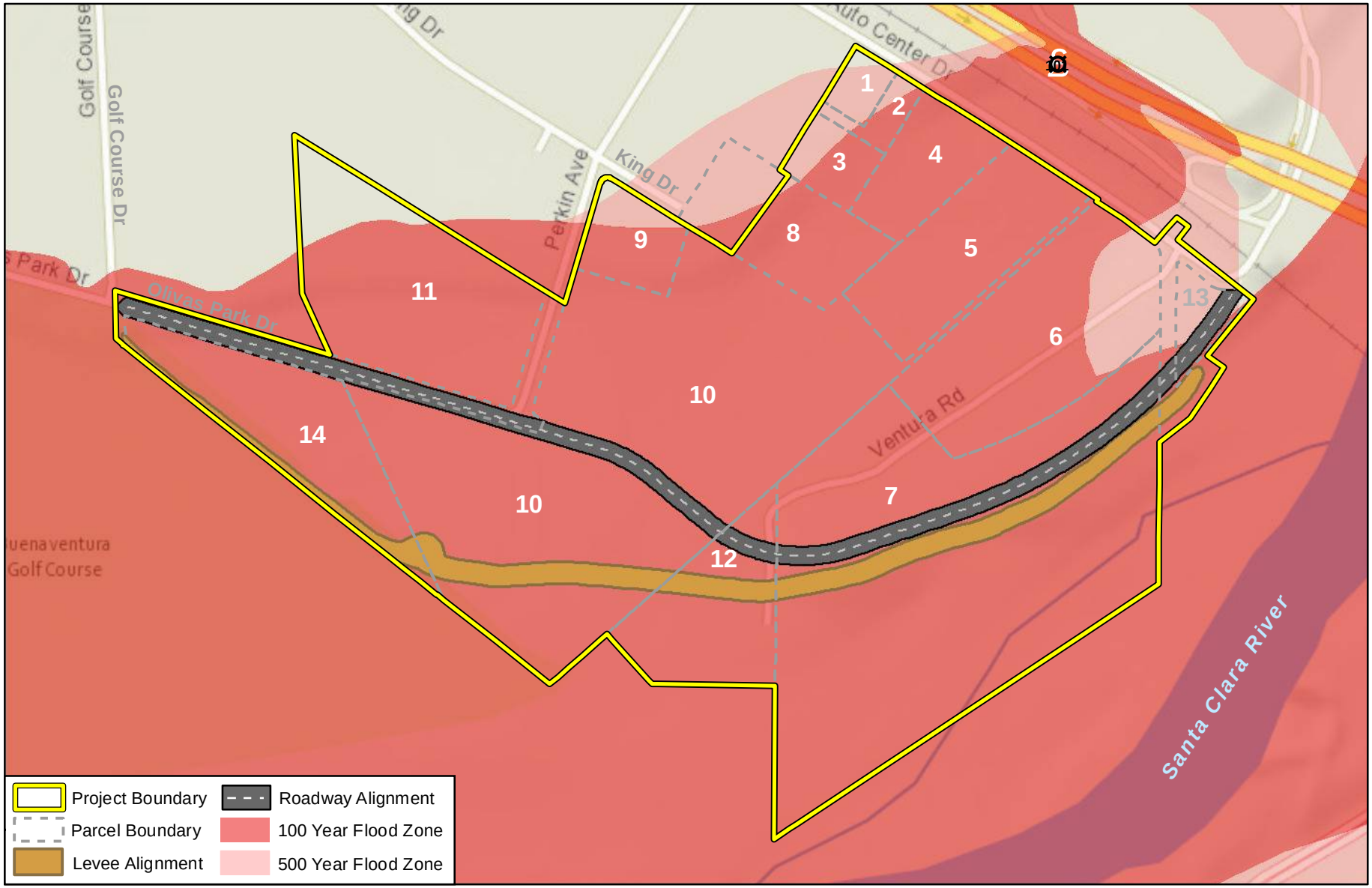
Table 4.7-1 shows historical and recent 100-year storm event flow estimates based on the Montalvo stream gage (United States Geological Survey [USGS] Station 1110850).

Table 4.7-1
Recent 100-Year Storm Event Flow Estimates
Near the Montalvo Stream Gage

Reference	100-Year Storm Event Flow (cfs)
Floodplain and Floodway	
1990 U.S. Army Corps of Engineers (FEMA Effective 100-Year Storm event based on data before 1983)	161,000
1994 Ventura County Flood Control District (now the VCWPD)	200,000
2006 VCWPD (Flood for new FEMA FIS Study)	226,000
2010 Wood Rodgers Technical Memo At Highway 101 1400 feet downstream of Highway 101	 226,000 229,337
Levee Design	
2010 VCWPD	248,000
2010 Wood Rodgers Technical Memo	250,000

Source: Hawks & Associates, Draft Hydrology and Hydraulics Appendix, November 2010 (Appendix E).

It should be noted that FEMA is currently conducting a Flood Insurance Study in collaboration with VCWPD for the Santa Clara River, and 100-year event flows are being re-evaluated.



Basemap Credits: Sources: Esri, DeLorme, HERE, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

0 300 600 Feet

FEMA Flood Hazard Zones

Figure 4.7-1

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. Potential impacts to drainage and stormwater runoff quantity and quality are based on the drainage concept prepared for the proposed project (Jensen Design & Survey, Inc., 2013) and is included in Appendix E. Flood hazard analysis was based on FEMA flood zones and the Draft Hydrology and Hydraulic report prepared for the proposed project (Hawks & Associates, 2010), which is also included in Appendix E. Impacts to water supply are based on the Water Supply Assessment prepared for the proposed project (Rincon Consultants, Inc., 2012), and is included in Appendix E.

Thresholds are based on Appendix G of the *State CEQA Guidelines*. Hydrology and water quality effects of the proposed project are considered significant if the project would:

> *Violate any water quality standards or waste discharge requirements;*
> *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;*
> *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 which would result in substantial erosion or siltation on- or off-site;*
> *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;*
> *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;*
> *Otherwise substantially degrade water quality;*
> *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;*
> *Place within a 100-year flood hazard area structures which would impede or redirect flood flows;*
> *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?*
> *Inundation by seiche, tsunami, or mudflow.*

As identified in the Initial Study, the proposed project would not result in the construction of new housing. Therefore, the project would not place housing within a 100-year flood zone and significant effects were not identified.

b. Project Impacts and Mitigation Measures.

Impact HWQ-1 Construction and operation of the proposed project would comply with existing regulations regarding water quality standards and waste discharge requirements. Impacts would be Class III, *less than significant*.

Construction. Construction of the proposed roadway and levee, as well as construction of new development facilitated by the proposed General Plan amendments and zone changes, would require grading. Construction of the levee in particular would require substantial movement of soil. If large amounts of disturbed, bare soils are exposed during the rainy season, these soils could erode and discharge downstream during a storm event, resulting in sedimentation and degradation of water quality.

Regulations under the federal Clean Water Act and the State require construction activity that disturbs greater than one acre, or that disturbs less than one acre but is part of a larger common plan of development, to comply with the NPDES State General Construction Permit. The NPDES Permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that contains specific actions, termed Best Management Practices (BMPs), to control the discharge of pollutants, including sediment, into local surface water drainages. A Notice of Intent (NOI) to perform work under the Permit must be filed with the State.

The preparation of a SWPPP requires the developer to select a suite of BMPs that are designed to specifically address the potential pollution risks that will be incurred during project construction. BMPs are selected from an approved list of documents (i.e., the California Storm Water BMP Handbook, the Caltrans Storm Water Handbook, Los Angeles County Watershed Management Database, the EPA database, and the ASCE database), which describe practices that have a proven track record of effectively preventing stormwater pollution from construction sites. BMPs appropriate for construction activities are organized into four major categories:

1. *Erosion Control: Measures that prevent erosion and keep soil particles from entering stormwater, lessening the eroded sediment that must be trapped, both during and at completion of construction*
2. *Sediment Control: Feasible methods of trapping eroded sediments so as to prevent a net increase in sediment load in stormwater discharges from the site*
3. *Site Management: Methods to manage the construction site and construction activities in a manner that prevents pollutants from entering stormwater, drainage systems or receiving waters*
4. *Materials and Waste Management: Methods to manage construction materials and wastes that prevent their entry into stormwater, drainage systems, or receiving waters*

The BMPs to be implemented during construction would be developed as part of the SWPPP. Implementation of the SWPPP is the responsibility of the construction site contractor with oversight and inspection by the City of Ventura and the Regional Water Quality Control Board. Full realization of the specific measures in the SWPPP would comply with NPDES General Construction Permit requirements. Compliance with existing regulations would ensure that water quality impacts related to construction activities are less than significant.

Operation. Operation of the proposed roadway, levee, and development facilitated by the proposed General Plan amendments and zone changes would increase the impervious surfaces in the project area. As such, the proposed project would have the potential to increase polluted runoff resulting from vehicles and trash along the roadway and new development facilitated by the proposed general plan amendments and zone changes, such as parking lots

and industrial uses. These surfaces would accumulate deposits of oil, grease, and other vehicle fluids, hydrocarbons and heavy metals. During storms, these deposits could be washed into the storm drain system and directly to the Santa Clara River.

Urban runoff can have a variety of deleterious effects. Oil and grease contain a number of hydrocarbon compounds, some of which are toxic to aquatic organisms at low concentrations. Heavy metals such as lead, cadmium, and copper are the most common metals found in urban stormwater runoff. These metals can be toxic to aquatic organisms, and have the potential to contaminate drinking water supplies. Nutrients from fertilizers, including nitrogen and phosphorous, can result in excessive or accelerated growth of vegetation or algae, resulting in oxygen depletion and additional impaired uses of water. Therefore, the potential increase in urban pollutants in runoff from development facilitated by the proposed project and potential development would have potentially significant impacts to surface water quality.

All project site development would be required to comply with the Ventura County NPDES permit, which regulates waste discharge requirements for stormwater and non-stormwater discharges from the municipal separate storm sewer systems within the VCWPD. Components of the proposed project, such as commercial or industrial development, may also be required to prepare a Stormwater Quality Urban Impact Mitigation Plan (SQUIMP), as appropriate, per the Ventura Countywide Stormwater Quality Management Program. General SQUIMP provisions include the following measures:

1. *Control peak stormwater runoff discharge rates*
2. *Conserve natural areas*
3. *Minimize stormwater pollutants of concern*
4. *Protect slopes and channels*
5. *Provide storm drain system stenciling and signange*
6. *Properly design outdoor material storage areas*
7. *Properly design trash storage areas*
8. *Provide proof of ongoing BMP maintenance*
9. *Design standards for structural or treatment control BMPs.*

In addition, stormwater runoff would be treated with Low Impact Development (LID) techniques as required under the City's MS-4 stormwater permit prior to discharge to the Santa Clara River. 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. For example, the roadway would include a 14-foot median that would be utilized as a detention / treatment swale for the project area. Therefore, compliance with existing regulations regarding stormwater quality would reduce impacts to a less than significant level. It should also be noted that the conversion of vacant and agricultural land within the project site with commercial and industrial development could actually reduce sedimentation and other types of pollutants in runoff by replacing uncontrolled drainage associated with such lands with drainage systems designed to current standards for control of runoff.

Mitigation Measures. Mitigation is not required.

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

Impact HWQ-2 The proposed project would increase impervious surfaces within the project site, which could affect groundwater recharge in the project area. However, all new development facilitated by the proposed project would be required to implement LID techniques, which would increase percolation rates on-site. Impacts to water recharge would be Class III, less than significant.

The construction of the proposed Olivas Park Drive extension and any new development facilitated by the proposed General Plan amendments or zone changes would increase the amount of impervious surfaces on-site. The increase in impervious surfaces would interfere with groundwater recharge in the project area. However, as discussed under Impact HWQ-1, stormwater runoff would be treated with Low Impact Development (LID) techniques as required under the City's MS-4 stormwater permit. LID techniques would slow flowing water through the use of features such as gravel trenches and vegetated swales to allow for infiltration, as well as sediment collection. Overflows can be piped to larger detention systems where the water will be slowly released or infiltrate to the ground. Potential LID techniques could include:

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.
Permeable pavers on sand, decomposed granite, and open cell pavers to provide infiltration, filtration and sediment dropout.

The proposed roadway would include a 14-foot median, which would be utilized as a detention / treatment swale for the project area. Individual projects facilitated by the general plan amendments and zone changes would be required to reduce runoff rates to the same or below pre-development levels. As such, the proposed project would not substantially interfere with groundwater recharge. Furthermore, as discussed in Section 4.10, *Utilities and Service Systems*, sufficient water supply exists to serve the proposed project. As such, the proposed project would not result in a water supply deficit or lower the local groundwater table.

Mitigation Measures. Mitigation is not required.

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

Impact HWQ-3 The proposed project would alter the drainage pattern of the project area ~~by constructing~~ through construction of a levee along the northern bank of the Santa Clara River. Levee construction would increase water surface elevations and flow velocities in the Santa Clara River, as well as cause changes to the top width of the river. Changes to the floodplain and floodway would ~~improve~~ reduce risks

associated with floods on the project site, but ~~w~~could place ~~19 acres of~~ land on the south overbank in Oxnard within the 100-year floodplain. Impacts would be Class II, *significant but mitigable*.

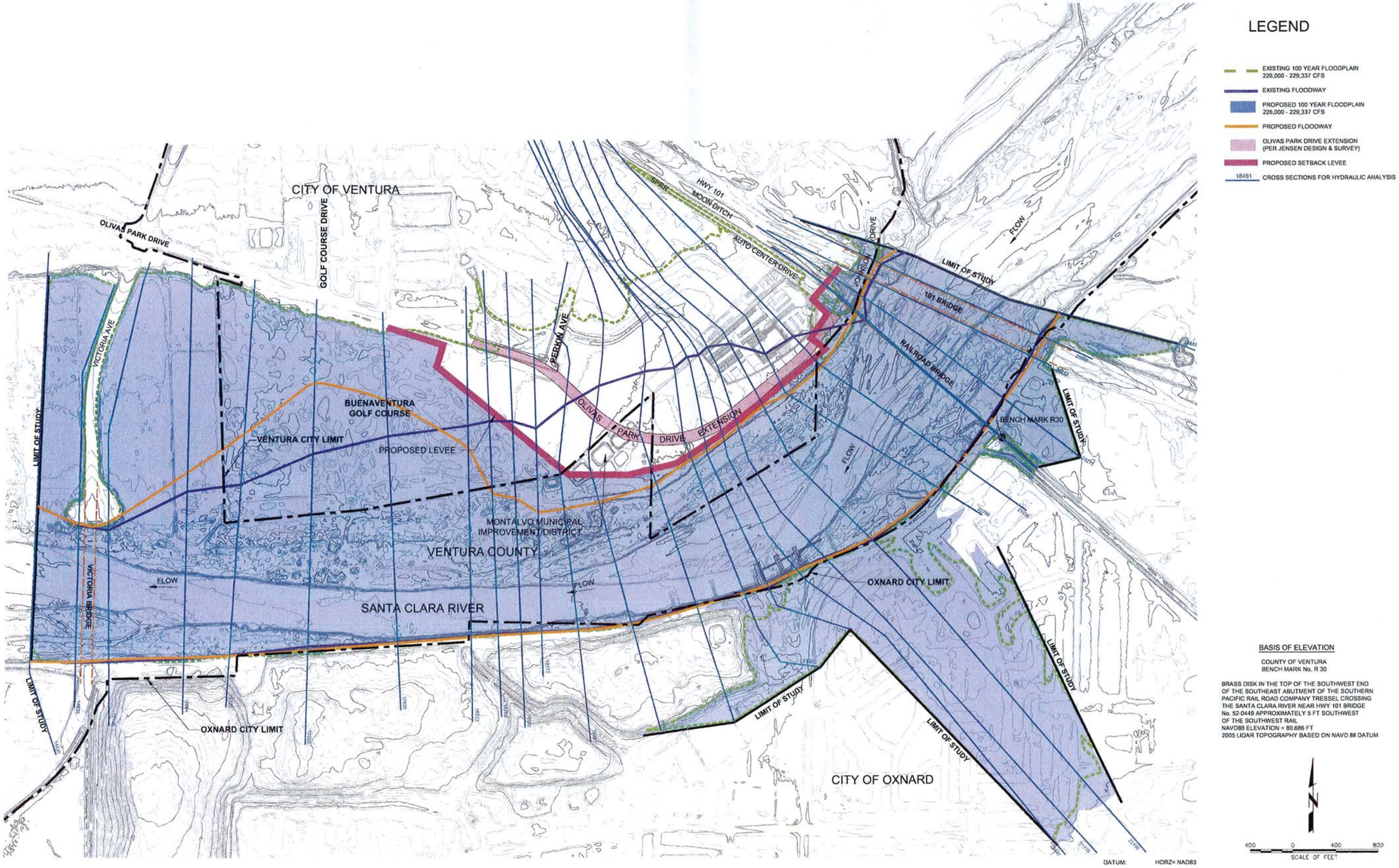
Hawks and Associates prepared a Draft Hydrology and Hydraulic Appendix for the proposed project, which is included in Appendix E. The limits of the hydraulic study reach are from 200 feet upstream of the U.S. Highway 101 Bridge to 450 feet downstream of the Victoria Avenue Bridge. Existing hydraulic factors include the three VCWPD rock groins on the south bank of the river and the two uncertified VCWPD levee systems, referred to as SCR-1 and SCR-3, on the south bank of the river. Flows up to the 25-year storm event (150,000 cfs) would not be affected by the proposed levee per the VCWPD Santa Clara River 2006 Hydrology Update. As such, the hydraulic study evaluated the impacts of the 100-year storm event as the likely maximum probable event.

The City of Oxnard is also planning the construction of a levee on the opposite (south) side of the Santa Clara River in the vicinity of the proposed project. As such, the hydraulic study analyzed floodplain elevations, floodway elevations, top width changes, and velocities of the Santa Clara River under the following scenarios:

Existing conditions with flooding over the existing south river bank for 226,000 cfs – 229,337 cfs
Proposed conditions with only the north river bank levee for the same floods
Proposed conditions with only the south river bank levee for the same floods
Proposed conditions with the north and south river bank levees for the same floods

The results of the hydraulic study for the north river bank levee only and the north and south river bank levee scenarios are discussed below. The south river bank only scenario is not a part of the proposed project. Figures 4.7-2 and 4.7-3 show the existing floodplain and floodway compared to north river bank levee only scenario and the north and south river bank levee scenario, respectively.

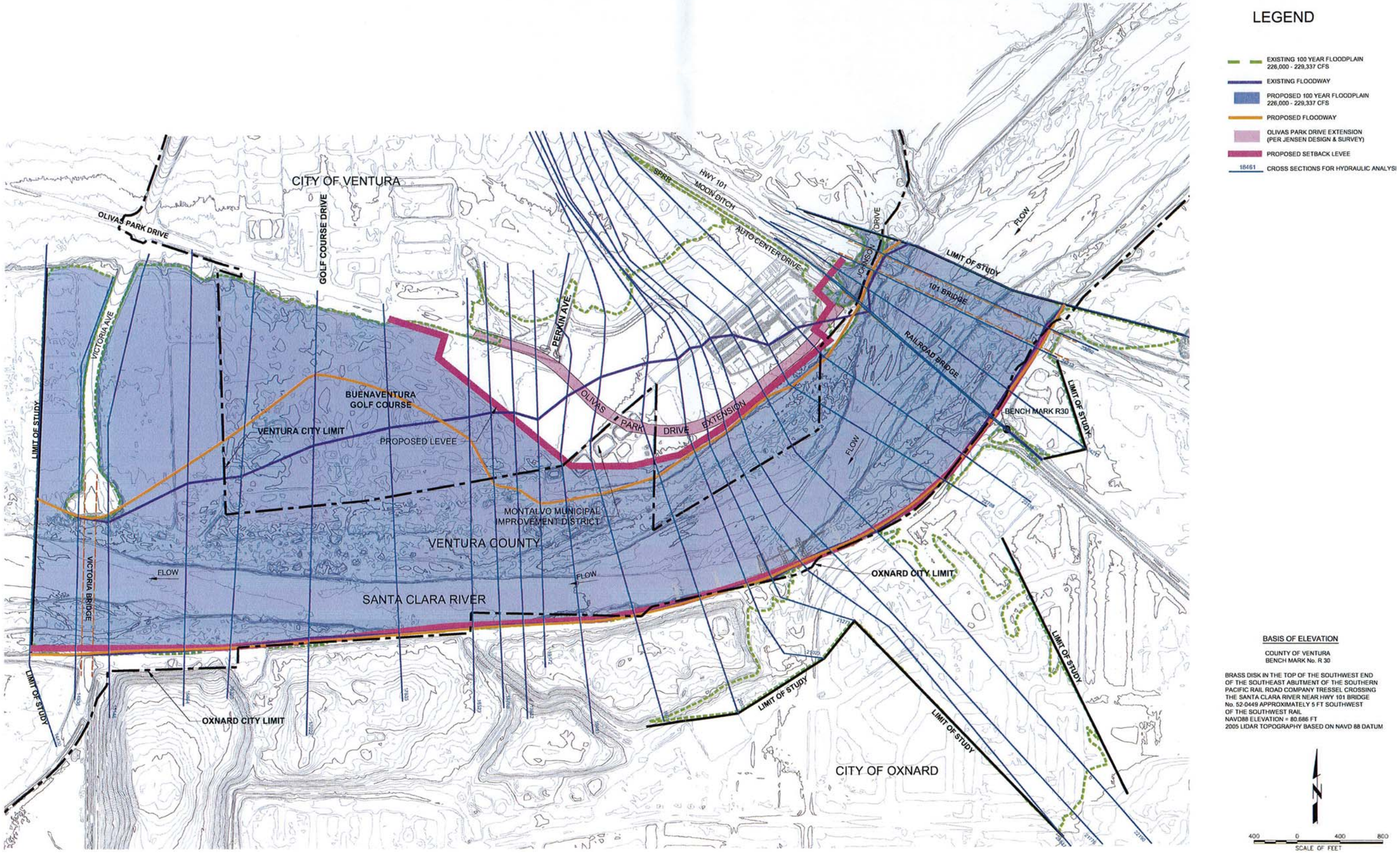
North Levee (Proposed) Only. The hydraulic study determined that the north levee only scenario would not cause changes in water surface elevations upstream or downstream of the levee, but would cause an increase in floodplain water surface elevations adjacent to the levee, with a maximum increase of 2.16 feet for the 100-year storm event. Floodway water surface elevations would increase by more than one foot ~~in the vicinity~~within the river reach directly adjacent to ~~of~~ the levee and decrease by more than a half foot upstream and downstream of the levee. The levee height would be designed to accommodate the increase in water surface elevations in the vicinity of the proposed project and would be required to comply with FEMA and U.S. Army Corps of Engineers (USACE) regulations. Impacts to water surface elevations would be less than significant.



Source: Hawks & Associates, 2010

Floodplain & Floodway with Proposed North Levee

Figure 4.7-2



Source: Hawks & Associates, 2010

Floodplain & Floodway with Proposed North Levee Plus South Levee

Figure 4.7-3

The north levee only scenario would not cause changes in river velocity upstream or downstream of the levee, but would cause an increase in velocity in the river reach directly adjacent to the levee with a maximum increase of 3.7 feet per second (ft/s) for the 100-year storm event. Velocities of the floodway would increase by more than 2 ft/s in the vicinity of the levee and decrease by more than 1 ft/s upstream and downstream of the levee. The final levee design would include modifications to bank and toe protection as needed to comply with FEMA and USACE regulations. In addition, the hydraulic study determined that the proposed project would increase flow velocities by approximately 2.5 ft/s near an existing building and radio tower that are outside the levee alignment. While the increase in flow velocity would be ~~very~~ minor, it may cause erosion of the fill underlying the building. Impacts to erosion resulting from the alteration of the Santa Clara River would be potentially significant. Mitigation Measure HWQ-3(a) would be required.

Construction of the north levee would not cause changes in river top width upstream or downstream of the levee, but would cause a decrease in top width adjacent to the levee with a maximum decrease of 1,894 feet for the 100-year storm event. Top width of the floodway would decrease in the vicinity of the levee by more than 1,000 feet and increase by more than 600 feet upstream and downstream of the levee. Approximately ~~107 acres~~substantial acreage, some of which currently consist~~ing~~s of parking lots, buildings, and the wastewater treatment plant ponds, would be removed from the floodplain during the 100-year storm event. However, ~~19 acres~~additional acreage would be ~~of~~ added to the inundation ~~would be added to the overbank~~ area on the south side of the river in the City of Oxnard. ~~The 19 acres of new floodplain~~This would affect a housing development located adjacent to the Santa Clara River. Impacts to off-site flooding in the south overbank area would be potentially significant. Mitigation Measure HWQ-3(b) would be required.

North and South Levee. Within the study area, ~~T~~the combined levees would remove 107 acres from the floodplain of the north overbank and 110 acres of floodplain in the Oxnard south overbank. The floodplain results from the north and south levee scenario are the same as the north levee scenario except for the top width changes. Top width changes for the north and south levee scenario are dominated by the south overflow boundary. The floodway results from the north and south levee scenario are the same as the north only floodway results. ~~Impacts to f~~Floodplain and floodway impacts in the project area would be less than significant if the two levees are built concurrently since developed areas would not experience an increase in surface water elevation during a 100-year flood event. However, the timing of the construction of the south (Oxnard) levee is currently unknown. Due to the unknown timing of construction, impacts resulting from additional flooding in the south overbank area would be potentially significant. Mitigation Measure HWQ-3(b) would be required. In addition, erosion impacts to the building and radio tower outside of the levee alignment would remain and Mitigation Measure HWQ-3(a) would be required.

Mitigation Measures. Any modifications to the regulatory floodway for the Santa Clara River will be achieved through consultation with the Federal Emergency Management Agency (FEMA), the City of Oxnard, the County of Ventura floodplain manager, the Ventura County Watershed Protection District, and other stakeholders. The following mitigation measures are required.

HWQ-3(a) Erosion Evaluation and Reinforcement. Once the design of the levee has been finalized, stream flow velocity calculations shall be performed by a qualified hydrologist to determine the exact increase near the radio tower and building. If the increase is determined to result in erosion of the fill underlying the building and tower, the structures must be reinforced using rip-rap, soil cement, or similar technique to prevent erosion.

HWQ-3(b) Project Timing. Adequate flood protection shall be provided for both the project area and potentially affected areas along the south side of the Santa Clara River in the City of Oxnard prior to project area construction other than the extension of Olivas Park Drive ~~roadway and levee~~. Construction of the north and south levees shall be coordinated to the extent feasible to ensure that neither the project site nor any developed areas in Oxnard would experience an increase in surface water elevation of more than one foot during a 100-year flood event. ~~the area of the floodplain in the south overbank area would not be increased as a result of the proposed project.~~

Significance after Mitigation. Mitigation Measure HWQ-3(a) would ensure that erosion impacts resulting from increased velocities near the building and radio tower outside of the levee alignment would be addressed. ~~With the implementation of Mitigation Measure HWQ-3(a), impacts would be less than significant.~~ Mitigation Measure HWQ-3(b) would reduce impacts associated with the increase in floodplain area to a less than significant level by ensuring that developed areas within the project site and the City of Oxnard would not experience a surface water elevation of more than one foot during a 100-year flood event.

Impact HWQ-4 Construction of the levee would impede runoff from the project area from discharging into the Santa Clara River, which would burden the existing drainage system. However, the proposed project would include the installation of new storm drains and drainage features to facilitate the discharge of stormwater from the project area. Therefore, impacts to the capacity of the existing storm drain system would be Class III, *less than significant*.

Jensen Design & Survey, Inc. prepared a drainage concept for the proposed project in January of 2013. Proposed runoff quantities for the 175-acre watershed in which the project site is located were estimated using the Ventura County Tc Calculator and assume the entire watershed to be fully developed (95% impervious). The proposed flow rates from the watershed, as shown in Table 4.7-2, are determined for a 10-year storm event (Q10), a 50-year storm event (Q50), and a 100-year storm event (Q100) using cubic feet per second (cfs).

Table 4.7-2
Proposed Flow Rates

Q10 (cfs)	Q50 (cfs)	Q100 (cfs)
280	404	455

Source: Jensen Design & Survey, Inc., Drainage Concept for Olivas Park Drive Extension, 2013.

The construction of the proposed levee would impede these flows, and the existing drainage system would not be sufficient to convey flows. However, the proposed project would include the installation of a storm drain system within the roadway that would outlet to the Santa Clara River. The final size and location of the storm drains has not yet been determined, but Figure 4.7-4 shows the conceptual locations of the new storm drains along the levee wall. The proposed project also includes a 14-foot median in the roadway extension that would be utilized as a detention / treatment swale for the 175-acre watershed.

During a 10-year storm event, stormwater will be discharged through the new storm drains (flapgates) and into the Santa Clara River, as shown in Figure 4.7-1. The flapgates would be sized to accommodate these flows. For storm events above a 10-year storm, the flapgates would be closed until the water level drops in the river and runoff would be detained within the roadway median or within future developments until water surface elevations within the river drop below the pipe outlets in the levee. The proposed project could also utilize drainage along the existing Olivas Park Drive to the west, which drains through the Buenaventura Golf Course and into the Santa Clara River. There is also a 54-inch storm drain to the west of the existing Olivas Park Drive and Golf Course Drive intersection that drains to the golf course, which may have additional capacity to accommodate drainage from the project area. Final design of the Olivas Park Drive extension would determine how much, if any drainage can be outlet through these existing drainage facilities. Any runoff generated from a storm event larger than a 10-year storm would be detained in the project area through the planned median swale and LID techniques. Impacts to the existing storm drain system would be less than significant.

Mitigation Measures. Mitigation is not required.

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

Impact HWQ-5 The proposed project would include the construction of a levee, which would reduce the floodway and floodplain in the project area to protect new and existing structures. Proper engineering would reduce the risk of damage to development in the project area resulting from levee failure. However, because the proposed project would place structures in an area currently designated as a FEMA flood hazard zone, impacts would be Class II, *significant but mitigable*.

Basemap Credits: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Other data

0 330 660 Feet

Conceptual Storm Drain Locations

Figure 4.7-4

The project area is currently located in a FEMA-designated 100-year flood hazard zone. The proposed levee would alter the existing floodway and floodplain to protect the project area from damage during a 100-year flood event, as shown in Figure 4.7-3. However, because new development facilitated by the proposed project would place structures in what is currently designated as a 100-year 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 Santa Clara River 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 and accepted for map revision. Mitigation Measures HWQ-5(a) and HWQ-5(b) would be required.

In addition, as previously discussed in Impact HWQ-3, if the north levee is constructed prior to the south levee, the floodplain area in the south overbank area would increase by 19 acres. Mitigation Measure HWQ-3(b) would be required to reduce impacts associated with the increased floodplain area in the south overbank area.

Mitigation Measures. The following measures would address impacts related to onsite flood hazards.

HWQ-5(a) Conditional Letter of Map Revision (CLOMR). Prior to construction of the levee, a CLOMR from FEMA must be obtained to ensure that project design will accommodate flows during the 100-year storm event.

HWQ-5(b) 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.

Impact HWQ-6 The project site is not located in an area that would be subject to tsunami, seiche, or mudflow. There would be *no impact* in this regard (Class IV).

The project site is located approximately 3.5 miles upstream from the mouth of the Santa Clara River at the Pacific Ocean. Given the directional flow of the river to the west, the proposed project would not be subject to seiche. The topography of the area is also relatively flat and would not be prone to mudflows. The project area is also not located within a tsunami inundation area, as mapped by the California Geological Survey (2009). Given the geography and topography of the project area, there would be no impact associated with tsunamis, seiches, or mudflows.

Mitigation Measures. Mitigation is not required.

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

c. Cumulative Impacts. Development of the proposed project, in conjunction with other development in the Ventura area, would continue to disturb areas with the potential to affect hydrology, drainage, and water 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. In addition, the City of Oxnard is also planning the construction of a levee on the opposite (south) side of the Santa Clara River in the vicinity of the proposed project. This approximately two-mile long levee would be placed along the river edge between south of Victoria Avenue and Highway 101. Cumulative biological impacts associated with the construction of the Oxnard levee are discussed in Section 4.4, *Biological Resources*.

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 VCWPD. This project is being designed to alleviate existing flooding hazards and to accommodate flows from existing and potential future development on the project site, 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.

As discussed in the WSA prepared for the proposed project, there would be sufficient water to accommodate the proposed project, as well as projected potential growth from the 2005 General Plan. As such, cumulative impacts to water supply would be less than significant.

4.8 LAND USE and PLANNING

This section addresses environmental impacts related to land use and planning. The land use analysis is focused on potential inconsistencies with relevant policies and programs adopted for the purpose of avoiding or mitigating environmental effects. The project's relationship to the City's Save Our Agricultural Resources (SOAR) Initiative is also discussed.

4.8.1 Setting

a. Current Land Use. The project site encompasses ~~111.8~~about 139 acres located roughly between Golf Course Drive and Johnson Drive, primarily in the City of Ventura. The irregularly shaped site includes 14 individual parcels, as illustrated on Figure 2-2 in Section 2.0, *Project Description*. The site is primarily located within the City of Ventura, though the ~~3.8~~6.65-acre Montalvo Community Services District (MCSD) property (parcel 12 on Figure 2-2) is currently in unincorporated Ventura County.

The project site includes a variety of land uses, including auto sales and related uses, a gaming club, recreational vehicle sales, vehicle/truck storage, row crops and the MCSD wastewater treatment facility (parcel 12). Three of the parcels within the project site (parcels 7, 11, and 14) are currently unused, vacant land. The current row crop production within the project site occurs on parcel 10, which encompasses just over ~~37~~ 40 acres (see Table 2-2 in Section 2.0). The area currently being farmed is entirely north of the proposed alignment for the Olivas Park Drive extension.

Surrounding uses include auto sales to the north, commercial uses to the northwest, and a golf course to the southwest. Auto Center Drive, the Southern Pacific Railroad, and the U.S. 101 are to the north of the project site, and the Santa Clara River lies to the south and east.

a. Current Land Use Regulations. The project site is subject to land use policies and programs of the City of Ventura and the Ventura County Local Agency Formation Commission. Applicable policies of both agencies are discussed below.

City of Ventura. As discussed in Section 2.0, the ~~111.8~~139-acre project site currently has four General Plan land use designations and six zoning classifications, as listed below:

General Plan Designations
- *Commerce (~~29.4~~43.67 acres)*
- *Agriculture (~~64.33~~91.47 ~~77.2~~ acres)*
- *Industry (13.48 acres)*
- *Specific Plan (4.59 acres)*

Zoning Classifications
- *Single-Family Residential, R-1-1AC (~~60.63~~63.69 acres)*
- *General Industrial, M2 (~~28.66~~49.27 acres)*
- *Commercial Planned Development, CPD (10.53 acres)*
- *Limited Industrial, M1 (7.31 acres)*
- *Manufacturing Planned Development, MPD (1.49 acres)*
- *~~Agriculture~~ Open Space (County - 3.18 acres)*

Figure 2-3 in Section 2.0 shows the current land use designations and zoning classifications for the project site.

In November 1995, a majority of Ventura voters (52%) passed the Save Our Agricultural Resources (SOAR) Ordinance, also known as the Agricultural Lands Preservation Initiative. The SOAR Ordinance requires voter approval for the re-designation of lands designated Agriculture, but specifies that the City Council may re-designate such lands without voter approval if it makes certain findings and these findings are supported by the evidence. An estimated ~~64.33~~91.47 ~~-~~ 77.2 acres within the project site are currently designated Agriculture and the City's General Plan land use map shows the SOAR boundary in the vicinity of the proposed Olivas Park Drive extension. However, because the precise location of the boundary is not clear, the City Council approved Resolution 2009-032 on June 1, 2009 verifying that the northern boundary of SOAR-designated land was intended to coincide with the southern edge of the future right-of-way for the Olivas Park Drive extension. Therefore, the City Council has determined that the SOAR Ordinance does not apply to the 20.4 acres of land currently designated Agriculture that are located along the north side of the proposed road extension. SOAR does, however, apply to the approximately ~~31.4~~56.8 acres of land designated Agriculture that are on the south side of the proposed road extension (see Figure 4.8-1). Consequently, re-designation of these lands as proposed would require either voter approval or Council adoption of the required findings. A discussion of the required findings can be found under Impact LU-2, beginning on page 4.8-9.

Ventura County LAFCO. The Ventura County Local Agency Formation Commission (LAFCo) was formed and operates under the provisions of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.). This law provides for LAFCos to be formed as independent agencies in each county in California. LAFCos implement state law requirements and state and local policies related to boundary changes for cities and most special districts, including spheres of influence, incorporations, annexations, and reorganizations. In this capacity the Ventura LAFCo is the boundary agency for cities and most special districts in Ventura County.

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). Applicable LAFCo policies are discussed under Impact LU-3, beginning on page 4.8-11.

4.8.2 Impact Analysis

a. Methodology and Significance Thresholds. Land use impacts were analyzed by comparing the various components of the proposed project to applicable City of Ventura and Ventura County LAFCO policies adopted for the purpose of avoiding or mitigating environmental effects. The Initial Study contained in Appendix A determined that the project would not have the potential to physically divide and established community or conflict with an adopted habitat conservation plan or natural community conservation plan. Therefore, for purposes of this analysis, impacts would be significant if the proposed project would be

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0 330 660 Feet

Designated SOAR Land

Figure 4.8-1

potentially inconsistent with a City or LAFCo policy adopted to avoid or mitigate an environmental effect.

b. Project Impacts and Mitigation Measures.

Impact LU-1 The proposed project would involve various amendments to the City of Ventura 2005 General Plan and Zoning Map. However, these proposed amendments would not create inconsistencies with any General Plan policies adopted for purposes of avoiding or mitigating an environmental impact. This is a Class III, *less than significant impact*.

As shown in Table 2-2 in Section 2.0, *Project Description*, the proposed project involves General Plan land use designation and zoning changes for several properties within project site. In total, ~~75.24~~55.07 acres would be redesignated from either Specific Plan, Industry, or Agriculture to Commerce, while ~~7.16~~6.85 acres would be redesignated from Agriculture to Industry. A total of ~~101.27~~88.21 acres would be rezoned from either Agriculture, M1, M2, MPD, ~~or~~ R-1-1AC, or OS-80 (County) to CPD (Commercial Planned Development), 6.85 acres would be rezoned from R-1-1AC to MPD, and an estimated 33.35 acres would be rezoned from M2, R-1-1AC, or OS-80 to Parks.

The proposed land use designation and zoning changes would create consistency between the General Plan designations and zoning classifications for the area. They would also allow for development of the various project site parcels with planned commercial and industrial development that is generally consistent and compatible with existing development on surrounding properties, which includes auto sales to the north, commercial uses to the northwest, and a golf course to the southwest.

A discussion of how the proposed project relates to applicable goals and policies of the Ventura General Plan follows.

Our Natural Community. The goal established in the *Our Natural Community* chapter is to be a model for other communities of environmental responsibility, living in balance with the natural setting of coastline, rivers, and hillside ecosystems. Applicable policies are discussed below.

Policy 1B: *Increase the area of open space protected from development impacts.*

Action 1.8: *Buffer barrancas and creeks that retain natural soil slopes from development according to State and Federal guidelines.*

Action 1.11: *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" coastal areas.*

As discussed in Section 4.4, *Biological Resources*, the proposed Olivas Park Drive extension and levee would generally avoid sensitive wetland areas within the Santa Clara River, preserving a buffer between the river and future development. Minor potential temporary or permanent

disturbance of wetland habitat would be mitigated to below a level of significance through measures recommended in Section 4.4 and any additional requirements placed on the project by resource agencies such as the California Department of Fish and Wildlife. The proposed project would not conflict with this policy or associated actions.

Policy 1C: *Improve protection for native plants and animals.*

Action 1.17: *Require development to mitigate its impacts on wildlife through the development review process.*

Action 1.18: *Require new development adjacent to rivers, creeks, and barrancas to use native or noninvasive plant species, preferably drought tolerant, for landscaping.*

Action 1.19: *Require projects near watercourses, shoreline areas, and other sensitive habitat areas to include surveys for State and/or federally listed sensitive species and to provide appropriate buffers and other mitigation necessary to protect habitat for listed species.*

As appropriate, biological resource studies have been conducted as part of this EIR (see discussion in Section 4.4, *Biological Resources*). Mitigation has been provided to avoid significant impacts to sensitive species and habitats, including watercourses. Future development within the project site would comply with all City requirements pertaining to use of drought tolerant, noninvasive landscape species. The proposed project would not conflict with this policy or associated actions.

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 proposed project include:

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

Action 2.4: *Map priority locations for commercial and industrial development and revitalization, including a range of parcel sizes targeted for high technology, non-durables manufacturing, finance, business services, tourism, and retail uses.*

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.*

Under "Pillars for Prosperity," the *Our Prosperous Community* chapter also includes the following statement regarding the Auto Center:

Auto Center – efforts over the short term will focus on making the area a regional retail destination. The City will strengthen its partnership with Auto Center dealers to realize beautification projects and facilitate land use entitlements for additional dealerships.

Among the key objectives of the proposed project (road extension, levee, and land use changes) are: (1) to allow for the logical development of the project site vicinity with uses compatible with those within and around the Ventura Auto Center; and (2) to allow for commercial development that would provide local jobs and increase the City's sales tax base. The proposed project would increase the inventory of land within the City for Commercial Planned Development and Manufacturing Planned Development. It would also consolidate the General Plan designations and zoning classifications for the project site in a manner that would facilitate commercial and industrial development in an area with large amounts of vacant, underutilized land. The proposed roadway extension would provide access to the project site and improve access to other adjacent commercial properties, while the proposed levee would eliminate flood issues that currently serve as an impediment to development on the project site. Based on these facts, the project could be found to be consistent with the above goals and policies.

Our Well Planned & Designed Community. Chapter 3 of the General Plan calls for a well-planned approach to managing growth that protects hillsides, farmlands and open spaces; enhances Ventura's historic and cultural resources; respects the City's diverse neighborhoods; reinvests in older areas of the community; and makes great places by insisting on the highest standards of quality in architecture, landscaping and urban design. Pertinent 2005 General Plan policies and actions include:

Policy 3D: *Continue to preserve agricultural and other open space lands within the City's Planning Area.*

Action 3.20: *Pursuant to SOAR, adopt development code provisions to "preserve agricultural and open space lands as a desirable means of shaping the City's internal and external form and size, and of serving the needs of the residents.*

As discussed in Section 4.2, *Agricultural Resources*, the proposed project would involve the conversion of up to ~~43.36~~29 acres of Prime Farmland and ~~18.32~~1-2 acres of Farmland of Statewide Importance to non-agricultural uses. Although much of this land has not been farmed for several years, some of this land within parcel 10 is currently being used for agriculture. However, as discussed in the *Setting* and under Impact LU-2, the area that is currently being farmed is not subject to the provisions of the SOAR Ordinance since it is north of proposed alignment for the Olivas Park Drive extension. Meanwhile, the lands south of the Olivas Park Drive extension have not been used for farming for at least several years. Consequently, although the conversion of Prime and Statewide Importance farmland is identified as an unavoidably significant impact under CEQA, the proposed project could be found to be consistent with this policy and associated action.

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 proposed Olivas Park Drive extension is specifically shown on the Roadway Classification Plan (Figure 4-3 of the *Our Accessible Community* chapter). Applicable policies and actions are shown below.

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

A key component of the project is the extension of Olivas Park Drive to provide a connection between the current terminus of that roadway and Johnson Drive. Although this is not part of a "grid network," the extension would improve the interconnectivity of the City's transportation system. The project includes a bike lane in order to minimize conflicts between bicycles and automobiles. The project could be found to be consistent with this policy and associated actions.

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

Action 4.16: *Install roadway, transit, and alternative transportation improvements along existing or planned multi-modal corridors, including primary bike and transit routes, and at land use intensity nodes.*

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.*

Although the proposed project includes a road extension, it also includes a bike lane that would enhance both commute and recreational opportunities and serve as a part of the City's overall integrated bike path network. Future development within the project site would also further enhance the area as a node of activity that could provide opportunities for enhanced transit within the Auto Center area. The project could be found to be consistent with this policy and associated actions.

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: U.S. Highway 101.*

Portions of the project site are visible from Highway 101. As such, future project site would incrementally alter views of the area from the highway. However, site development would not block views of any identified scenic resources (e.g., mountains, the Pacific Ocean). In addition, it would generally be consistent and compatible with existing development in and around the Auto Center. Consequently, the proposed project would not conflict with this policy or associated action.

Our Sustainable Infrastructure. Chapter 5 of the General Plan relates to infrastructure and basic policies for conservation. Policies and actions pertinent to the proposed project are discussed below.

Policy 5A: Follow an approach that contributes to resource conservation.

Action 5.1: Require low flow fixtures, leak repair, and drought tolerant landscaping (native species if possible), plus emerging water conservation techniques, such as reclamation, as they become available.

Action 5.2: Use natural features such as bioswales, wildlife ponds, and wetlands for flood control and water quality treatment when feasible.

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

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

Action 5.7: Require project proponents to conduct evaluations of the existing water distribution system, pump station, and storage requirements in order to determine if there are any system deficiencies or needed improvements for the proposed development.

Action 5.8: 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.

Action 5.9: Update development fee and assessment district requirements as appropriate to cover the true costs associated with development.

The project site is adjacent to developed portions of the Auto Center and generally has access to required public services and utilities. Future onsite development would be required to comply with requirements pertaining to water conservation and use of natural features for flood control. A sewer line, water line, and recycled water line extension would be constructed along with the Olivas Park Drive extension, providing future access to required public services. Provision of necessary services and infrastructure to serve future site development would not adversely affect coastal resources. The proposed project would not conflict with thes policies or actions.

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.

Design of the proposed Olivas Park Drive extension and all future project site development would be required to comply with the latest National Pollutant Discharge Elimination System (NPDES) and associated local requirements pertaining to control of stormwater runoff. Compliance with these requirements would minimize the potential for stormwater-related impacts to the Santa Clara River. The proposed project would not conflict with these actions.

Our Healthy and Safe Community. The goal of Chapter 7 of the General Plan is to build effective community partnerships that protect and improve the social well-being and security of all Ventura citizens. Applicable policies and actions are discussed below.

Policy 7D: Minimize exposure to air pollution and hazardous substances.

Action 7.21: Require analysis of individual development projects in accordance with the most current version of the Ventura County Air Pollution Control District Air Quality Assessment Guidelines and, when significant impacts are identified, require implementation of air pollutant mitigation measures determined to be feasible at the time of project approval.

Action 7.22: In accordance with Ordinance 93-37, require payment of fees to fund regional transportation demand management (TDM) programs for all projects generating emissions in excess of Ventura County Air Pollution Control District adopted levels.

The proposed project's air quality impacts are analyzed in Section 4.3, *Air Quality*. Potentially significant impacts have been identified, but mitigation measures to reduce such impacts to below Ventura County APCD significance thresholds have been proposed. Among the measures is a requirement for project site developers to make fee payments toward regional TDM programs per Ordinance 93-37. The proposed project would not conflict with these actions.

Action 7.27: Require proponents of projects on or immediately adjacent to lands in industrial, commercial, or agricultural use to perform soil and groundwater contamination assessments in accordance with American Society for Testing and Materials standards, and if contamination exceeds regulatory action levels, require the proponent to undertake remediation procedures prior to grading and development under the supervision of the County Environmental Health Division, County Department of Toxic Substances Control, or Regional Water Quality Control Board (depending upon the nature of any identified contamination).

As discussed in Section 4.6, *Hazards/Hazardous Materials*, soil contamination assessments have been prepared for potential areas of concern related to the proposed Olivas Park Drive extension and mitigation has been developed for identified environmental hazards. As

appropriate, future developments within the project site will be required to perform site-specific soil and/or groundwater studies to identify and mitigate potential environmental hazards. The proposed project would not conflict with this action.

Mitigation Measures. Significant impacts related to applicable City of Ventura General Plan policies and actions have not been identified; therefore, mitigation is not required.

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

Impact LU-2 The proposed project would involve the re-designation of about ~~31.4~~56.8 acres of land currently designated Agriculture and subject to the City's SOAR Ordinance to non-agricultural land use designations. However, the necessary findings to allow the City Council to redesignate these lands to a non-agricultural designation can be made. Therefore, this is a Class III, *less than significant*, impact.

About ~~31.4~~56.8 acres of the ~~64.33~~77.2acres within the project site that are designated Agriculture under the Ventura General Plan are subject to the City's SOAR Ordinance per Resolution 2009-032 (see the *Setting* for discussion). The SOAR Ordinance generally prevents changes to the land use category of properties designated Agriculture under the Ventura General Plan unless the land use change is approved by a majority of voters. The City SOAR Ordinance reaffirms and readopts the Agriculture designations defined in the Ventura General Plan until the year 2030. However, SOAR specifies that the City Council may redesignate land designated as Agriculture on the General Plan land use map to a land use other than Agriculture if certain findings are made and supported by the evidence. Each of these findings is listed below, followed by a discussion of whether or not the finding can be made for the proposed project.

i) The land is immediately adjacent to areas developed in a manner comparable to the proposed use.

The ~~31.4~~56.8 acres of lands within the project site boundaries that are subject to SOAR are located adjacent to other areas that are either currently developed with commercial and industrial uses or are proposed for land use designations that would allow such uses in the future. Surrounding uses include auto sales to the north and commercial uses to the northwest. Commercial and industrial uses are not necessarily similar in character to the public golf course to the southwest of the project site; however, such uses would not create any compatibility conflicts with the golf course.

ii) Adequate public services and facilities are available and have the capacity and capability to accommodate the proposed use.

Public services and facilities that would serve the lands that are subject to SOAR are available and have the capacity to accommodate future commercial and industrial uses. As discussed in the Water Supply Assessment for the project (Appendix E) and in Section 4.10, *Utilities and Service Systems*, available water is sufficient to serve future development. The new sewer main, water main, and recycled water line to be built along the Olivas Park Drive extension would be

designed to adequately serve future development and would be constructed prior to occupancy. The VWRF has sufficient capacity to treat wastewater generated by future project site devleopment, as discussed in Section 4.10. As discussed in the Initial Study (Appendix A), police and fire protection service is available in the project area and adequate to serve future development.

iii) The proposed use is compatible with agricultural uses, does not interfere with accepted agricultural practices, and does not adversely affect the stability of land use patterns in the area;

Upon development of the lands subject to SOAR, no agricultural lands would remain on or immediately adjacent to the project site. The nearest lands in agricultural production would be more than 1,000 feet to the west along both sides of Olivas Park Drive. As discussed above, the proposed land uses would be compatible with the existing and planned uses on and adjacent to the project site. No immediately adjacent agricultural uses would remain upon project buildout, while the commercial and industrial uses facilitated by the proposed project would not create compatibility conflicts with agricultural uses that remain in the general vicinity. As such, development of these lands with non-agricultural uses would not interfere with agricultural production or affect the stability of ongoing agricultural activity.

iv) The land proposed for redesignation has not been used for agricultural purposes in the past 2 years and is unusable for agriculture due to its topography, drainage, flooding, adverse soil conditions or other physical reasons; and

~~As discussed in the *Setting*, the only area within the 111.8-acre project site that is currently used for agricultural purposes is a portion of parcel 10 that is north of the proposed Olivas Park Drive extension.~~ As ~~further~~ discussed in the *Setting*, the City Council has already determined that the areas within the project site that are north of the roadway extension are not subject to the SOAR Ordinance. Although certain areas south of the roadway extension that are subject to SOAR have been farmed in the past, none of these areas have been used for agricultural purposes in the past two years. ~~A wastewater treatment facility currently occupies the MCSD parcel.~~

A May 4, 2009 letter from Terry Farms, Inc. to John Hofer (the owner of project site parcels 1-5 and 8-10) documents that the portion of Mr. Hofer's property south of the proposed roadway extension has not been farmed since 2006. That letter also indicates that changes in area drainage, runoff from adjacent commercial properties, and other issues related to incompatibilities with adjacent uses have adversely affected the ability to grow a marketable crop. The fact that the owners of these properties have elected to allow them to lie fallow for an extended period of time suggests that they do not consider them commercial viable for agricultural production. Based on this information, it can be concluded that this area is no longer usable for agriculture despite the fact that the California Department of Conservation continues to designate these areas as Prime and Statewide Importance farmland (for further discussion, please see Section 4.2, *Agricultural Resources*).

v) The land proposed for redesignation pursuant to this subsection (c) does not exceed 40 acres for any one landowner in any calendar year, and one landowner may not obtain redesignation in the Comprehensive Plan of "Agricultural Use" land

pursuant to this subsection (c) more often than every other year. Landowners with any unity of interest are considered one landowner for purposes of this limitation.

The properties currently designated Agriculture for which land use designation changes are being sought range in size from ~~3.18~~6.65 acres to ~~37.32~~37.28 acres~~.~~ None of the landowners involved in this project have other land that is planned for conversion or was recently redesignated; therefore, the redesignation limit of 40 acres per landowner per calendar year would not be exceeded. ~~Consequently, none of the properties exceed the 40-acre maximum and the individual property owners do not have "unity of interest."~~

Mitigation Measures. None required.

Significance After Mitigation. Based on the above discussion, the required findings to allow the City Council to re-designate the project site lands that are subject to the SOAR Ordinance to a non-agricultural use can be made. A final determination with respect to these findings must be made by the Ventura City Council.

Impact LU-3 The proposed project would involve a boundary reorganization with annexation of the MCSD parcel into 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 holds approval authority over several changes of organization that are proposed, including a sphere of influence amendment to include the MCSD parcel, annexation of the same territory to the City, and detachment of the same territory from the Ventura County Resource Conservation District, the Ventura County Fire Protection District, and County Service Areas 32 and 33. Additionally, the (MCSD) would abandon and remove the existing wastewater treatment plant components of the MCSD and the wastewater treated at this facility would be diverted to the City's wastewater facility

Applicable LAFCO policies related to the required changes of organization are discussed below.

Consistency with General and Specific Plans. 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. As noted above, the proposed project includes annexation of the MCSD parcel to the City of Ventura and associated organizational changes. The MCSD parcel is currently designated Agriculture under the Ventura 2005 General Plan, but is proposed to be re-designated as Commerce. This designation would be consistent with the proposed designations for surrounding properties. Assuming that the amendment is approved, annexation would not conflict with the Ventura General Plan. No specific plan applies to the MCSD parcel.

Consistency with Ordinances Requiring Voter Approval. For cities that have enacted ordinances that require voter approval for the extension of services or for changing general plan designations, LAFCo will not approve a proposal unless it is consistent with such ordinances and voter approval has first been granted, or unless exceptional circumstances are shown to

exist. As discussed under Impact LU-2, the MCSD parcel is subject to the City of Ventura SOAR Ordinance, but the Ventura City Council can redesignate such lands to a non-agricultural use if it makes the necessary findings and the findings are supported by the evidence. Based on the discussion under Impact LU-2, the necessary findings can be made. Assuming that the Ventura City Council makes the findings and amends the General Plan land use designation for the MCSD property, there would be no conflict with this LAFCo policy.

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 annexation of the MCSD parcel to the City of Ventura would create a logical boundary and allow that parcel to be developed in a manner similar to what is envisioned for the properties to the east and west. The annexation would ensure that future development on the MCSD parcel would occur within the City of Ventura and, therefore, appears to be consistent with the Guidelines for Orderly Development.

Greenbelts. The County of Ventura and various cities in the County have adopted Greenbelt Agreements for the purposes of preserving agriculture and/or open space, providing separation between cities, and/or limiting the extension of urban services. The Ventura LAFCo is not a direct party to these Greenbelt Agreements, but has endorsed them as statements of local policy. As such, LAFCo will not approve a proposal from a city that is in conflict with any Greenbelt Agreement unless exceptional circumstances are shown to exist. The MCSD property is not subject to an adopted Greenbelt Agreement; therefore, this LAFCO policy does not apply.

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. The MCSD property is designated Agriculture in the Ventura General Plan. However, as shown on Figure 4.2-2 in Section 4.2, *Agricultural Resources*, the Department of Conservation identifies the MCSD property as "Urban and Built Up Land." Presumably, this classification is based on the current use of the property for a wastewater treatment facility. Based on this classification, this LAFCo policy does not apply.

Mitigation Measures. No mitigation is required, though the City would need to approve the proposed General Plan amendments prior to annexation of the MCSD property would be considered by the LAFCo. The boundary reorganization and General Plan amendment are consistent with applicable LAFCo policies.

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

c. Cumulative Impacts. The proposed project involves several General Plan land use designation changes that would facilitate commercial and industrial development within the ~~111.8~~139-acre project site. Buildout of the project site would result in intensification of land use in the site vicinity. Continued buildout of other properties within and around the Auto Center would further contribute to this intensification. However, because of the relatively isolated nature of this area and because planned development in the area is limited to commercial and industrial uses that would generally be compatible with one another, such intensification is not expected to create significant cumulative land use compatibility issues.

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4.9 TRAFFIC AND CIRCULATION

This section evaluates the impacts of the proposed project on the local circulation system. The information has been summarized from the traffic study prepared for the project by Associated Transportation Engineers, dated December 4, 2012. The traffic study is included in its entirety in Appendix F.

4.9.1 Setting

a. Existing Street Network. The project area is served by a circulation system comprised of U.S. Highway 101, arterial streets, and collector streets, as shown on Figure 4.9-1. The following briefly describes the major components of the study area network.

U.S. Highway 101, located along the northern boundary of the study-area, is a multi-lane freeway which serves as a major arterial for the City and is the principal inter-city route along this portion of the Pacific Coast. The segment of U.S. Highway 101 adjacent to the study area is a 6- to 12-lane freeway including auxiliary lanes. Access to the freeway from the study area is currently provided via the interchanges located at Victoria Avenue on the west and Johnson Drive on the east.

Victoria Avenue, located along the western boundary of the study area, is a north-south arterial street which extends northerly from its terminus near the Channel Islands Harbor through the eastern portion of the City to Foothill Road. North of U.S. Highway 101, Victoria Avenue is 6 to 8 lanes wide and south of U.S. Highway 101 it is 4 to 6 lanes wide. Traffic signals and left-turn channelization are present at most intersections along the Victoria Avenue corridor.

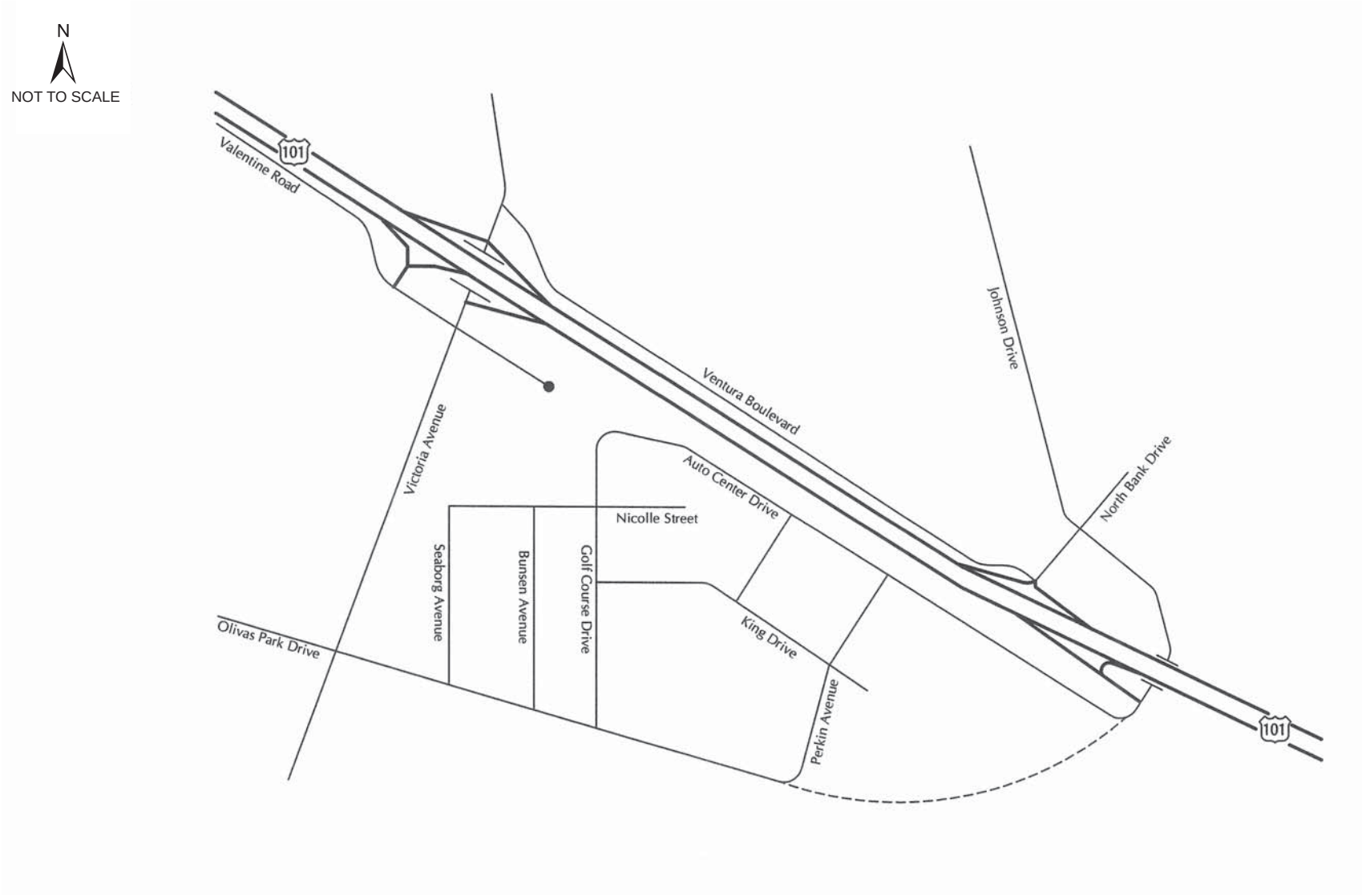
Olivas Park Drive is a 2- to 4-lane east-west roadway extending east of Harbor Boulevard past Victoria Avenue to Perkin Avenue, where it currently terminates.

Johnson Drive is a 2- to 4-lane north-south roadway located east and north of the study area. Johnson Drive currently extends north from U.S. Highway 101 southbound ramps and terminates just south of State Route 126. Johnson Drive serves as a major access route from U.S. Highway 101 to the eastern portion of the City.

Golf Course Drive is a 2-lane roadway running north of Olivas Park Drive to Auto Center Drive. Golf Course Drive provides direct access to commercial and light industrial land uses east of Victoria Avenue.

Auto Center Drive is a 2-lane east-west roadway terminating at Johnson Drive, with additional intersections at Lake Drive and Perkin Avenue. Auto Center Drive provides direct access to the auto dealerships, commercial and light industrial land uses located in the study area.

Perkin Avenue is a 2-lane roadway running south of Auto Center Drive which terminates at its intersection with Olivas Park Drive. Perkin Avenue provides direct access to commercial and light industrial land uses east of Victoria Avenue.



Study Area Street Network

Figure 4.9-1

Source: Associated Transportation Engineers, December 4, 2012.

King Drive is a 2-lane east-west roadway with intersections at Golf Course Drive, Lake Drive and Perkin Avenue. King Drive provides direct access to commercial and light industrial uses east of Victoria Avenue.

North Bank Drive is a 4-lane north-south roadway which provides a connection between the U.S. Highway 101 northbound ramps and Johnson Drive.

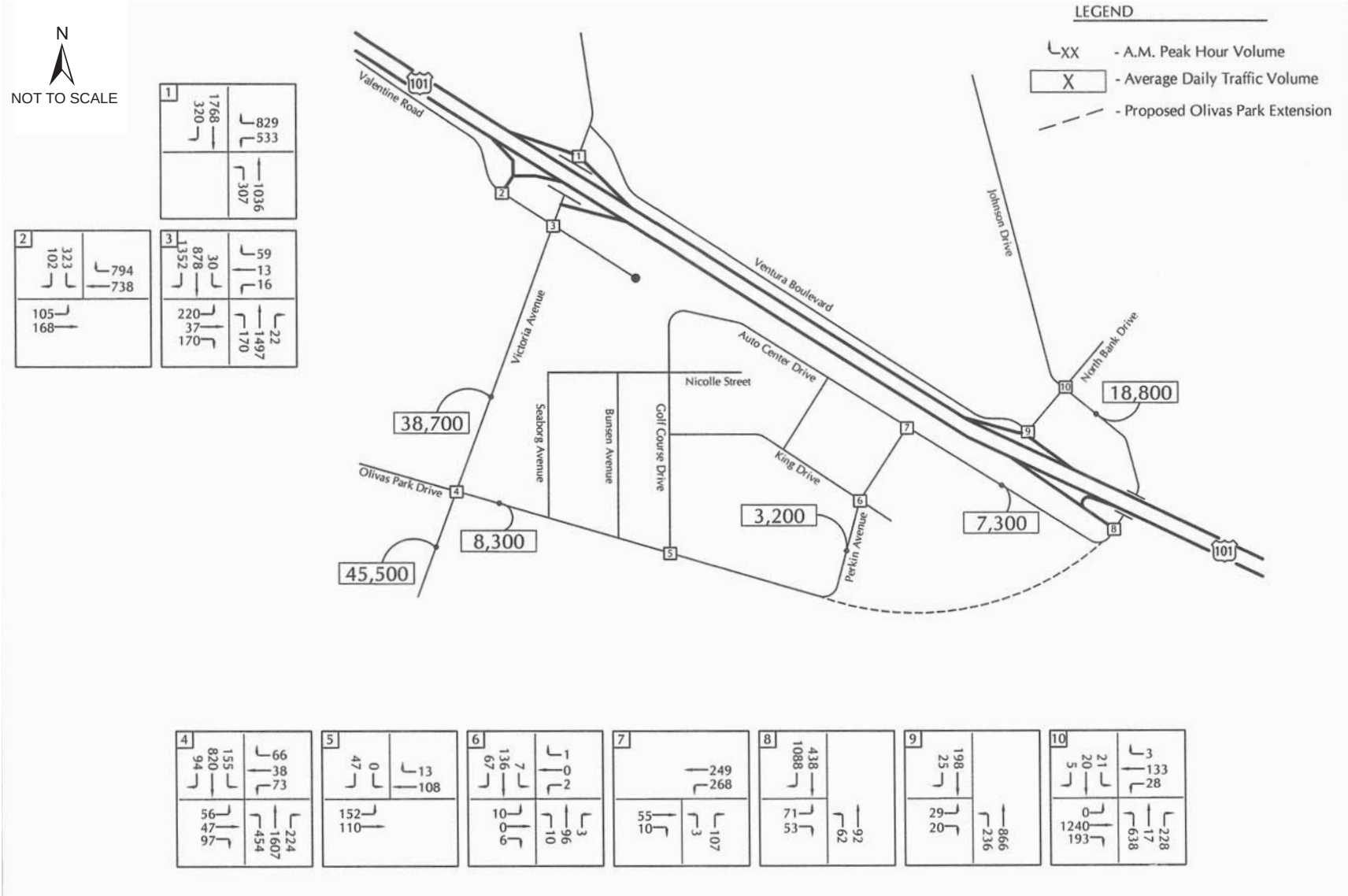
b. Existing Traffic Volumes and Levels of Service. Because traffic flow on urban arterials is most constrained at intersections, a detailed analysis of traffic flow must examine the operating conditions of critical intersections during peak travel periods. The rating of existing or future intersection operations is based on the concept of level of service. In determining the operational characteristics of the study-area intersections with existing or future traffic volumes, "Levels of Service" (LOS) A through F are applied, with LOS A indicating very good operation and LOS F indicating poor operation. The City of Ventura considers LOS E acceptable at freeway interchange intersections. At all other principal intersections within the City, LOS D has been adopted as the peak hour design objective.

Table 4.9-1 lists the intersections that were analyzed during the A.M. and P.M. peak hours. Figure 4.9-2 shows the existing daily and A.M. peak hour traffic volumes for the study area intersections, while Figure 4.9-3 shows the existing P.M peak hour traffic volumes. The peak hour turning volumes for the study intersections were obtained from counts conducted by ATE in October 2010. LOS for the signalized intersections were calculated using the Intersection Capacity Utilization (ICU) methodology. LOS for the unsignalized intersections were determined assuming the locations to be signalized.

Table 4.9-1
Study Transportation Facilities

Roadways	Intersections
1. U.S. Highway 101 2. Victoria Avenue 3. Johnson Drive 4. Olivas Park Drive 5. Perkin Avenue 6. Auto Center Drive	1. U.S. Highway 101 Northbound Ramps/Victoria Avenue 2. U.S. Highway 101 Southbound Ramps/Valentine Road 3. Victoria Avenue/Valentine Road 4. Victoria Avenue/Olivas Park Drive 5. Olivas Park Drive/Golf Course Drive 6. Perkin Avenue/King Drive 7. Perkin Avenue/Auto Center Drive 8. U.S. Highway 101 Southbound Ramps/Johnson Drive

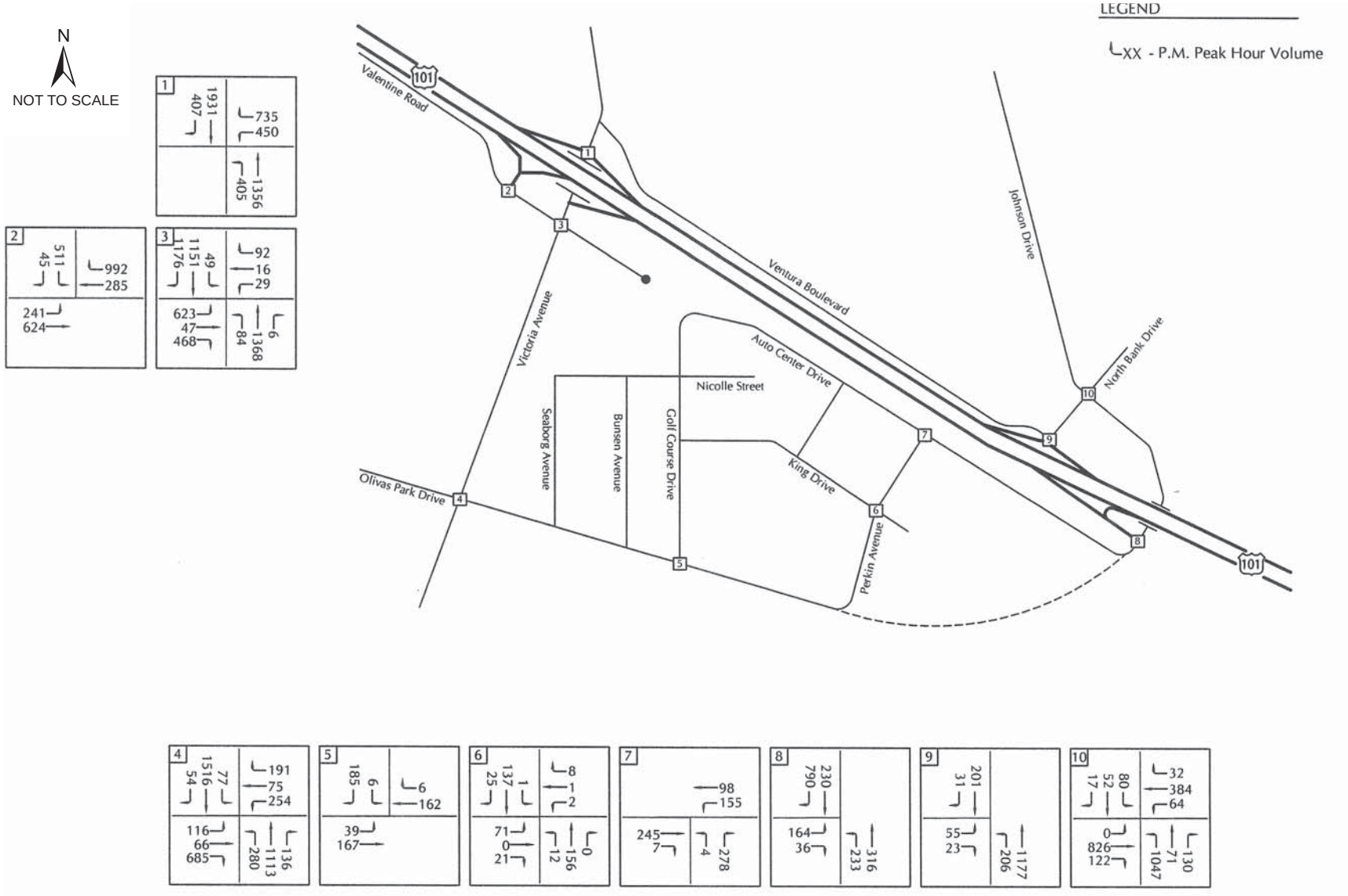
LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. Intersection Level of Service criteria are shown in Table 4.9-2. Level of service calculation worksheets and a brief discussion of the procedures used to calculate intersection levels of service are contained in the Technical Appendix (see Appendix F). The City of Ventura does not have an adopted LOS standard for



Existing Daily and A.M.
Peak Hour Traffic Volumes

Source: Associated Transportation Engineers, December 4, 2012.

Figure 4.9-2



Existing P.M. Peak Hour Traffic Volumes

Source: Associated Transportation Engineers, December 4, 2012.

Figure 4.9-3

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 LOS for existing traffic conditions. The intersection numbering correlates with the numbering system used in the Technical Appendix of the Traffic Report located in Appendix F.

Table 4.9-2
Level of Service Criteria at Signalized Intersections

Level of Service	ICU	Description
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.

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.

Table 4.9-3
Existing A.M. and P.M. Peak Hour Intersection Level of Service

Intersection	Control Type	A.M. Peak Hour		P.M. Peak Hour	
		ICU/Delay	LOS	ICU/Delay	LOS
1. U.S. Highway 101 NB Ramps/Victoria Ave.	Signal	0.58	A	0.61	B
2. U.S. Highway 101 SB Ramps/Valentine Rd.	Signal	0.38	A	0.35	A
3. Victoria Ave./Valentine Rd.	Signal	0.57	A	0.65	B
4. Victoria Ave./Olivas Park Dr.	Signal	0.66	B	0.74	C
5. Olivas Park Dr./Golf Course Dr.[a]	Signal	0.16	A	0.22	A
6. Perkin Ave./King Dr.[a]	Signal	0.15	A	0.17	A
7. Perkin Ave./Auto Center Dr.[(a)]	Signal	0.28	A	0.43	A
8. U.S. 101 Highway SB Ramps/Johnson Dr.	Signal	0.59	A	0.39	A
9. North Bank Dr./Ventura Blvd.[(a)]	Signal	0.68	B	0.74	C
10. Johnson Dr./North Bank Dr.	Signal	0.52	A	0.50	A

[a] *Analyzed as signalized intersections.*

4.9.2 Impact Analysis and Mitigation Measures

a. Methodology and Significance Thresholds. Two traffic analysis scenarios were developed to quantify project-specific impacts. The Current General Plan Buildout (Year 2025) Analysis assumes the adopted land uses and zoning in the City's current General Plan, while the Proposed General Plan Buildout (Year 2025) Analysis assumes development of the land uses facilitated by the proposed General Plan amendments and zone changes. Both scenarios generally assume the same roadway infrastructure in the project site vicinity, except that the proposed extension of Olivas Park Drive would contain two lanes under the current General Plan, but four lanes under the proposed General Plan. Rates published in the Institute of Transportation Engineers (ITE), Trip Generation, 8th Edition for Low Rise Apartment (Land Use Code #221), General Office Building (Land Use Code #710), Shopping Center (Land Use Code #820) and General Light Industrial (Land Use Code #110) were used to develop the trip generation estimates for the two General Plan Buildout land use scenarios.

Performance standards include LOS 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. LOS 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 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 stated previously, traffic volumes expected to be generated by the project were estimated from ITE trip generation rates. Table 4.9-4 shows the estimated trip generation associated with development under the current General Plan as well as with the proposed General Plan amendments. With the proposed General Plan amendments, future project site development would generate an estimated 43,722 average daily trips (ADT), including 1,100 trips during the A.M. peak hour and 3,809 trips during the P.M. peak hour. This represents a net increase of 30,449 ADT, 477 A.M. peak hour trips and 2,524 P.M. peak hour trips as compared to the traffic that would be generated by development under the current General Plan land use designations.

For the current General Plan scenario, Figure 4.9-4 shows estimated ADT and A.M. peak hour traffic volumes at roadways and intersections in the project area in 2025, while Figure 4.9-5 shows estimated P.M. peak hour traffic volumes.

For the proposed project, Figure 4.9-6 shows estimated ADT and A.M. peak hour traffic volumes at roadways and intersections, and Figure 4.9-7 shows estimated P.M. peak hour traffic volumes.

Table 4.9-4
Estimated Trip Generation

Land Use	Size	Annual Daily Traffic	A.M. Peak Hour	P.M. Peak Hour
Current General Plan				
Retail Commercial	300,000 SF	10,302	246	891
Office	50,000 SF	550	78	74
Light Industrial	300,000 SF	2,091	276	291
Residential	50 DU	330	23	29
	Total	**13,273**	**623**	**1,285**
Proposed Project (development with proposed General Plan amendments)				
Retail Commercial	1,258,000 SF	43,199	1,031	3,736
Light Industrial	75,000 SF	523	69	73
	Total	**43,722**	**1,100**	**3,809**
	Net Change	**+ 30,449**	**+ 477**	**+ 2,524**

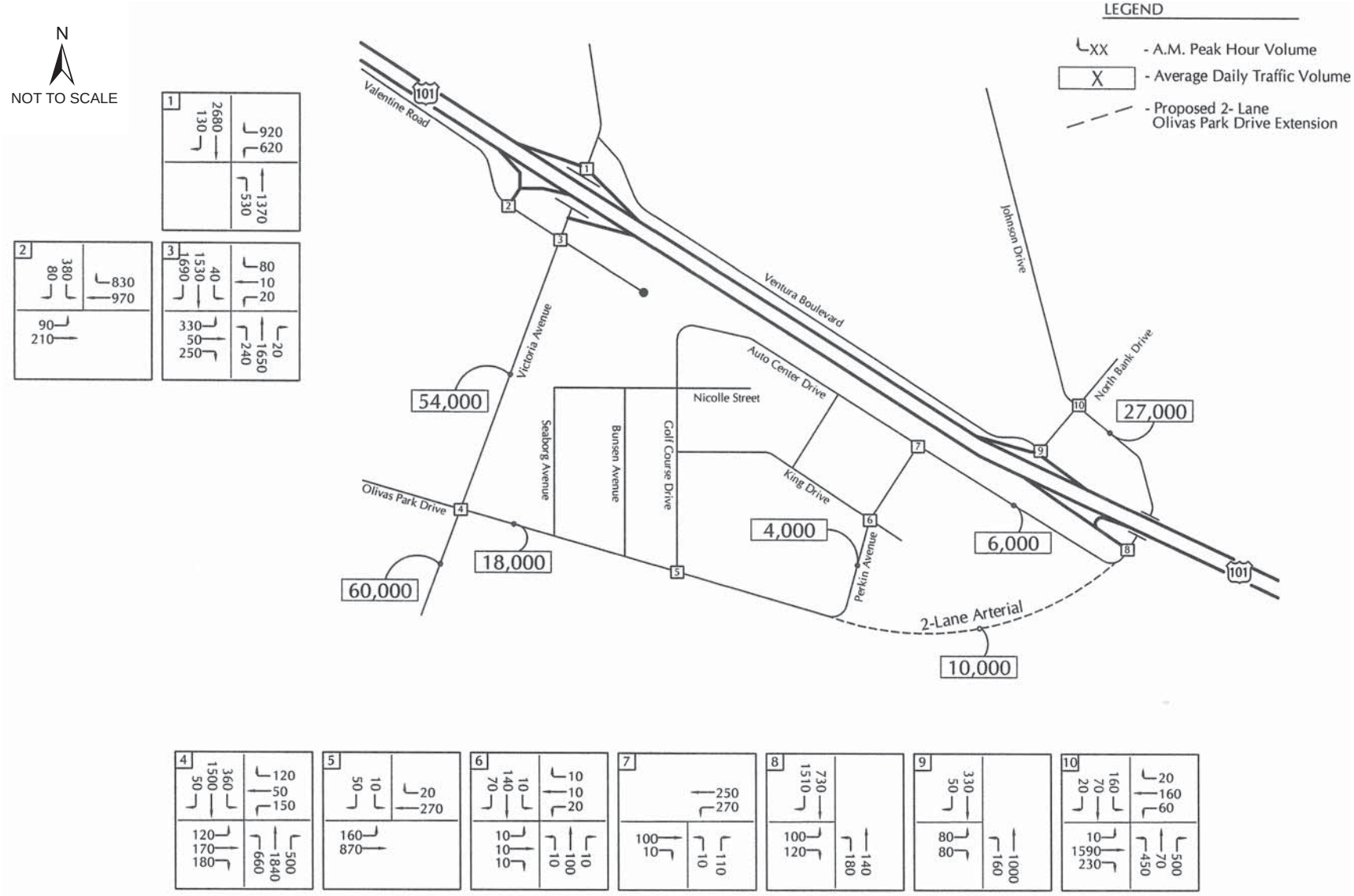
SF = square feet; DU = dwelling units
Source: ATE, Olivas Park Drive Extension Project, City of Ventura, Traffic and Circulation Study. December 2012.

Impact T-1 Development facilitated by the proposed project would increase traffic levels on the local circulation system. Two of the ten intersections in the study area would operate at levels of service that exceed their performance standards. However, ~~M~~mitigation is available for both intersections so impacts would be ~~;~~ ~~however, because needed mitigation at the U.S. 101 Southbound Ramps/Johnson Drive interchange may not be desirable, the impact at that location is considered~~ Class II, *significant, but mitigable ~~and unavoidable~~*.

As discussed above, project-level traffic impacts were determined for the following two scenarios:

1. Current General Plan Buildout (Year 2025)
2. Proposed Project Buildout (Year 2025)

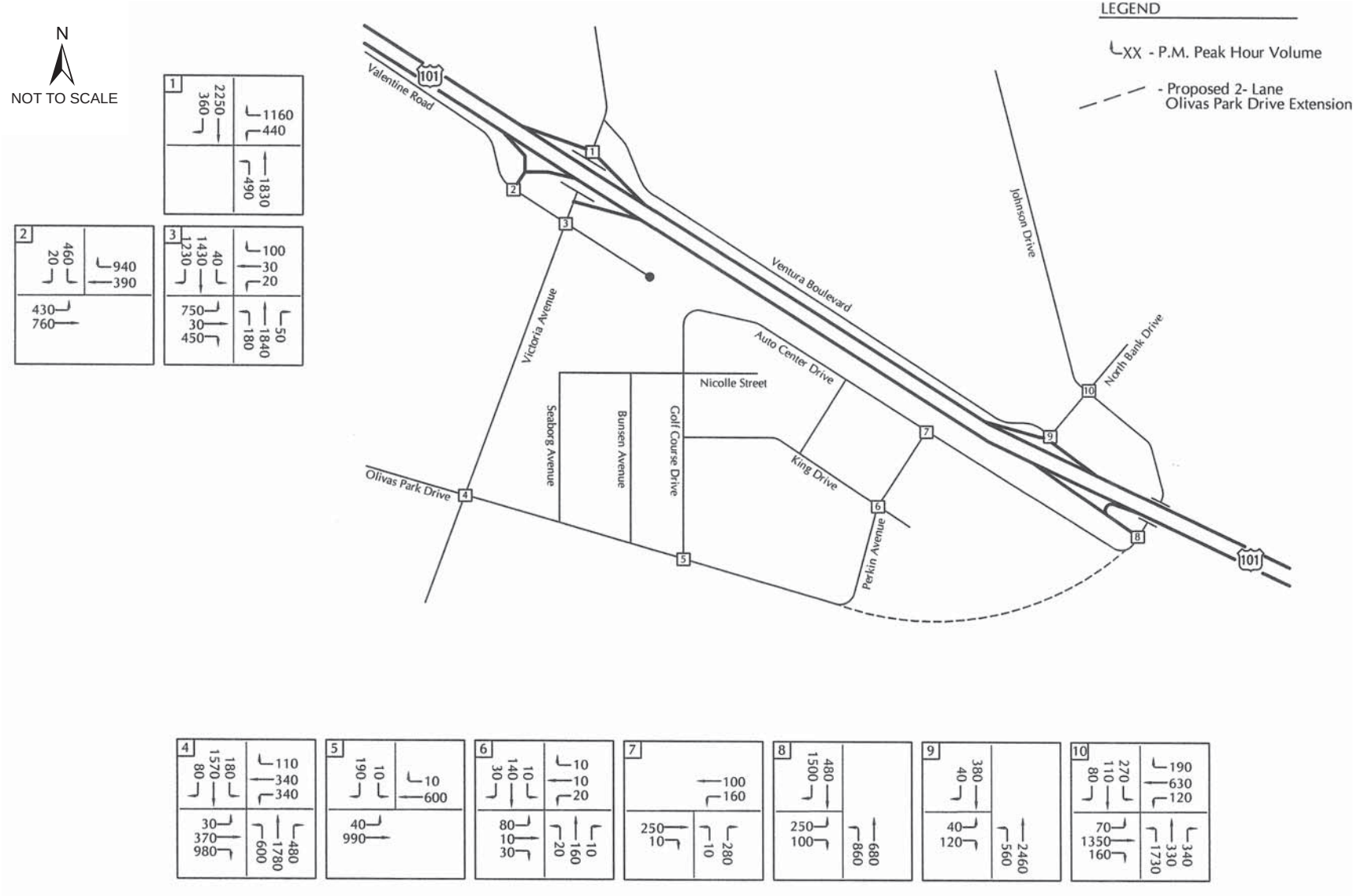
For these scenarios, traffic was assigned to the study area network intersections. Estimated traffic volumes at buildout of the current General Plan land use designations for the project site are shown on Figures 4.9-4 and 4.9-5. Estimated traffic volumes at buildout of the proposed project (with the proposed General Plan amendments) are shown on Figures 4.9-6 and 4.9-7. Tables 4.9-5 and 4.9-6 compare the expected levels of service at all ten intersections in the study area based on each scenario for the A.M. and P.M. peak hours, respectively.



Daily and A.M. Peak Hour Traffic Volumes at Buildout of Current General Plan

Source: Associated Transportation Engineers, December 4, 2012.

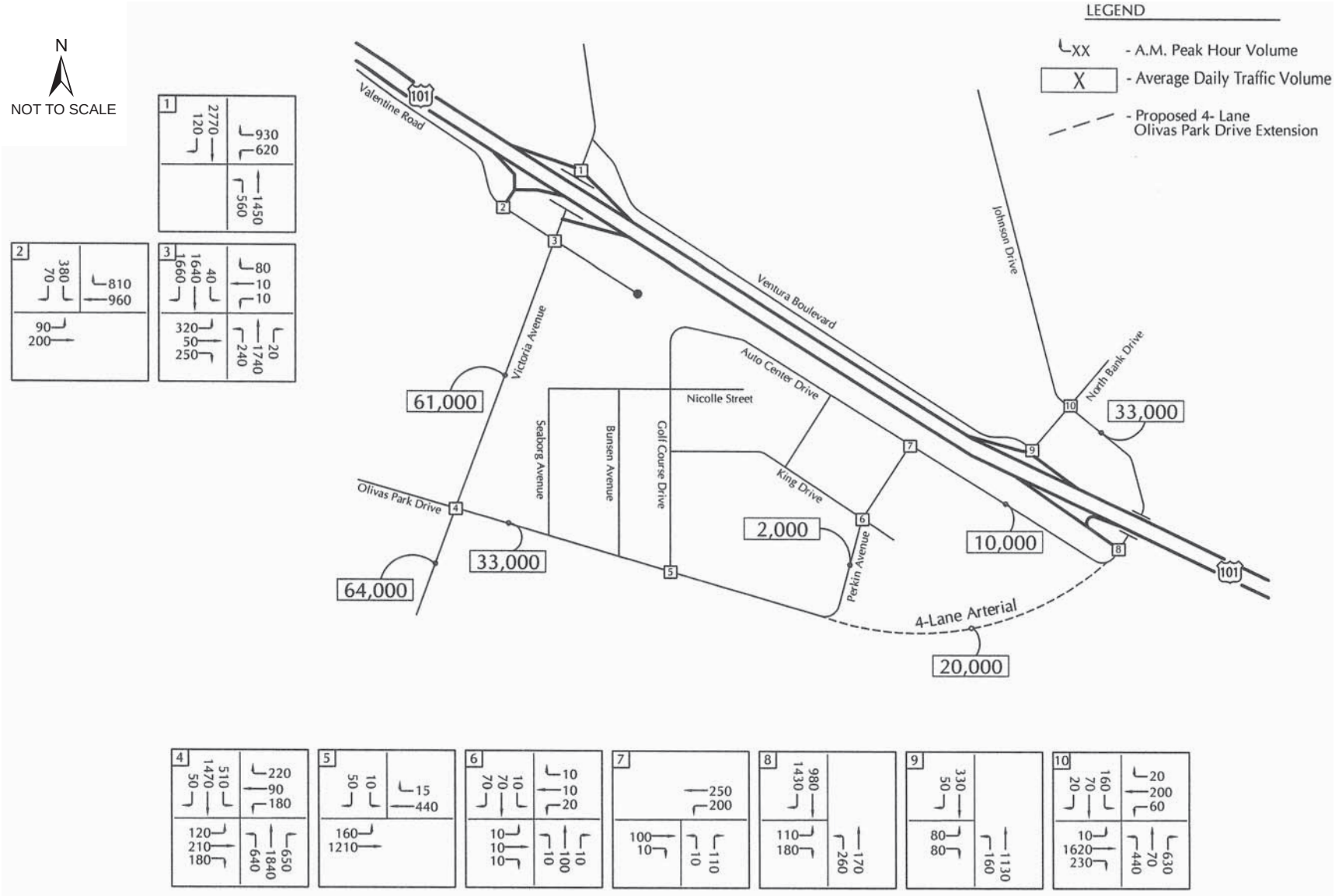
Figure 4.9-4



P.M. Peak Hour Traffic Volumes at Buildout of Current General Plan

Source: Associated Transportation Engineers, December 4, 2012.

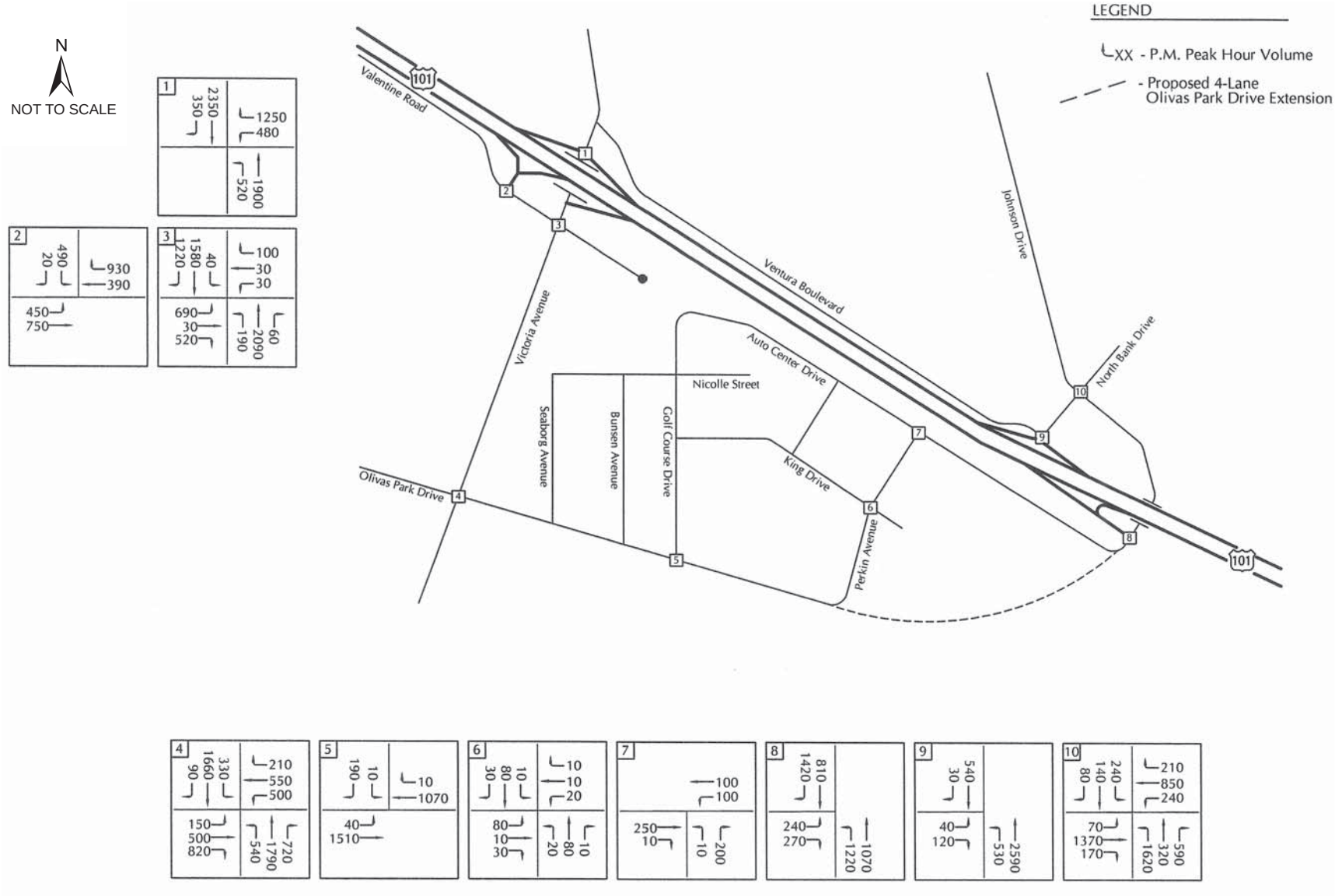
Figure 4.9-5



Daily and A.M. Peak Hour Traffic Volumes at Buildout of Proposed General Plan

Figure 4.9-6

Source: Associated Transportation Engineers, December 4, 2012.



P.M. Peak Hour Traffic Volumes at Buildout of Proposed General Plan

Source: Associated Transportation Engineers, December 4, 2012.

Figure 4.9-7

Table 4.9-5
A.M. Peak Hour LOS and Impacts at Study Area Intersections in 2025

Intersection	Current General Plan		Proposed General Plan		Significant Project Impact
	ICU	LOS	ICU	LOS	
1. Victoria Ave./U.S. Highway 101 NB Ramps	0.78	C	0.80	C	No
2. Valentine Rd./U.S. Highway 101 SB Ramps	0.48	A	0.48	A	No
3. Victoria Ave./Valentine Rd.	0.66	B	0.68	B	No
4. Victoria Ave./Olivas Park Drive	0.66	B	0.72	C	No
5. Olivas Park Dr./Golf Course Road [a]	0.58	A	0.41	A	No
6. Perkin Rd./King Drive [a]	0.18	A	0.14	A	No
7. Perkin Rd./Auto Center Drive [a]	0.32	A	0.27	A	No
8. Johnson Dr./U.S. Highway 101 SB Ramps	0.63	B	0.84	D	No
9. North Bank Dr./Ventura Blvd.	0.41	A	0.45	A	No
10. Johnson Dr./North Bank Dr.	0.75	C	0.84	D	No

[a] *Analyzed as signalized intersections.*
Source: ATE, Olivas Park Drive Extension Project, City of Ventura, Traffic and Circulation Study. December 2012.

Table 4.9-6
P.M. Peak Hour LOS and Impacts at Study Area Intersections in 2025

Intersection	Current General Plan		Proposed General Plan		Significant Project Impact?
	ICU	LOS	ICU	LOS	
1. Victoria Ave./U.S. Highway 101 NB Ramps	0.65	B	0.69	B	No
2. Valentine Rd./U.S. Highway 101 SB Ramps	0.52	A	0.55	A	No
3. Victoria Ave./Valentine Rd.	0.77	C	0.86	D	No
4. Victoria Ave./Olivas Park Dr.	0.83	D	0.99	E	**Yes**
5. Olivas Park Dr./Golf Course Rd.[(a)]	0.74	C	0.59	A	No
6. Perkin Rd./King Dr. [(a)]	0.22	A	0.18	A	No
7. Perkin Rd./Auto Center Dr. [(a)]	0.44	A	0.36	A	No
8. Johnson Dr./U.S. Highway 101 SB Ramps	0.96	E	1.42	F	**Yes**
9. North Bank Dr./Ventura Blvd.	0.87	D	0.91	E	No
10. Johnson Dr./North Bank Dr.	0.82	D	0.89	D	No

[(a)] *Analyzed as signalized intersections.*
Source: ATE, Olivas Park Drive Extension Project, City of Ventura, Traffic and Circulation Study. December 2012.

Tables 4.9-5 and 4.9-6 indicate that significant project impacts would occur at the Victoria Avenue/Olivas Park Drive intersection and the U.S. Highway 101 southbound ramps/Johnson Drive interchange during the P.M. peak hour period. The significant impact at the Victoria Avenue/Olivas Park Drive intersection would be due to the increase in traffic generated onsite, while the significant impact at the U.S. 101/Johnson Drive interchange would be due to the combined effects of the increase in project site-generated trips and the four-lane extension of Olivas Park Drive.

Mitigation Measures. For the Victoria Avenue/Olivas Park Drive Intersection, the following mitigation measure would be required:

T-1(a) Dual Left-turn Lanes at Victoria Avenue/Olivas Park Drive Intersection. On the westbound approach of this intersection, dual left-turn lanes shall be installed to improve traffic conditions to LOS B and D during the A.M. and P.M. peak hour periods respectively. The timing of this improvement will be dependent on traffic volume growth at the intersection, as determined through monitoring by the City.

For U.S. 101 Southbound Ramps / Johnson Drive, the following mitigation measure is required:

T-1(b) Future Development Monitoring. Monitor traffic at the U.S. 101 Southbound Ramps / Johnson Drive intersection ~~the operation of the intersection~~ annually to determine whether ~~and implement trip generation restrictions (when~~ the threshold of ICU – 0.95 ~~is~~ has been reached~~)~~ such that the City's LOS E threshold is ~~not~~ exceeded. ~~The trip generation restrictions will be linked to the issuance of building permits.~~

~~In addition to Mitigation Measure T-1(b), when~~ If the threshold of ICU – 0.95 is reached, ~~one of the following mitigation measures~~Mitigation Measure T-1(c), T-1(d), or T-1(e) ~~could~~ shall be implemented:

T-1(c) Eliminate Left-turns. Left-turns to the southbound ramp at the U.S. Highway 101 Southbound Ramps / Johnson Drive intersection shall be eliminated and a second northbound through travel lane shall be provided from Auto Center Drive to North Bank Drive. In addition, an exclusive right-turn lane on the northbound approach of the Victoria Avenue / Valentine Road intersection shall be required. Johnson Drive shall be re-striped to provide two northbound through lanes under U.S. Highway 101 and a traffic signal shall be installed at the Motel 6 / Johnson Drive intersection. Caltrans approval of the~~se~~ improvements to the U.S. Highway 101 Southbound Ramps / Johnson Drive would be required.

OR

T-1(d) P.M. Peak Hour Only Restriction of Left-turns. Left-turns shall be restricted to the southbound ramp at the intersection during the P.M. peak hour period only. Left-turns shall be allowed during the remainder of the day. This would cause vehicles to divert to the U.S. Highway 101 southbound ramps at Victoria Avenue or make U-turns at the Johnson Drive / Motel 6 Driveway intersection to access southbound U.S. Highway 101 only during the P.M. peak hour between 4:00 P.M. and 6:00 P.M. An exclusive right-turn lane on the northbound approach of the Victoria Avenue / Valentine Road intersection and installation of a traffic signal at the Motel 6 / Johnson Drive intersection would be required as part of this ~~alternative~~measure. Johnson Drive shall be re-striped to provide two northbound through lanes under U.S. Highway 101. Caltrans approval of

these improvements to the U.S. Highway 101 Southbound Ramps/Johnson Drive intersection would be required.

OR

T-1(e) Limit Future Development. Trip generation restrictions shall be required of future development in the project area, and shall be implemented as a condition of building permit issuance, to prevent an exceedance of the City's LOS E threshold at the Johnson Drive and Highway 101 Southbound Ramps intersection.
~~Implement trip generation restrictions such that the City's LOS E threshold is not exceeded. The trip generation restrictions will be linked to the issuance of building permits.~~

Significance after Mitigation. Implementation of Mitigation Measure T-1(a) would improve LOS at the Victoria Avenue/Olivas Park Drive intersection to B and D during the A.M. and P.M. peak hour periods, respectively. At this time, the City has not decided which of the above mitigation measures to select with regard to the U.S. Highway 101 Southbound Ramps/Johnson Drive intersection. Implementation of Mitigation Measure T-1(b) with either Mitigation Measure T-1(c), T-1(d), or T-1(e) would ~~improve the LOS at this intersection to D or better~~ensure that this intersection operates at an acceptable LOS and impacts would be less than significant. ~~However, if the City Council determines that Mitigation Measures T-1(c) or T-1(d) are not feasible or desirable, and therefore should not be implemented, impacts at this intersection would remain significant and unavoidable.~~

Impact T-2 Traffic volumes on roadway segments at buildout of the proposed project would not exceed County thresholds for freeways, state highways, and county roads. Impacts related to roadway segments would be Class III, *less than significant*.

The proposed project would generate traffic on roadway segments as well as at intersections. Table 4.9-7 shows estimated traffic volumes on roadway segments in the project site vicinity at buildout of the project site under the current General Plan and with the proposed project.

The proposed project's impact on traffic volumes on roadway segments was evaluated according to the Ventura County Public Works Agency's thresholds for freeways, state highways, and county roads, as the City of Ventura does not have its own thresholds for roadway segments. Based on the County thresholds, as shown in the Technical Appendix of the Traffic Report located in Appendix F, traffic volumes with the proposed project would not result in exceedances of roadway capacities. Therefore, impacts on roadway segments would be less than significant.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not necessary.

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

Table 4.9-7
Roadway ADT at Year 2025

Location	Current General Plan ADT	Proposed Project ADT
Victoria Avenue n/o Olivas Park Drive	54,000	61,000
Victoria Avenue s/o Olivas Park Drive	60,000	64,000
Olivas Park Drive e/o Victoria Avenue	18,000	33,000
Olivas Park Drive w/o Perkin Avenue	10,000	20,000
Perkin Avenue n/o Olivas Park Drive	4,000	2,000
Auto Center Drive e/o Perkin Avenue	6,000	10,000
Johnson Drive s/o North Bank Drive	27,000	33,000

Source: ATE, Olivas Park Drive Extension Project, City of Ventura, Traffic and Circulation Study. December 2012.

Impact T-3 Through compliance with the City's level of service standards, roadways and intersections in the County's CMP network would be consistent with the CMP LOS E standard. Impacts related to the CMP network would be Class III, *less than significant*.

The 2004 Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. According to the County's Congestion Management Program (CMP), the minimum acceptable standard for traffic operations is LOS E. However, so that local jurisdictions are not penalized for existing congestion, CMP locations currently operating in the LOS F range are considered acceptable.

The study area contains both roadway segments and intersections that are in the County's CMP network. Two roadway segments located along Victoria Avenue are in the CMP network, as are the following intersections: Victoria Avenue / U.S. Highway 101 northbound ramps, Victoria Avenue / Valentine Road and Victoria Avenue / Olivas Park Drive. All of these segments are evaluated and mitigated based on the City's LOS E / D standard (see Impact T-1), which is more stringent than the CMP LOS E standard and none of the CMP segments or intersections are forecast to operate below LOS E. Therefore, the proposed project would not conflict with the County CMP. Impacts would be less than significant.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not necessary.

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

Impact T-4 With adherence to applicable City codes and regulations, development facilitated by the proposed project would not increase traffic-related hazards due to a design feature or incompatible uses or result in inadequate emergency access. Impacts related to traffic-related hazards and emergency access would be Class III, *less than significant.*

The proposed project does not include any roadway design features, such as sharp curves, that could result in safety hazard. The proposed Class II bike lanes along the Olivas Park Drive extension would also reduce the potential for conflicts between motorists and bicyclists; with a width of six feet, these lanes would surpass the Caltrans standard of four feet for Class II bike lanes. To improve pedestrian safety, the proposed project includes eight-foot sidewalks on Olivas Park Drive between Golf Course Drive and Perkin Avenue. East of Perkin Avenue, a 10-foot sidewalk would be constructed on the north side of Olivas Park Drive, although no sidewalk would be built on the south side. These new sidewalks would connect with the existing sidewalk at Auto Center Drive. In addition, any development facilitated by the proposed project would be required to comply with applicable City codes and regulations that govern traffic-related design features and uses, driveways and site access. Applicable codes and regulations that may be required include the Uniform Building Code (UBC), California Building Code (CBC), Uniform Fire Code, and final plan check by the City of Ventura. Implementation of standard conditions and regulations would ensure that adequate design features, uses and sufficient access would be provided within the project site. Therefore, no safety hazards related to roadway design or incompatible uses would occur.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not necessary.

Significance after Mitigation. Impacts related to pedestrian safety would be less than significant without mitigation.

Impact T-5 Development facilitated by the proposed project would be consistent with adopted policies, plans, or programs supporting alternative transportation. Impacts relating to alternative transportation would be Class III, *less than significant*.

The proposed Class II bike lanes along the Olivas Park Drive extension would improve the connectivity of the City's bicycle network, providing a complete linkage between the Ventura Harbor and Johnson Drive. This linkage would implement a section of planned bicycle facilities shown in Figure 4-1 of the City's General Plan. In addition, the City's pedestrian network would be expanded with the completion of sidewalks on Olivas Park Drive between Golf Course Drive and Perkin Avenue. Currently, this section of Olivas Park Drive does not provide safe pedestrian access, as sidewalks on the north and south side of the roadway terminate east of the intersection with Golf Course Drive. The proposed new sidewalk on the north side of the Olivas Park Drive extension would also enable direct pedestrian access between the project area and Johnson Drive. Bicycle and pedestrian improvements would be consistent with Policies 4A

and 4B in the City's 2005 General Plan, which call for a transportation system that is "safe and easily accessible to all travelers" and reduces dependence on automobiles.

Based on the above, development facilitated by the proposed project would not conflict with policies relating to alternative transportation modes. Impacts related to alternative transportation would be less than significant.

Mitigation Measures. Impacts would be less than significant; therefore, mitigation is not necessary.

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

c. Cumulative Impacts. Cumulative traffic level increases are considered in the project impact analysis under Impact T-1. As discussed therein, impacts would be significant ~~and unavoidable~~but mitigable. In order to address the contribution of future development within the project site to cumulative impacts to the County of Ventura road network, future project site developers would be required to pay the County's Traffic Impact Mitigation Fee (TIMF) in accordance with the City's reciprocal fee agreement with the County.

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4.10 UTILITIES and SERVICE SYSTEMS

This section addresses potential impacts related to water supply and wastewater generation.

4.10.1 Setting

a. Water. According to the 2010 UWMP, the City of Ventura obtains water from the following sources:

1. Ventura River Foster Park Area (Foster Park)
   a. Surface Water Intake
   b. Upper Ventura River Groundwater Basin / Subsurface Intake and Wells
2. Casitas Municipal Water District (Casitas)
3. Mound Groundwater Basin
4. Oxnard Plain Groundwater Basin (Fox Canyon Aquifer)
5. Santa Paula Ground Water Basin

The City also provides reclaimed water from the Ventura Water Reclamation Facility. In addition, the City has a 10,000 AFY contract amount from the California State Water Project, which is not utilized within the City service area because there are no facilities to deliver the water to the City.

Table 4.10-1 summarizes available water supply for the City of Ventura.

b. Wastewater. As part of a separate action, the Montalvo Community Services District (MCSD) wastewater treatment facility, is proposed for abandonment. This facility processes about 260,000 gallons per day (GPD) of wastewater (Personal Communication, Kelly Polk, 2009). Because the alignment of the proposed roadway extension and levee / floodwall intersects the MCSD property, the City of Ventura has agreed to divert the wastewater that is currently processed at the Montalvo facility through a tie-in via a 15-inch sewer line to the existing 36-inch Bristol Relief Sewer located in Golf Course Drive. The Olivas Park Drive extension would include wastewater infrastructure to link the existing sewer lines located in Perkin Avenue with the wastewater that is received at the MCSD facility. All wastewater from this vicinity would then be treated at the City's main treatment facility (Ventura Water Reclamation Facility) at Harbor Boulevard.

Local wastewater services are provided to the project site vicinity by the City of Ventura. The Ventura Water Reclamation Facility (WRF) is a permitted tertiary treatment plant with a capacity of 12 million gallons per day (MGD), located at 1400 Spinnaker Drive, in the Ventura Harbor area near the mouth of the Santa Clara River. A minimum of 5.6 MGD of the effluent is discharged to the Santa Clara Estuary as required by the existing Regional Water Quality Control Broad (RWQCB) National Pollution Discharge Elimination System (NPDES) Permit. The remaining effluent is either transferred to recycling ponds, where a portion is delivered as reclaimed water, or lost through percolation or evaporation. Methods for treatment of residual solids include thickening, anaerobic digestion and dewatering by filter presses prior to land application.

Table 4.10-1
Summary of Water Supply Sources (AFY)

Supply	2010	2015	2020	2025	2030	2035
Existing Supplies:						
Casitas Municipal Water District[1]	6,000	6,000	6,100	6,200	6,500	7,000
Mound Basin[2]	4,000	4,000	4,000	4,000	4,000	4,000
Oxnard Plain Basin[2]	4,100	4,100	4,100	4,100	4,100	4,100
Santa Paula Basin[2]	1,600	1,600	1,600	1,600	1,600	1,600
Ventura River (Foster Park)[2]	4,200	4,200	4,200	4,200	4,200	4,200
Recycled Water[3]	700	700	700	700	700	700
Total Existing Supplies	**20,600**	**20,600**	**20,700**	**20,800**	**21,100**	**21,600**
Planned Supplies:						
Santa Paula Basin (Saticoy Well No. 3[4]	0	1,400	1,400	1,400	1,400	1,400
Supplier Produced Surface Water						
Ventura River (Foster Park Wells Improvements)	0	0	2,500	2,500	2,500	2,500
Total Existing and Planned Supplies	**20,600**	**22,000**	**24,600**	**24,700**	**25,000**	**25,500**
FCGMA Groundwater Credit[5]	**30,000**	**22,000**	**22,000**	**22,000**	**22,000**	**22,000**

Source: City of Ventura, 2010 UWMP.

[1] Estimated demand based on population growth within the Casitas service area served by Ventura Water.
[2] Average annual supply based on 2011 City of Ventura Water Master Plan, Table V-14
[3] Based on current and expected usage.
[4] Well will allow full use of 1996 stipulated Judgment allocation.
[5] FCGMA Groundwater Credit is drought/reliability supply source; not a firm supply available for new development. 30,249 AF available for 2010 per Water Master Plan (See Oxnard Plain supply description in Section 3.3.1.2 of the 2010 UWMP) reduced to 22,000 AF by 2015 in the event of a drought or operational/production/treatment constraints from other supply sources.

Currently, the Ventura WRF is averaging approximately 10 MGD (Don Burt, 2008). With a designed capacity of 14 MGD, there is a surplus of approximately 4 MGD.

c. Regulatory Setting. The most recently adopted UWMP (2010) for the City of Ventura projects future demand based on General Plan buildout to the year 2035, with an estimated population projection of 140,472 in 2035.

4.10.2 Impact Analysis

a. Methodology and Significance Thresholds.

Significance Thresholds. The following questions from Appendix G of the CEQA Guidelines are used to assess the potential for significant environmental impacts related to utilities and service systems. Significant impacts would occur if the project would:

> *Exceed wastewater treatment requirements of the applicable Water Quality Control Board?*
> *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?*
> *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?*
> *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*
> *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?*
> *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*
> *Comply with federal, state, and local statutes and regulations related to solid waste.*

Impacts to drainage infrastructure are discussed in Section 4.7, *Hydrology and Water Quality*. Impacts regarding landfill capacity and compliance were found to be less than significant and are discussed in the Initial Study prepared for this project (refer to Appendix A).

b. Project Impacts and Mitigation Measures.

Impact U-1 Water demand generated by the proposed project would not substantially deplete groundwater resources as there is sufficient water supply to serve the proposed project. Impacts to water supply would be Class III, *less than significant*.

The WSA prepared for the proposed project determined that water demand for development accommodated in the project area would be 379 AFY. Table 4.10-2 shows the estimated water demand generated by the proposed project. The 379 AFY increase in demand resulting from

the proposed project represents approximately 1.9% of the projected 2015 annual citywide target demand (20,163 AF).

Table 4.10-2
Estimated Water Demand of the Proposed Project
Based on a Maximum Development Scenario

Use	Unit(s)	Water Duty Factor	Water Demand GPD	Water Demand AFY
		Quantity[1]		
Commercial	1,258,000 sf	250 gpd/1,000 sf	314,500	352
Industrial	75,000 sf	315 gpd/1,000 sf	23,625	27
Total Demand with Proposed General Plan Amendments			**338,125**	**379**

1. Duty factors are consistent with the City of Ventura 2005 General Plan EIR.
sf = square feet
AFY= acre-feet per year
GPD = gallons per day

An increased water demand of 379 AFY generated by the proposed project could be accommodated by the normal year surplus of 1,487 AF in 2015 (WSA, 2013). In addition, the additional 379 AFY of demand could be accommodated by the surplus in a single-dry year scenario through the year 2035. However, projected water demand would exceed the projected supply in Year 3 of a multiple dry year scenario from 2015 through 2035, requiring the use of banked groundwater. With the additional 379 AFY required by the proposed project, 89 AFY of banked groundwater would be required in a multiple dry year scenario in the year 2015; 115 AFY of banked groundwater would be required in a multiple dry year scenario in the year 2020; 987 AFY of banked groundwater would be required in a multiple dry year scenario in the year 2025; 1,898 AFY of banked groundwater would be required to meet demand in a multiple dry year scenario in 2030; and 2,464 AFY of banked groundwater would be required to meet demand in a multiple dry year scenario in 2035 (WSA, 2013). Banked groundwater totals 22,000 AFY through 2035 (WSA, 2013). Therefore, banked groundwater would be sufficient to accommodate the additional demand generated by the proposed project in all multiple dry year scenarios through 2035. As such, impacts to water supply would be less than significant.

Based on the 2010 UWMP, there is adequate water to supply the proposed project under the normal, single dry year, and multiple dry year scenarios over the next 20 years. However, recent developments related to supply constraints along with the list of approved projects triggered the need for a reevaluation of water needs. A report was recently completed entitled the "2013 Comprehensive Water Resources Report" (RBF Consultants, June 2013). That report included information on tightening water supply restrictions and water demand estimates based on existing demands as well as estimated demands for approved development projects. The results of that report indicate that "the spread between the current water demand and the current water supply is very tight, and in some conditions the supply could be less than the demand. This presents challenges for the City moving forward in the ability to allocate water supply to development projects that will generate additional water demands." Based on these

findings, future development within the project site would be subject to the following features related to water supply:

1. All property within the project site boundary shall turn over water rights to the City (at a maximum the City currently believes 99 AF based on 66 acres per the General Plan acreage, but could be nothing if Fox Canyon GMA does not grant the conversion from agricultural lands to municipal / industrial purposes .

For any additional water needs over the above water rights given to the City the following shall be used:

2. All development shall be served (and construct systems) by reclaimed water.
3. All property owners shall agree to utilize best management practice (BMP) low water use standards.
4. Water in-lieu fee payments shall be made if such a system is put in place; if no fee is in place then the applicants will acquire water rights to transfer to the City.
5. Water demand for project site developments shall be added to the City's Water Demand / Supply Matrix. Each individual parcel developed will be re-evaluated and approved contingent upon an adequate supply of water.

Mitigation Measures. Mitigation is not required since significant impacts have not been identified. Nevertheless, project site developments will be subject to the features listed above. In addition, the following General Plan actions related to the provision of water service would apply to City approval of individual project site developments:

Approve new projects contingent upon an adequate supply of water.

Require low flow fixtures, leak repair, and drought tolerant landscaping (native species if possible), plus emerging water conservation techniques, such as reclamation, as they become available.

Require project proponents to conduct evaluations of the existing water distribution system, pump station, and storage requirements for the proposed development in order to determine if there are any system deficiencies or needed improvements for the proposed development.

Require new projects to dedicate water rights and pay an "in lieu" fee.

Significance after Mitigation. Impacts would be less than significant without mitigation. Implementation of applicable standard requirements, including conducting demand supply analysis for individual development projects, would ensure the availability of water prior to approval of building permits for future project site developments.

Impact U-2 The City of Ventura Water Reclamation Facility would have sufficient capacity to serve project area development, as well as the additional wastewater that would be transferred from the abandoned Montalvo Community Services District wastewater treatment facility. Impacts to wastewater treatment, capacity, and facilities would be Class III, *less than significant*.

The City of Ventura provides local wastewater services to the project site vicinity. The Ventura Water Reclamation Facility (VWRF) is a permitted tertiary treatment plant with a capacity of 12 MGD, located at 1400 Spinnaker Drive, in the Ventura Harbor area near the mouth of the Santa Clara River. A minimum of 5.6 MGD of the effluent is discharged to the Santa Clara Estuary as required by the existing Regional Water Quality Control Broad (RWQCB) National Pollution Discharge Elimination System (NPDES) Permit. The remaining effluent is either transferred to recycling ponds, where a portion is delivered as reclaimed water, or lost through percolation or evaporation. Methods for treatment of residual solids include thickening, anaerobic digestion and dewatering by filter presses prior to land application.

Currently, the VWRF is averaging approximately 8.8 MGD (John Willis, 2013). With a design capacity of 12 MGD, this leaves 3.2 MGD of available capacity. Neither the proposed road extension nor the proposed levee would generate wastewater. The commercial development facilitated by the proposed General Plan amendment (up to 1,258,000 square feet) would generate an estimated 352,240 GPD of wastewater (based on 280 gallons per 1,000 square feet of non-residential development, per the 2005 General Plan Final EIR). The industrial development facilitated by the proposed General Plan amendment (up to 75,000 square feet) would generate an estimated 21,000 GPD of wastewater. The total estimated wastewater generated per day would be approximately 373,240 gallons.

The Montalvo Municipal Wastewater Treatment facility, which processes about 260,000 GPD of wastewater (personal communication, Kelly Polk, 2009), is proposed for abandonment. Because the alignment of the proposed roadway extension and levee/floodwall intersects the MCSD property, the City of Ventura has agreed to divert the wastewater that is currently processed at the MCSD facility through a tie-in via a 15-inch sewer line to the existing 36-inch Bristol Relief Sewer located in Golf Course Drive. The Olivas Park Drive extension would include wastewater infrastructure to link the existing sewer lines located in Perkin Avenue with the wastewater that is received at the MCSD facility. All wastewater generated at and diverted from the project site would then be treated at the VWRF at Harbor Boulevard.

Combined with the wastewater generated by the commercial and industrial development facilitated by the proposed General Plan amendment, the total volume of new wastewater that would be sent to the VWRF would be approximately 633,240 GPD. The additional wastewater would be approximately 20% of the current available capacity (4.2 MGD) of the VWRF. As such, the VWRF would have sufficient capacity to serve the proposed project and additional wastewater previously treated by the MCSD treatment facility. No expansion of facilities beyond what is included as part of the proposed project would be required.

Mitigation Measures. Mitigation would not be required.

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

c. Cumulative Impacts. The water supply analysis under Impact U-1 considers cumulative development through 2035. Because current and projected water supplies are sufficient to meet cumulative demands under all scenarios through 2035, cumulative impacts to water supply would not be significant.

The June 2013 Comprehensive Water Resources Report described above under Impact U-1 estimates water demand for projects currently under construction and approved projects at 930,255 GPD. This includes 660,680 GPD for residential uses, 144,225 GPD for commercial uses, and 125,350 gpd for hospital uses. Based on the return-to-sewer ratios contained in the City's 2010 Wastewater Master Plan, wastewater is 80% of water demand for commercial / industrial uses, 71% of water demand for hospital uses, and 69% of demand for residential uses. Based on these rates, current and approved projects would generate an estimated 660,300 GPD of wastewater. When added to the 633,240 GPD from the proposed project (including wastewater generated by future development and wastewater diverted from the Montalvo facility), the overall increase in wastewater being sent to the VWRF would be just under 1.3 MGD. This is about 40% of the remaining capacity of the facility. Because cumulative wastewater generation can be met without facility expansion, cumulative impacts related to wastewater would not be significant.

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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; (2) significant and irreversible impacts on the environment, and (3) impacts on energy and energy conservation.

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

The proposed project does not include any housing that would generate population growth. However, construction of the proposed roadway extension and levee would generate short-term employment opportunities and the proposed General Plan amendments and zoning changes would facilitate future development that could generate economic growth. Future development facilitated by the General Plan amendments and zoning changes would generate an estimated maximum of 2,500 permanent jobs associated with the proposed commercial and industrial space. The economic growth that could be accommodated under the proposed project would have economic benefits in terms of short- and long-term jobs as well as City tax revenues. 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 24-34% 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.

Although some jobs generated by implementation of the proposed project would likely be filled by current residents of Ventura, other new job opportunities would likely be filled by people relocating to the area. In this way, the proposed General Plan amendments and zoning changes may indirectly generate population growth in the area. The number of relocatees and the location in which they would reside cannot be predicted with any certainty, but it is likely that the proposed General Plan amendments and zoning changes would contribute to housing demand in the City of Ventura. According to the Southern California Association of Governments Profile of the City of San Buenaventura, there were 58,926 jobs in Ventura and 42,827 housing units. Development facilitated by the proposed project could increase pressure for additional housing development and/or tend to drive up housing prices. It is anticipated that this additional housing demand would be accommodated through buildout of lands designated for residential use in the City's General Plan. In addition, jobs within the City of Ventura are partially filled by residents in neighboring communities, such as Ojai, Oxnard, and Camarillo. The City of Ventura also has a current unemployment rate of 7.7%, according to the California Employee Development Department (2013). Commercial and industrial development

facilitated by the proposed project would help offset the high unemployment rate experienced within Ventura.

5.1.2 Removal of Obstacles to Growth

A physical obstacle to growth typically involves the lack of public service infrastructure. Similarly, the elimination or change in a regulatory obstacle, including existing growth and development policies, can result in new population growth.

The proposed project includes infrastructure improvements to the roadway of Olivas Park Drive, addition of new storm drains, and construction of a new levee. Future development facilitated by the General Plan amendments and zoning changes would also require extension / expansion of public service infrastructure to serve development. New infrastructure that would be required includes the addition of new stormwater drainage facilities and new water , recycled water, and wastewater infrastructure that would connect to existing infrastructure. The potential for each of these types of infrastructure to induce growth is discussed below.

Levee Improvements. Construction of the proposed levee could remove physical obstacles to growth in the project area by reducing the floodplain. The levee would remove approximately 107 acres from the 100-year floodplain. However, construction of the levee is part of a long-term plan to remove existing developed areas from the floodplain and to protect future development. Because the levee would serve existing development in the project area and any new development facilitated by the proposed project, additional growth beyond the proposed project would not be anticipated.

Olivas Park Drive Extension. The proposed roadway extension was identified in the 2005 General Plan as a future improvement. As such, the proposed roadway extension would not constitute a substantial new roadway and is accounted for in the City's General Plan. The roadway improvements would serve the existing project area and any new development facilitated by the proposed project. Therefore, the roadway extension would not be anticipated to promote additional growth beyond the proposed project.

Stormwater Infrastructure. The proposed project includes the extension of stormwater drainage facilities within the proposed roadway extension and levee. New facilities are anticipated to be sized to meet the needs of existing and future development in the project area. These facilities would not accommodate development beyond the maximum buildout of the project site or more intensive development outside of the project area, and hence, would not remove an existing obstacle to future growth.

Water, Recycled Water, and Wastewater Infrastructure. The proposed project includes closure of the existing MMID wastewater treatment facility and diversion of wastewater treated at that facility to the City's Wastewater Reclamation Facility via a new sewer main to be constructed underneath the Olivas Park Drive extension that would connect to an existing main underneath Olivas Park Drive at Golf Course Drive. The new sewer line connection would facilitate development of the project site, but would not expand the City's overall treatment capacity or ability to provide wastewater service to other areas of the City. Future development facilitated by the General Plan amendments and zoning changes would be required to provide connectivity to the existing water, recycled water, and wastewater infrastructure in the project area. These facilities

would not be designed to accommodate additional development beyond the proposed project or more intensive development outside of the project area, and would not remove an existing obstacle to future growth.

5.2 IRREVERSIBLE ENVIRONMENTAL EFFECTS

The *CEQA Guidelines* Section 15126.2(b) requires 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, and irreversible impacts associated with the proposed project.

Construction of the roadway extension and levee, as well as future project site development, 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.

Additional vehicle trips associated with future development facilitated by the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions. As discussed in Section 4.9, *Traffic and Circulation*, impacts resulting from traffic generated by future development could be mitigated to a less than significant level. ~~However, if Mitigation Measure T-1(c) or T-1(d) is not implemented, traffic-related impacts at the intersection of U.S. Highway 101 Southbound Ramps/Johnson Drive would remain significant and unavoidable.~~

As discussed in Section 4.2, *Air Quality*, and Section 4.5, *Greenhouse Gas Emissions (GHG)*, future developments facilitated by the proposed project would be required to prepare a project-specific analysis of air quality and GHG emissions. If a specific project is determined to exceed air pollutant emissions thresholds, the applicant would be required to implement emission reduction measures such as requiring energy efficiency standards 20 percent beyond Title 24 requirements for commercial and industrial buildings, preparation of a Transportation Demand Management Plan, and contribution toward a regional Air Quality Mitigation fund to offset air pollutant emissions for any emissions above 25 pounds per day, after other mitigation measures have been implemented. Future development that generates emissions exceeding GHG emissions would be required to implement a GHG Reduction Plan and may be required to purchase carbon off-sets if emissions cannot be reduced below thresholds.

Implementation of the proposed project would convert up to ~~43.36~~29 acres of Prime Farmland and ~~18.32~~1-2 acres of Farmland of Statewide Importance lands to non-agricultural uses. As discussed in Section 4.2, *Agricultural Resources*, the conversion of this land would be a significant and unavoidable impact. Therefore, the conversion of Prime and Statewide Importance Farmland to non-agricultural uses would be an irreversible environmental effect of the proposed project.

~~Add something re: cumulative aesthetic impact here.~~Project-specific aesthetic impacts would not occur. However, the proposed project would ~~add~~contribute to a significant cumulative

visual character impact related to the conversion of agricultural lands to non-agricultural uses. As discussed in Section 4.1, *Aesthetics*, cumulative aesthetic impacts have been identified as significant and unavoidable.

5.3 ENERGY EFFECTS

The *CEQA Guidelines* Appendix F requires that EIRs include a discussion of the potential energy consumption and/or conservation impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful or unnecessary consumption of energy.

As discussed previously, construction of the roadway extension and levee would involve the use of energy during the construction and operational phases of the project. Energy use during the construction phase would be in the form of fuel consumption (i.e.: gasoline and diesel fuel) to operate heavy equipment, operate light-duty vehicles, operate machinery, and to operate generators for lighting. In addition, temporary grid power may also be provided to any temporary construction trailers or electric construction equipment. The operation of the proposed roadway extension would incrementally increase energy consumption in the City, as the operation of streetlights and stop lights along the proposed roadway would consume grid power.

Potential future commercial and industrial development within the project area would require energy for both the site construction and operation. Energy use during any future construction phase would be in the form of fuel consumption temporary grid power. Long-term operation of potential future commercial and industrial development would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. In addition, any increase in vehicle trips associated with new commercial uses would increase fuel consumption within the City.

The temporary construction and long-term operation of the proposed project would incrementally increase local demand for non-renewable energy resources such as electricity, petroleum and natural gas. However, increasingly efficient building fixtures and automobile engines are expected to offset the demand to some degree. In addition, all future development would be subject to the energy conservation requirements of the Title 24 of the California Administrative Code. The remaining incremental increase in energy consumption would be further offset by the City's continuing efforts to comply with their Environmental Sustainability Strategy (ESS), which has helped to facilitate approximately $2.1 million in energy savings over the last four years through the aggressive pursuit of energy and fuel efficient practices (City of Ventura 2012). The ESS also establishes energy reduction strategies for new construction, infrastructure systems, and waste collection. Continued implementation of the ESS and compliance with Title 24 and other energy conservation requirements on all future development would ensure that energy is not used in a wasteful manner.

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 project. The following alternatives are evaluated:

Alternative 1: No Project (no development - no change to existing land uses)

Alternative 2: Existing General Plan

Alternative 3: Olivas Park Drive Extension Only

Alternative 4: Minimal Prime/Statewide Importance Farmland Conversion

The characteristics and environmental impacts of each of these alternatives are described below, followed by discussions of alternative sites and the environmentally superior alternative among the studied alternatives.

6.1 ALTERNATIVE 1: NO PROJECT – NO BUILD

This alternative assumes that the proposed Olivas Park Drive extension and levee are not built and that none of the proposed General Plan designation or zoning changes occurs. Thus, the project site would remain in its current condition. Implementation of the No Project alternative would not, however, preclude future development within the project site in accordance with the current Ventura General Plan.

The No Project alternative would avoid the proposed project's environmental impacts in every issue area studied in the EIR. Thus, it would have less overall environmental impact than the proposed project and the proposed project's unavoidably significant impact related to conversion of Prime and Statewide Importance farmland to non-agricultural use would be eliminated. Under this alternative, however, any pesticide use associated with ongoing agricultural activity would continue and existing soil and groundwater contamination issues on the project site would not be addressed.

The No Project Alternative would also not achieve any of the objectives of the proposed project: (1) improving circulation in the area by providing a link between Johnson Drive and the current terminus of Olivas Park Drive; (2) protecting existing and future development in the project site vicinity from flooding along the Santa Clara River; (3) allowing for the logical development of the project site vicinity with commercial and industrial uses compatible with those within and around the Ventura Auto Center; and (4) allowing for commercial development that would provide local jobs and increase the City's sales tax base.

6.2 ALTERNATIVE 2: EXISTING GENERAL PLAN

This alternative would allow for development under the existing City of Ventura General Plan and zoning. Thus, land use designations and zoning classifications would remain as shown on Figure 2-3 in Section 2.0, *Project Description*. As indicated in Table 6-1, buildout of the project site under this alternative would involve up to 50 dwelling units and 650,000 square feet of non-

residential development, including 350,000 square feet of commercial (retail and office) development and 300,000 square feet of light industrial development.

Table 6-1
Alternative 2 Buildout Characteristics

Land Use	Size
Retail Commercial	300,000 SF
Office	50,000 SF
Light Industrial	300,000 SF
Residential	50 DU

As with the proposed project, this alternative would include the extension of Olivas Park Drive, the proposed levee, and other associated infrastructure improvements. The remainder of that portion of the site designated Agriculture (about ~~45~~ 75 acres) would remain in its current condition with a mix of agriculture (on a portion of Parcel 10) and vacant land.

This alternative would meet project objectives related to improving circulation and protecting future development from flooding. It would also partially meet objectives related to development of the project site with commercial and industrial uses and allowing for commercial development that would provide local jobs and increase the City's sales tax base, though to a lesser degree than the proposed project.

6.2.1 Aesthetics

Approximately ~~45~~ 76-77 acres of the ~~111.8~~139-acre project site would remain in their current condition under this alternative. The portion of Parcel 10 that is north of the Olivas Park Drive extension may continue to be farmed, but the remainder of the ~~45~~ 75 acres is anticipated to remain as vacant land. The lands to be developed with non-agricultural uses would include a mix of commercial, industrial, and residential uses. The overall development intensity in the area would be reduced, but may ultimately result in a more disjointed visual character with a mix of commercial / industrial, residential, agricultural uses, as well as tracts of vacant land. Remaining vacant lands may continue to suffer from lack of maintenance, thus detracting from the visual character of the area. As with the proposed project, this alternative would not adversely affect views of identified scenic resources or create significant light or glare impacts. Aesthetic conditions would be somewhat different than under the proposed project, but overall visual impacts associated with this alternative would be about the same as those of the proposed project and would be less than significant.

6.2.2 Agricultural Resources

Under this alternative, the ~~60~~ 85 acres within the project site that are currently designated Agriculture under the Ventura General Plan would retain that designation, though about ~~15~~ 8-9

of these acres would be used for the Olivas Park Drive extension and levee. Consequently, although most of this area is not currently farmed, this alternative would reduce, but not eliminate, the proposed project's unavoidably significant impact related to development of Prime and Statewide Importance farmlands with non-agricultural uses. Mitigation required for the proposed project would apply, but the size of the required agricultural easement would be smaller. This alternative may result in greater compatibility conflicts between agricultural and non-agricultural uses if existing agricultural activity onsite continues in the future. Nevertheless, overall agricultural resource impacts would be lower under this alternative than under the proposed project.

6.2.3 Air Quality

Overall temporary impacts resulting from construction would be somewhat lower under this alternative since about ~~45~~ 85 acres of the site would not be developed. The same standard dust control mitigation would apply. Similar to the proposed project, the impact would be less than significant.

This alternative would accommodate about 70% less future development than the proposed project. Therefore, operational emissions would be commensurately lower. Emissions would still exceed Ventura County APCD thresholds and the recommendations recommended for the proposed project would apply. Overall TDM fees would be lower, though the fees for each individual development within the project site would be roughly the same as for the proposed project.

6.2.4 Biological Resources

This alternative would include the proposed road extension and levee that are part of the proposed project, and would also facilitate future development of the same areas to be developed under the proposed project. Consequently, although overall development intensity would be lower under this alternative, the potential disturbance to biological resources would be the same. Biological resource impacts would be similar to those of the proposed project and all mitigation recommended for the project would apply. As with the proposed project, impacts would be significant, but mitigable.

6.2.5 Greenhouse Gases

Overall project site development would be about 70% lower under this alternative than under the proposed project. Consequently, overall construction-related and operational GHG emissions would be commensurately lower. As with the proposed project, impacts would be significant, but mitigable. Mitigation recommended for the proposed project would apply, though the overall reduction in emissions needed to reduce emissions below threshold levels would be lower.

6.2.6 Hazards/Hazardous Materials

This alternative includes the same road extension and levee that would be part of the proposed project. Consequently, the potential hazardous material issues associated with these

infrastructure improvements would be the same and the same mitigation program would apply to reduce impacts to below a level of significance. About 45 acres of the project site would not be developed under this alternative; therefore, the potential for future development to encounter hazardous material issues would be lower. On the other hand, implementation of this alternative would be less likely to address any potential hazardous material issues that may be present on the properties that are to remain designated for agricultural use. In addition, any remaining or future agricultural activity may utilize pesticides that could create hazard issues with adjacent uses as well as soil and groundwater contamination. Overall impacts would be somewhat higher than those of the proposed project.

6.2.7 Hydrology/Water Resources

This alternative would involve less overall development than the proposed project and would leave about ~~45~~ 76-77 acres in their current agricultural / vacant condition. With respect to water quality, fewer pollutants associated with construction and urban development would be generated, but more sedimentation and agriculturally-related pollutants would remain. Overall, water quality impacts would be about the same as those of the proposed project.

Overall runoff volumes would be somewhat lower under this alternative since there would be less overall development and ~~45~~ 76-77 acres of vacant and agricultural lands would remain. Hydraulic impacts along the Santa Clara River would be about the same since runoff from developed areas would be controlled with onsite drainage systems and the levee system would be the same as that of the proposed project. The mitigation measures recommended for the proposed project would apply and would reduce impacts to a less than significant level.

Water demand would be lower under this alternative since overall development totals would be lower. As with the proposed project, available water supplies would be adequate to meet future demands and the mitigation recommended for the proposed project would apply.

6.2.8 Land Use and Planning

This alternative would involve no amendments to the Ventura General Plan. The Olivas Park Drive extension, levee, and associated water, wastewater, and recycled water infrastructure improvements would need to be constructed. This would require removal of the MCSD wastewater treatment facility and annexation of the MCSD property to the City. Future development within the project site would be in accordance with the 2005 General Plan land use designations. Lands designated for agricultural use, including those lands subject to the SOAR Ordinance, would retain their agricultural land use designations. This alternative would have no impact with respect to land use and planning, though the continued presence of agricultural activity in the area may pose certain compatibility conflicts with project site development, particularly the residential development that could be accommodated.

6.2.9 Traffic and Circulation

As shown in Table 6-2, this alternative would generate an estimated 13,273 daily vehicle trips compared to the 43,722 daily trips that would be generated by the proposed project. Table 6-3 shows intersection levels of service for Alternative 2. The City's traffic performance thresholds

Table 6-2
Estimated Trip Generation: Alternative 2 and Proposed Project

Land Use	Annual Daily Traffic	A.M. Peak Hour	P.M. Peak Hour
Current General Plan			
Retail Commercial	10,302	246	891
Office	550	78	74
Light Industrial	2,091	276	291
Residential	330	23	29
Total	**13,273**	**623**	**1,285**
Proposed Project			
Retail Commercial	43,199	1,031	3,736
Light Industrial	523	69	73
Total	**43,722**	**1,100**	**3,809**

Table 6-3
Alternative 2 (Existing General Plan Buildout Year)
Intersection Levels of Service

Intersection	A.M. Peak Hour		P.M. Peak Hour	
	ICU	LOS	ICU	LOS
1. Victoria Ave./U.S. Highway 101 NB Ramps	0.78	C	0.65	B
2. Valentine Rd./U.S. Highway 101 SB Ramps	0.48	A	0.52	A
3. Victoria Ave./Valentine Rd.	0.66	B	0.77	C
4. Victoria Ave./Olivas Park Dr.	0.66	B	0.83	D
5. Olivas Park Dr./Golf Course Rd.[(a)]	0.58	A	0.74	C
6. Perkin Rd./King Dr. [(a)]	0.18	A	0.22	A
7. Perkin Rd./Auto Center Dr. [(a)]	0.32	A	0.44	A
8. Johnson Dr./U.S. Highway 101 SB Ramps	0.63	B	0.96	E
9. North Bank Dr./Ventura Blvd.	0.41	A	0.87	D
10. Johnson Dr./North Bank Dr.	0.75	C	0.82	D

[(a)] *Analyzed as signalized intersections.*
Source: ATE, Olivas Park Drive Extension Project, City of Ventura, Traffic and Circulation Study. December 2012.

are LOS E (peak hour ICU less than or equal to 1.00) for freeway ramp intersections and LOS D (peak hour ICU less than or equal to 0.90) for all other principal intersections. As shown in Table 6-3, study area intersections would all operate within City of Ventura thresholds under Alternative 2. Therefore, compared to the proposed project, Alternative 2 would eliminate all of the proposed project's significant impacts, including the impact at the Johnson Drive / U.S. Highway 101 SB Ramps interchange. Consequently, impacts would be less than significant and mitigation would not be required.

6.2.10 Utilities/Service Systems

This alternative would reduce overall development potential within the project site to 650,000 square feet of non-residential development and 50 residences, or roughly half as much development as the proposed project. Consequently, it would reduce water demand and wastewater demand commensurately. Although the proposed project would not have significant impacts related to water or wastewater, this alternative's impact would be lower. Nevertheless, standard water conservation conditions would apply.

6.3 ALTERNATIVE 3: OLIVAS PARK DRIVE EXTENSION ONLY

This alternative would involve only the extension of Olivas Park Drive connecting the current terminus of Olivas Park Drive and Johnson Drive / Auto Center Drive. The proposed levee would not be constructed and none of the General Plan land use designation or zone changes would occur. Thus, other than the road extension, associated improvements, and closure of the MCSD wastewater treatment facility, the project site would remain in its current condition since flood conditions would continue to serve as an impediment to development of the area.

This alternative would meet the project objective related to improving circulation. However, it would not meet the objectives related to protecting future development from flooding, development of the project site with commercial and industrial uses, and allowing for commercial development that would provide local jobs and increase the City's sales tax base.

6.3.1 Aesthetics

Under this alternative, views of the project site would change minimally since only the road extension would be constructed. The site would remain primarily vacant, with some agricultural activity. As such, no blockage of views would occur and the project site would generally retain its current visual character. Lighting would be limited to street lights and would have no significant effect on overall light conditions in the area. Overall aesthetic impacts would be lower than those of the project and would be less than significant.

6.3.2 Agricultural Resources

This alternative would convert an estimated ~~7.6~~1.2 acres of Prime / Statewide Importance farmland to a road. This would be a significant impact, though the impact would be less than what would occur under the proposed project. Mitigation required for the proposed project would be apply, but the size of the required agricultural easement would be smaller. No change

in agricultural designations would occur; therefore, no findings would need to be made with respect to the SOAR Ordinance.

6.3.3 Air Quality

Temporary impacts to air quality resulting from construction of the Olivas Park Drive extension would be similar to those that would result from road construction under the proposed project. The same standard dust control mitigation would apply, and, as with the proposed project, the impact would be less than significant. Overall construction emissions would be lower than under the proposed project because of the lack of a levee and future project site development.

This alternative would not generate operational emissions since it includes no future development activity. No operational impact would occur and mitigation would not be required.

6.3.4 Biological Resources

This alternative would involve only construction of the Olivas Park Drive extension. As such, it would have no direct impact to the Santa Clara River or its associated riparian habitat. Impacts would be limited to those associated with roadway extension itself and would include disturbance to agricultural drainage ditches within the road alignment. Impacts would be potentially significant, but could be reduced to below a level of significance with the mitigation measures required for the proposed project.

6.3.5 Greenhouse Gases

Temporary GHG emissions resulting from construction of the Olivas Park Drive extension would be similar to those that would result from road construction under the proposed project. This alternative would not generate operational GHG emissions since it includes no future development activity. Impacts would be less than significant and mitigation would not be required.

6.3.6 Hazards/Hazardous Materials

This alternative includes the same road extension that would be part of the proposed project. Consequently, the potential hazardous material issues associated with this infrastructure improvement would be the same and the same mitigation program would apply to reduce impacts to below a level of significance. Because this alternative would not accommodate future project site development, there would be no further issues related to encountering soil or groundwater contamination. On the other hand, this alternative would be less likely to address any potential hazardous material issues that may be present on the properties that are to remain designated for agricultural use. In addition, any future agricultural activity may utilize pesticides that could create hazard issues with adjacent uses as well as soil and groundwater contamination. Overall impacts would be about the same as those of the proposed project.

6.3.7 Hydrology/Water Resources

This alternative would not include the proposed levee or any future development on the project site. Hydrologic and water quality impacts would be limited to those associated with the Olivas Park Drive extension. Compliance with applicable NPDES and associated local water quality regulations would reduce water quality impacts to a less than significant level and impacts related to increased runoff volumes and water demand would be minimal. Overall, impacts related to water resources would be lower than those of the proposed project and less than significant.

6.3.8 Land Use and Planning

This alternative would not require any General Plan amendments or zone changes, nor would it require any findings related to the City's SOAR Ordinance. However, without the levee component, this alternative would not facilitate development of the project site in accordance with the current General Plan land use designations for the site and it would not implement General Plan goals for economic development of the Auto Center area. Overall, this alternative's land use and planning impacts would be similar to those of the proposed project and would be less than significant.

6.3.9 Traffic and Circulation

This alternative would not facilitate any future development within the project site and, thus, would have no impact upon levels of service at study intersections. Completion of the Olivas Park Drive extension would provide benefits with respect to overall circulation in the area. This project would have no long-term impact with respect to traffic and circulation and impacts would be lower than those of the proposed project.

6.3.10 Utilities/Service Systems

This alternative would not facilitate any future development within the project site and, therefore, would have no long-term impact related to water or wastewater. Consequently, although the proposed project would not have significant impacts related to water or wastewater, this alternative's impact would be lower.

6.4 ALTERNATIVE 4: MINIMAL PRIME OR STATEWIDE IMPORTANCE FARMLAND CONVERSION

This alternative would avoid conversion of Prime and Statewide Importance Farmland to a non-agricultural use. Designated Prime and Statewide Importance farmlands within the project site are primarily limited to~~on parcels 9-11 and 14.~~ Parcel~~s~~ 10, which encompasses about 40 acres (about 36 of which are proposed to be designated Commerce). This parcel is ~~and 14 are~~ already designated Agriculture so this designation would remain in place ~~for these parcels~~. ~~Parcel 9 would be re-designated from Specific Plan to Agriculture, while Parcel 11 would be re-designated from Commerce to Agriculture. Combined, these parcels encompass about 60 acres, as shown in Table 6-4.~~

The Olivas Park Drive extension and levee would be built under this alternative and would encompass about ~~15~~ 8-9 acres of Prime / Statewide Importance farmland. Therefore, about ~~45~~ 22 acres of Prime / Statewide Importance farmland would remain.

Eliminating the development potential for ~~parcels 9-11 and 14~~Parcel 10 would eliminate the 75,000 square feet of industrial development associated with the proposed project and would reduce commercial development by about ~~750,000~~500,000 square feet. Thus, overall development potential for this alternative would be ~~about 508,000~~just over 700,000 square feet of commercial development.

This alternative would meet project objectives related to improving circulation and protecting future development from flooding. It would also partially meet objectives related to development of the project site with commercial and industrial uses and allowing for commercial development that would provide local jobs and increase the City's sales tax base, though to a lesser degree than the proposed project.

6.4.1 Aesthetics

Under this alternative, approximately ~~60~~ 36 acres of the ~~111.8~~139-acre project site would remain in their current condition. The portion of parcel 10 that is north of the Olivas Park Drive extension may continue to be farmed, but the remainder of the area is anticipated to remain as vacant land. This would reduce overall development intensity in the area, but may ultimately result in a more disjointed visual character where commercial and industrial development abut agricultural and vacant land. In addition, vacant lands may continue to suffer from lack of maintenance, thus detracting from the visual character of the area. As with the proposed project, this alternative would not adversely affect views of identified scenic resources or create significant light or glare impacts. Overall visual impacts associated with this alternative would be about the same as those of the proposed project and would be less than significant.

6.4.2 Agricultural Resources

This alternative would convert about ~~15~~ 8-9 acres of Prime / Statewide Importance Farmland to non-agricultural uses as compared to the ~~62~~ 30-31 acres that would be converted by the proposed project. Thus, this alternative would reduce, but not eliminate this unavoidably significant impact. Mitigation required for the proposed project would apply, but the size of the required agricultural easement would be smaller.

Only a fraction of the land converted by the proposed project is currently being farmed and at least one former agricultural operator in the area has indicated that the area is no longer viable for farming due to drainage and compatibility issues. In addition, compatibility issues with any remaining agricultural activity would become more acute as the remainder of the project site builds out with commercial uses. Nevertheless, this alternative would reduce agricultural resource impacts as compared to the proposed project.

6.4.3 Air Quality

Overall temporary impacts resulting from construction would be somewhat lower under this

alternative since about ~~45~~ 36 acres of the site that are proposed to be designated Commerce would not be developed. The same standard dust control mitigation would apply, and, as with the proposed project, the impact would be less than significant.

This alternative would accommodate about ~~62~~40% less future development than the proposed project. Therefore, operational emissions would be commensurately lower. Emissions would still exceed Ventura County APCD thresholds and the recommendations recommended for the proposed project would apply. Overall TDM fees would be lower, though the fees for each individual development within the project site would be roughly the same as for the proposed project.

6.4.4 Biological Resources

This alternative would incrementally reduce biological resource impacts since ~~about~~ an additional ~~60~~ 36 acres of the ~~111.8~~139-acre project site would likely remain in its current vacant condition (though it is possible that these lands could be farmed again in the future). The proposed Olivas Park Drive extension and levee would continue to be constructed and would have the same impacts relative to sensitive species and riparian habitats that would occur under the proposed project. Overall impacts would significant, but mitigable, but would be slightly lower than those of the proposed project. Mitigation measures recommended for the proposed project would apply.

6.4.5 Greenhouse Gases

Overall project site development would be about ~~62~~40% lower under this alternative than under the proposed project. As such, overall construction-related and operational GHG emissions would be commensurately lower. As with the proposed project, impacts would be significant, but mitigable. Mitigation recommended for the proposed project would apply, though the overall reduction in emissions needed to reduce emissions below threshold levels would be lower.

6.4.6 Hazards/Hazardous Materials

This alternative includes the same road extension and levee that would be part of the proposed project. Consequently, the potential hazardous material issues associated with these infrastructure improvements would be the same and the same mitigation program would apply to reduce impacts to below a level of significance. Because about ~~60~~ 36 additional acres of the project site would not be developed under this alternative, the potential for future development to encounter hazardous material issues would be lower. On the other hand, this alternative would be less likely to address any potential hazardous material issues that may be present on the properties that are to remain designated for agricultural use. In addition, any future agricultural activity may utilize pesticides that could create hazard issues with adjacent uses as well as soil and groundwater contamination. Overall impacts would be somewhat higher than those of the proposed project.

6.4.7 Hydrology/Water Resources

Similar to Alternative 2, this alternative would involve less overall development than the proposed project and would leave about ~~45~~ 36 additional acres in their current agricultural / vacant condition. With respect to water quality, somewhat fewer pollutants associated with construction and urban development would be generated, but more sedimentation and agriculturally-related pollutants would remain. Overall, water quality impacts would be about the same as those of the proposed project.

Overall runoff volumes and water demand would be lower under this alternative since there would be less overall development and ~~45~~ 36 additional acres of vacant and agricultural lands would remain. Hydraulic impacts along the Santa Clara River would be about the same as those of the proposed project and water demand would be lower since overall development totals would be lower. Mitigation measures recommended for the proposed project would apply and would reduce water resource impacts to a less than significant level.

6.4.8 Land Use and Planning

This alternative would leave about ~~60~~ 36 additional acres of the ~~111.8~~139-acre project site in its current agricultural / vacant condition. This would not achieve the City's economic objectives for this portion of the site, as outlined in the Ventura General Plan and the project objectives. On the other hand, leaving these lands in their current condition may better achieve certain General Plan objectives related to preservation of agricultural land and open space. This alternative would not require the City Council to make the necessary findings to allow for re-designation of ~~the properties~~Parcel 10 (which is subject to the SOAR Ordinance) to a non-agricultural use. Neither this alternative nor the proposed project would create any apparent conflicts with Ventura County LAFCo policies related to the boundary adjustments needed for the MCSD property. Overall land use impacts would be about the same as those of the proposed project and would be less than significant.

6.4.9 Traffic and Circulation

The ~~508~~roughly 700,000 square feet of commercial development that could be developed under this alternative would generate ~~an estimated 17,444 daily vehicle trips or~~ about ~~6~~40% fewer trips than would be generated by the proposed project. Consequently, this alternative would reduce traffic impacts at all study locations. However, although the impact at the Johnson Drive / U.S. Highway 101 SB Ramps intersection would be reduced, the level of service at the intersection would likely still exceed City standards. As such, the mitigation measures recommended for the proposed project would apply. ~~I~~As with the proposed project, implementation of the proposed mitigation measures would reduce the impact to below a level of significance~~; however, similar to the proposed project, the impact would remain significant if it is determined that the mitigation measures are infeasible or undesirable~~.

6.4.10 Utilities/Service Systems

This alternative would reduce overall development potential within the project site to just over ~~508~~700,000 square feet of commercial development, which ~~is less than half of~~about 40% less

than ~~what~~ the proposed project would facilitate. Therefore, this alternative would reduce water demand and wastewater demand commensurately. Although the proposed project would not have significant impacts related to water or wastewater, this alternative's impact would be lower. Nevertheless, standard water conservation conditions would apply.

6.5 ALTERNATIVES CONSIDERED, BUT REJECTED

Various alternative alignments and designs for the proposed Olivas Park Drive extension and levee were contemplated as the proposed project was designed. However, the road alignment and levee design considered in this EIR was determined to best meet City roadway standards, while minimizing impacts to the adjacent Santa Clara River. No other alignments that would connect the current terminus of Olivas Park Drive to Johnson Drive / Auto Center Drive would eliminate or substantially reduce the proposed project's significant and unavoidable impacts related to agricultural land conversion and transportation / traffic. Therefore, consideration of alternative road alignments and / or levee designs is not warranted.

6.6 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?*

Improving circulation in the project site vicinity by providing a link between Johnson Drive and the current terminus of Olivas Park Drive and protecting existing and future development in the area from flooding along the Santa Clara River are among the key objectives of the project. Therefore, consideration of an alternative site for these infrastructure improvements is not feasible. Other sites within Ventura could physically accommodate the future commercial and industrial development that would be facilitated by the proposed General Plan amendments and zone changes. However, another key objective is to allow for the logical development of the project site vicinity with commercial and industrial uses compatible with those within and around the Ventura Auto Center Therefore, re-designating another area of Ventura to accommodate project site development would not meet this objective. Because meeting most of

the project objectives are specifically dependent upon constructing the proposed improvements and facilitating commercial and industrial development on the project site, analysis of alternative sites is not warranted.

6.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-4~~5~~ compares the environmental effects of each alternative in the issue areas that were covered in the EIR. The No Project Alternative would avoid all of the proposed project's adverse environmental impacts. However, it would not remediate existing soil and groundwater contamination and would not eliminate the potential for future development proposals within the project site. Moreover, it would not meet any of the project objectives.

All of the other alternatives would reduce one or more of the proposed project's environmental impacts. Both the Existing General Plan Alternative and Minimal Prime or Statewide Importance Farmland conversion alternatives would have reduced impacts as compared to the proposed project in most issue areas due to the overall reduction in development potential. Both of these alternatives would also substantially reduce, but not eliminate, the proposed project's unavoidably significant impact related to conversion of Prime and Statewide Importance farmland to non-agricultural uses. However, these alternatives would not meet objectives related to development of the project site with commercial and industrial uses and allowing for commercial development that would provide local jobs and increase the City's sales tax base to the same degree that the proposed project would.

Table 6-4~~5~~
Comparison of Environmental Impacts of Alternatives

Issue	Proposed Project	No Project No Build	Existing General Plan	Olivas Park Drive Ext. Only	Minimal Prime/ Statewide Importance Farmland
Aesthetics	=	=	=	+	=
Agricultural Resources		+	+	+	+
Air Quality	=	+	+	+	+
Biological Resources	=	+	=	+	+
Greenhouse Gases	=	+	+	+	+
Hazards/Hazardous Materials	=	=	=	=	+
Hydrology/Water Quality	=	+	+	+	+
Land Use and Planning	=	+	=	=	=
Transportation/Traffic	=	+	+	+	+
Utilities/Service Systems	=	+	+	+	+

+ Superior to the proposed project
- Inferior to the proposed project
= Similar impact to the proposed project

The Olivas Park Drive Extension Only alternative would reduce impacts in most issue areas and would substantially reduce, but not eliminate, the proposed project's unavoidably significant impact related to conversion of Prime and Statewide Importance Farmland to non-agricultural uses. The City would not need to make findings with respect to the SOAR Ordinance under this alternative and no changes to the hydrology of the Santa Clara River would occur since there would be no levee. On the other hand, onsite flooding issues would remain and would serve as an impediment to future development on the project site. As such, this alternative would not meet several key project objectives.

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7.1.2 Persons Contacted

Chandra Chandrashaker, City of Ventura Community Development Department
Tom Mericle, City of Ventura Public Works Department
Lucho Rodriguez, City of Ventura Public Works Department
John Willis, City of Ventura, Ventura Water

7.2 REPORT PREPARERS

This EIR was prepared by the City of Ventura with the assistance of Rincon Consultants, Inc., Associated Transportation Engineers, and Hawks and Associates. Consultant staff involved in the preparation of the EIR are listed below.

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8.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

This section includes the comment letters on the Draft EIR for the Olivas Park Drive Extension Project and the City of Ventura's responses to the comments. The City received 11 comment letters on the Draft EIR. Commenters and the page on which each comment letter can be found are listed below.

The response to each comment letter immediately follows the individual letter. Where a letter includes more than one comment, the comments have been addressed individually and are numbered sequentially (e.g., 1.1, 1.2).

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

September 24, 2013

Chandra Chandrashaker
City of Ventura
501 Poli Street, P.O. Box 99
Ventura, CA 93002-0099

Subject: Olivas Park Drive Extension
SCH#: 1995081004

Dear Chandra Chandrashaker:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 23, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 1995081004
Project Title Olivas Park Drive Extension
Lead Agency Ventura, City of

Type EIR Draft EIR

Description The proposed project would involve: (1) the extension of Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive; (2) a levee/floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River and terminates 350 feet south of the Southern Pacific Railroad; (3) General Plan amendments for land use changes for parcels within the 111.8-acre project boundary and reclassification of the Olivas Park Drive roadway extension; (4) a Specific Plan amendment to revise the boundaries of the Auto Center Specific Plan; and (5) zone changes for parcels within the project boundaries.

Lead Agency Contact

Name Chandra Chandrashaker
Agency City of Ventura
Phone 805 654 7714 **Fax**
email
Address 501 Poli Street, P.O. Box 99
City Ventura **State** CA **Zip** 93002-0099

Project Location

County Ventura
City Ventura
Region
Lat / Long 34° 14' N / 119° 11' W
Cross Streets Between Golf Course Drive and Johnson Drive
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 101
Airports
Railways UPRR
Waterways Santa Clara River
Schools
Land Use Z: R-1-1AC, CPD, M-P-D, M-1, M-2
GPLUD: Agriculture, Commerce, Specific Plan, Industry

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 08/08/2013 **Start of Review** 08/08/2013 **End of Review** 09/23/2013

Letter 1

Commenter: Scott Morgan, Director, State Clearinghouse

Date: September 24, 2013

The commenter indicates that no state agencies submitted comments on the project and that the City has complied with State Clearinghouse review requirements. No response is necessary.

STATE OF CALIFORNIA Edmund G. Brown, Jr., *Govemor*

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

September 3, 3013

Ms. Chandra Chandrashaker
City of Ventura Public Works Department
501 Poli Street
Ventura, CA 93002

RE: SCH#1995081004 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Olivas Park Drive Extension Project EIR;"** located in the City of Ventura; Ventura County, California

Dear Ms. Chandrashaker:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project eresource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. This area is known to the NAHC to be very culturally sensitive. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American

human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Native American Contacts
Ventura County
September 3, 2013

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com
Chumash
Tataviam
Ferrnandeño

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell
Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517
Santa Ynez , CA 93460
varmenta@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax
Chumash

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach CA 93433
(805) 481-2461
(805) 474-4729 - Fax
Chumash

Fernandeno Tataviam Band of Mission Indians
Larry Ortega, Chairperson
1019 - 2nd Street, Suite #1
San Fernando CA 91340
(818) 837-0794 Office

(818) 837-0796 Fax
Fernandeno
Tataviam

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL
Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennslie, Chair
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jtumamait@sbcglobal.net
(805) 646-6214
Chumash

Stephen William Miller
189 Cartagena
Camarillo , CA 93010
(805) 484-2439
Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1995081004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Olivas Park Drive Extension Project EIR; located in the City of Ventura; Ventura County, California.

Native American Contacts
Ventura County
September 3, 2013

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365 Chumash
Santa Ynez , CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX

Santa Ynez Band of Mission Indians
Tribal Admin/Counsel Sam Cohen
P.O. Box 517 Chumash
Santa Ynez , CA 93460
info@santaynezchumash.org
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(805) 686-9578 Fax

Randy Guzman - Folkes
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Moorpark , CA 93021 Fernandeño
ndnRandy@yahoo.com Tataviam
(805) 905-1675 - cell Shoshone Paiute
Yaqui

Carol A. Pulido
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Oak View , CA 93022
805-649-2743 (Home)

Coastal Band of the Chumash Nation
Michael Cordero, Chairperson
P.O. Box 4464 Chumash
Santa Barbara CA 93140
CbcnTRIBALCHAIR@gmail.com

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Charles S. Parra
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(805) 488-0481 (Home)

Frank Arredondo
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ksen_sku_mu@yahoo.com

This list is current only as of the date of this document.

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Native American Contacts
Ventura County
September 3, 2013

Santa Ynez Tribal Elders Council
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805-688-7997, Ext 37
freddyromero1959@yahoo.com

Coastal Band of the Chumash Nation
Crystal Baker
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805-466-8406

Barbareno/Ventureno Band of Mission Indians
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Rancho Pales Verdes CA 90275
310-831-5295

Coastal Band of the Chumash Nation
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Carpinteria , CA 93013
805-684-8281

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
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805-987-5314

Coastal Band of the Chumash Nation
Janet Darlene Garcia
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Santa Barbara CA 93140
805-689-9528

This list is current only as of the date of this document.

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Letter 2

Commenter: Dave Singleton, Program Analyst, California Native American Heritage Commission

Date: September 3, 2013

The commenter describes requirements for cultural resource studies pursuant to CEQA, provides a list of Native American groups to consult, and indicates general mitigation requirements. As discussed in the Initial Study contained in DEIR Appendix A:

> *A Phase I archaeological study involving field reconnaissance, and a record search was conducted by W and S Consultants in 1995. The Phase I archaeological study and record search did not identify any evidence of archaeological resources (W and S Consultants, 1995). No known archaeological resources or human remains are present on the project site. The likelihood that such resources are present is low since the area has been highly disturbed by past agricultural activity and urban uses and has already been surveyed for archaeological resources with negative results. In the event that archaeological resources are unearthed during project construction, it is standard City practice to temporarily suspend work until an archaeologist has evaluated the nature and significance of the find pursuant to General Plan Action 9.15. If resources are encountered, General Plan Action 9.15 requires the developer to hire an archaeologist to oversee the handling of archaeological materials with coordination with the Ventura County Archaeological Society and local Native American organizations as appropriate.*

Based on the above, it has been determined that there is no evidence of on-site cultural and that, in the unlikely event that any cultural resources are detected during grading and development, compliance with City General Plan actions will ensure the proper evaluation and treatment of such resources. In addition, the City has initiated the required SB 18 Native American consultations in response to the proposed General Plan amendments. As part of that process, area Native American representatives have been contacted. The SB 18 consultations are for oriented toward preserving or mitigating impacts to Native American historic, cultural, sacred sites, features, and objects. Any agreements with local Native American groups made pursuant to these consultations will become conditions of project approval.

Chandra,

The bio mitigation measures are well developed please implement them per the MND. Please contact me if you or your consulting biologists need to consult on species observed during surveys (burrowing owls, listed species, or nesting birds issues as well as woodrat issues). And please contact Jeff Humble (Jeff.Humble@wildlife.ca.gov) if you have any questions re: notification of the Department for a Streambed Alteration Agreement.

Thanks, Dan

Daniel S. Blankenship
Senior Environmental Scientist (Specialist)
Wildlife and Range Mangement Major Emphasis HSU
Habitat Conservation Planning - North
CA Department of Fish and Wildlife
South Coast Region
P.O. Box 802619
Santa Clarita, CA 91380-2619
O 661-259-3750
C 661-644-8469
Daniel.Blankenship@wildlife.ca.gov

Letter 3

Commenter: Daniel Blankenship, Senior Environmental Scientist, California Department of Fish and Wildlife

Date: August 21, 2013

The commenter indicates that the biological resource mitigation measures are well developed and invites the City to contact the CDFW with any questions. The City will contact CDFW staff with any future questions and regarding any Streambed Alteration Agreement that may be required.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0360
TTY (213) 897-4937

Flex your power!
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September 23, 2013

Ms. Chandra Shaker
City of Ventura
501 Poli Street
Ventura, CA. 93002-0099

RE: IGR/CEQA No. 130103/NY
DEIR Olivas Park Dr. extension
SCH#1995081004
Vicinity: VEN/101/24.65

Dear Ms. Shaker:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Olivas Park Dr. extension in the City of Ventura.

Caltrans has reviewed the Traffic Impact Study (TIS) prepared for this project and have the following comments:

1. Please have the project traffic consultant prepare a queue analysis for the two (2) impacted South-bound ramps at Johnson Interchange and Victoria Avenue to determine whether the queue would be adequately accommodated within the off-ramps.

2. Ramp and Intersection improvements may be necessary to avoid queues backing into the mainline freeway lanes, thus creating a potential safety hazard.

If you have any questions regarding this response, please call Mr. Nerses Armand Yerjanian, the Project Coordinator, at (213) 897-6536 and refer to IGR/CEQA # 130103/NY.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter 4

Commenter: Dianna Watson, IGR/CEQA Branch Chief, California Department of Transportation, District 7

Date: September 23, 2013

The commenter requests a queue analysis of the Johnson Drive and Victoria Avenue interchanges and suggests that intersection improvements may be necessary to avoid queues backing on to the mainline freeway. In response to this request, Caltrans District 7 staff was contacted and it was determined that analysis of the U.S. Highway 101/Victoria Avenue interchange was not warranted since no significant project impact was identified at that location. A queue analysis of the Highway 101/Johnson Drive interchange was, however, conducted. As indicated in the attached letter, the maximum vehicle queue at that interchange is projected to be 290 feet, while the offramp provides 900 feet of storage. Thus, vehicles are not expected to back up onto the freeway mainline.

DEPARTMENT OF CONSERVATION

Managing California's Working Lands

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • **FAX** 916 / 327-3430 • **TDD** 916 / 324-2555 • **WEBSITE** conservation.ca.gov

September 24, 2013

Chandra Chandrashaker
City of Ventura Public Works Department
501 Poli Street
Ventura, CA 93002

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE OLIVAS PARK DRIVE EXTENSION PROJECT – SCH # 1995081004 – VENTURA COUNTY

Dear Chandra Chandrashaker:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) for the Olivas Park Drive Extension project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The Olivas Park Drive Extension project consists of 111.8 total acres and is in and adjacent to the City of Ventura, in Ventura County. The proposed project would allow for the future commercial development of the project site as well as extending Olivas Park Drive as a four-lane Secondary Arterial between Golf Course Drive and Auto Center Drive and constructing a levee/floodwall that is approximately 5,400 linear feet in length along the north side of the Santa Clara River.

The project site includes the existing General Plan land use designations of Agriculture, Commerce, Specific Plan, and Industry. Portions of the project site have been historically cultivated, and one remaining parcel is in active cultivation. Implementation of the proposed project would convert this farmland to urban uses and would preclude future agricultural uses on the site.

Division Comments

Per the 2010 Important Farmland Map for Ventura County, produced by the Farmland Mapping and Monitoring Program (FMMP), the project area has approximately 29 acres designated as Prime Farmland and 1 to 2 acres designated as Farmland of Statewide Importance. The Division recommends that the final EIR incorporates the 2010 designations. The most recent Important Farmland maps can be found at: http://maps.conservation.ca.gov/ciff/ciff.html. Even though the amount of Prime Farmland is less than indicated in the DEIR, the conversion of 30

acres of Prime Farmland is still a material consideration for the California Environmental Quality Act (CEQA).

Impacts on Agricultural Land

Land use conversion statistics from the Important Farmland Data Availability webpage[1] documents a net loss of approximately 9,020 acres of irrigated Important Farmland in Ventura County from 2000 to 2008, with an annual average loss of 1,127 acres per year. This cumulative loss represents a significant impact to the agricultural resources of the County and the State, and shows why the remaining prime agricultural resources should be protected whenever feasible.

Mitigation Measures

Although direct conversion of agricultural land may be an unavoidable impact under CEQA analysis, mitigation measures, including compensatory mitigation, must be considered and adopted if feasible. The lead agency asserts that:

> *Outside of retaining the current Agriculture designations on the project site and now allowing development of Prime and Statewide Importance Farmland with non-agricultural uses, no mitigation is available to reduce this impact to a less than significant level.*[2]

Local agencies have implied that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project. However, reduction to a level below significance is not a criterion for mitigation. Rather, the criterion is feasible mitigation that lessens a project's impacts. Pursuant to CEQA Guideline § 15370, mitigation includes measures that avoid, minimize, rectify, reduce or eliminate, or compensate for the impact. In addition, the 6th District Court of Appeals found in *Save Panoche Valley v. County of San Benito* (43 ELR 20143. No. H037599, (Cal. Ct. App. 6th Dist., 06/25/2013)) that:

> *Save Panoche Valley's insistence that the mitigation measures fail because there is no creation of additional agricultural lands to compensate for the ones utilized for the project site are unsubstantiated. We are unaware of any case law that supports Save Panoche Valley's position. The goal of mitigation measures is not to net out the impact of a proposed project, but to reduce the impact to insignificant levels. (See Banning Ranch Conservancy, supra, 211 Cal.App.4th at p. 1233.)*

Therefore, an analysis of all potentially feasible mitigation measures which could lessen a project's impacts should be included in the final EIR for the Olivas Park Drive Extension project. A measure brought to the attention of the lead agency should not be left out unless it is

[1] http://redirect.conservation.ca.gov/dlrp/fmmp/product_page.asp
[2] Section 4.2 Agricultural Resources. City of Ventura Olivas Park Extension Drive Project EIR, Volume 1 : Report. August 2013. Page 4.2-10.

infeasible based on its elements. The DEIR does not provide any information showing that the lead agency has contemplated compensatory mitigation as a possible action to reduce the impact's level to less than significant.

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Division recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as compensation for the direct loss of agricultural land. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline § 15370. The Division highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands need not be limited strictly to lands within the project's surrounding area, but should be roughly equivalent in proximity, acreage, and agricultural characteristics to the affected property.

The establishment of an easement in Ventura County is potentially feasible. If the City were not able to make arrangements for easement mitigation through one of the land trusts operating in southern California, the Division could be available for assistance. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Thank you for giving us the opportunity to comment on the DEIR for the City of Ventura's Olivas Park Drive Extension project. Please provide this Department with the date of any hearings for this particular action, and any staff reports pertaining to it. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Heather Anderson, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814, or by phone at (916) 324-0869.

Sincerely,

Molly A. Penberth, Manager
Division of Land Resource Protection
Conservation Program Support Unit

cc: State Clearinghouse

Letter 5

Commenter: Molly A. Penberth, Manager, Division of Land Resource Protection, California Department of Conservation

Date: September 24, 2013

Response 5.1

The commenter suggests that the acreage of Prime and Statewide Importance Farmland affected by the proposed project is slightly lower than suggested in the DEIR, but states that the conversion of farmland remains a consideration under CEQA. The DEIR indicates that approximately 43.36 acres of Prime Farmland and 18.32 acres of Farmland of Statewide Importance are located within the project site, whereas the commenter suggests that the totals are 29 acres of Prime Farmland and 1-2 acres of Farmland of Statewide Importance.

The online map referenced by the commenter was used to update DEIR Figure 4.2-1 (see attached map). As the commenter notes, some of the lands identified in the DEIR as being Prime or Statewide Importance farmlands no longer carry those designation. Therefore, the acreage of such lands converted by the proposed project would be lower than was reported in the DEIR. The text of DEIR Section 4.2, *Agricultural Resources*, has been updated to reflect these revised totals. Nevertheless, as the commenter suggests, the impact related to agricultural land conversion would remain significant and unavoidable.

Response 5.2

The commenter notes annual losses of farmland in Ventura County and indicates that these losses show why remaining prime agricultural resources should be protected whenever feasible. The DEIR identifies the conversion of project site farmlands as an unavoidably significant impact of the proposed project. If the project is approved, the City will need to adopt a Statement of Overriding Considerations indicating the reasons that the project's benefits outweigh this significant environmental impact. In addition, the City of Ventura has undertaken a variety of policies and programs specifically intended to preserve farmland in and around the City wherever feasible. In addition, a mitigation measure has been added to further reduce agricultural impacts. Please see Response 5.3 for further discussion.

Response 5.3

The commenter suggests that compensatory mitigation for loss of farmland should be considered and states that an analysis of all potentially feasible mitigation measures should be included in the FEIR. The commenter specifically mentions permanent agricultural conservation easements that could be implemented by either the purchase of easements or donation of mitigation fees to a local, regional, or statewide organization whose purpose includes the acquisition and stewardship of agricultural conservation easements.

As noted above, the City of Ventura participates in a number of citywide and regional programs aimed at agricultural land conservation. As described in the Regulatory Setting of DEIR Section 4.2, *Agricultural Resources*, these are summarized below.

Save Our Agricultural Resources (SOAR) Ordinance. This ordinance, approved by the voters in 1995, which requires voter approval for the re-designation of lands designated Agriculture.

Greenbelt Agreements. These are joint or co-adopted resolutions by cities, the County (when applicable) and the Ventura County LAFCO, whereby it is agreed to cooperatively administer a policy of non-annexation and non-development in a specific area. The City of Ventura is a participant in two greenbelt agreements, one with the City of Santa Paula that was adopted in 1967 and one with the City of Oxnard in 1994 and updated in 2002.

Right-To-Farm Ordinances. In 1997, the City of Ventura adopted a Right-To-Farm Ordinance to provide protection to farmers against nuisance claims and frivolous lawsuits involving legal and accepted farming practices. The measure requires realtors to disclose potential conflicts with agriculture (e.g., pesticide odors, noise from machinery, pesticides use) when properties adjacent to agricultural parcels are for sale. The ordinance also provides a statement that agriculture is not subject to nuisance claims if it is being properly conducted. Ventura County also has a Right-To-Farm Ordinance that mediates similar disputes between neighboring cities.

2005 General Plan Goals and Policies. The 2005 General Plan contains several goals and policies that address agriculture resources, including:

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

Policy 3D: Continue to preserve agricultural and other open space lands within the City's Planning Area.

Action 3.17 Continue to support the Guidelines for Orderly Development as a means of implementing the General Plan, and encourage adherence to these Guidelines by all the cities, the County of Ventura, and the Local Agency Formation Commission (LAFCO); and work with other nearby cities and agencies to avoid urban sprawl and preserve the rural character in areas outside the urban edge.

Action 3.20 Pursuant to SOAR, adopt development code provisions to "preserve agricultural and open space lands as a desirable means of shaping the City's internal and external form and size, and of serving the needs of the residents.

Action 3.21: Adopt performance standards for non-farm activities in agricultural areas that protect and support farm operations, including requiring non-farm uses to provide all appropriate buffers as determined by the Agriculture Commissioner's Office.

The project site is not directly subject to either the SOAR Ordinance or either of the greenbelt agreements described above. Nevertheless, based on these existing programs, the City has already identified agricultural lands both within and adjacent to the City limits for long-term conservation and provided specific mechanisms (requirement for voter approval, greenbelt agreements) to ensure that these identified lands remain in agricultural use. Consequently, establishment of additional agricultural conservation easements is not warranted and would conflict with the City's objectives of facilitating development of the project site with commercial and industrial uses. In response to this comment, the following mitigation measure has been added to the FEIR:

AG-1 *Agricultural Conservation Easement. Mitigation shall be provided for the loss of state-designated Prime Farmland and Farmland of Statewide Importance in existence at the time property in the project area containing such state-designated Farmland is developed. Applicants seeking to develop such state-designated Farmland shall cause to be set aside in perpetuity agricultural lands of equivalent acreage (a 1:1 ratio) and with soil and farming conditions equivalent or superior to the state-designated Farmland that the applicant seeks to convert to other uses. The applicant shall either purchase one or more permanent, irreversible agricultural easements for the benefit of the City or other qualifying entity acceptable to the City, or contribute funds to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements, to be earmarked for the purchase of permanent, irreversible agricultural easements. The protected acreage equal to the total acreage of, and of equivalent soil and farming conditions to, the state-designated Farmland to be converted shall be set aside prior to the commencement of any development activity.*

This measure would reduce agricultural resource impacts to the degree feasible. However, outside of eliminating all conversion of all Prime and Statewide Importance farmland to non-agricultural uses, impacts would remain significant and unavoidable.

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division
Kimberly L. Prillhart
Director

September 23, 2013

City of Ventura
Planning Division
Attn.: Chandra Chandrashaker
501 Poli St.
Ventura, CA 93002

E-mail: cchandrashaker@ci.ventura.ca.us

Subject: Comments on the DEIR for the Olivas Park Drive Extension Project

Dear Ms. Chandrashaker:

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 Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

Tricia Maier, Manager
Planning Programs Section

Attachments

County RMA Reference Number 10-043-2

Letter 6

Commenter: Tricia Maier, Manager, Planning Programs Section, County of Ventura Resource Management Agency

Date: September 23, 2013

The commenter indicates that comments from the County of Ventura are attached and indicates where to send responses to the comments. Specific County comments are addressed in the responses to letters 7-9. Responses will be sent directly to the commenters with a copy to Laura Hocking.

PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division

MEMORANDUM

DATE: August 21, 2013

TO: RMA – Planning Division
Attention: Laura Hocking

FROM: Transportation Department

SUBJECT: **REVIEW OF DOCUMENT 10-043-2** Draft Environmental Impact Report (DEIR) for the Olivas Park Drive Extension Project.
Road construction/extension, levee/floodway construction, General Plan amendment, and Zone Change.
Olivas Park Drive from Perkin Avenue to Johnson Drive/Auto Center Drive, Ventura (city).
Lead Agency: City of Ventura

Pursuant to your request, the Public Works Agency – Transportation Department has reviewed the DEIR for the Olivas Park Drive Extension Project.

The project affects approximately 112 acres south of the Ventura Auto Center and includes the: (1) construction/extension of Olivas Park Drive as a 4-lane secondary arterial from Golf Course Drive to Johnson Drive and the southbound US 101 on/off ramps in the City of Ventura; (2) construction of levee/floodwall along the Santa Clara River south of the new roadway; (3) General Plan Amendments; (4) Zone Changes; (5) a Specific Plan Amendment; and (6) annexation of the Montalvo Community Services District parcel. The County of Ventura Montalvo Waste Water Treatment facility has or will be abandoned.

The proposed General Plan Amendments and Zone Changes will allow for the development of approximately 1,258,000 SF of retail commercial space and 75,000 SF of light industrial space in the project area with an associated trip generation of 43,722 average daily trips (ADT), 1,100 morning peak-hour trips (AM PHT), and 3,809 afternoon/evening peak-hour trips (PM PHT). The current General Plan allows for development of approximately 300,000 SF of retail commercial space, 50,000 SF of office space, 300,000 SF of light industrial space, and 50 residential units with an associated trip generation of 13,273 ADT, 623 AM PHT, and 1,285 PM PHT.

According to the DEIR, the potential traffic impacts associated with the proposed development will cause two intersections in the city to operate at unsatisfactory levels of service. Mitigation Measure (MM) 7-1(a) on Page 4.9-15 of the DEIR proposes dual left-turn lanes on the westbound approach of the intersection of Victoria Avenue and Olivas Park Drive.

Due to the unique geometry associated with the intersection of Johnson Drive at the US 101 on and off ramps, the DEIR proposes three (3) mitigation measures. MM 7-1(b) requires annual monitoring of the capacity of the intersection and proposes MM 7-1(c) or MM 7-1(d) when the threshold Intersection Capacity Utilization (ICU) reaches 0.95. MM 7-1(c) would eliminate the northbound left

turn on Johnson Drive to the southbound US 101 on ramp. Two northbound lanes would be provided from Auto Center Drive to North Bank Drive. As part of MM 7-1(c), an exclusive right-turn lane in the northbound direction would be provided at Victoria Avenue and Valentine Road. The alternative MM 7-1(d) would restrict northbound left turns at Johnson Drive to the southbound US 101 on ramp during the evening peak hours only (4 p.m. to 6 p.m.). The exclusive right-turn lane at Victoria Avenue and Valentine Road would still be required.

We offer the following comments:

1. Our previous comments dated January 7, 2011 and January 9, 2013, are still valid and applicable.

2. It is our understanding that the annexation of the Montalvo Community Services District parcel would prevent any creation of a County "island" caused by the construction of the roadway and levee through the parcel.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

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Letter 7

Commenter: Transportation Department, County of Ventura Public Works Agency

Date: August 21, 2013

Response 7.1

The commenter summarizes the project, identified significant traffic impacts, and mitigation measures. No response is necessary.

Response 7.2

The commenter states that previous responses to the Notice of Preparation are still applicable. The previous NOP responses have been addressed as appropriate in the DEIR. As noted under "Cumulative Impacts" in DEIR Section 4.9, *Traffic and Circulation*, project site developers will be required to pay the applicable County Traffic Impact Mitigation Fee (TIMF) in accordance with the City's reciprocal fee agreement with the County.

Response 7.3

The commenter indicates that annexation of the Montalvo Community Services District parcel would prevent the creation of a County "island." This is correct. The annexation would not create a County island.

Ventura County
Watershed Protection District
Water & Environmental Resources Division

MEMORANDUM

DATE: September 19, 2013

TO: Laura Hocking, Case Planner
Resource Management Agency, Planning Division

FROM: Pam Lindsey, Watershed Ecologist

SUBJECT: **RMA 10-043-2, OLIVAS PARK DRIVE EXTENSION DRAFT ENVIRONMENTAL IMPACT REPORT, AUGUST 2013, CITY OF SAN BUENAVENTURA EIR-11-10-4397**

The Environmental Services Section of the Ventura County Watershed Protection District (District) has reviewed the City of Ventura's Draft Environmental Impact Report (DEIR) for the proposed Olivas Park Drive Extension, as requested in the City's Notice of Availability dated August 2013. Comments are listed in tabular format below. If you have any questions, you may reach Angela Bonfiglio Allen, Environmental Planner, at 805-477-7175 or Angela.Bonfiglio@ventura.org.

Page	Comment
ES-2, 2-14	In "Discretionary Approvals Required from Other Agencies" (p ES-2) and "approvals needed from other agencies" (p 2-14) add: 1. Section 401 Certification, Los Angeles Regional Water Quality Control Board 2. State and Federal Endangered Species Act Compliance, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and National Marine Fisheries Service Note, reference to California Department of Fish and Game (CDFG) is made throughout the document and needs to be updated due to the name change in January 2013.
ES-22	Table ES-1, Impact T-1, Significance after Mitigation refers to feasibility or desirability of measures T-2 and T-3, which do not appear to be relevant. Perhaps the references should be to measures T-1(c) and T-1(d).
ES-22	Table ES-1, Impact T-1, Measure T-1(d). This measure would encourage U-turns at the Motel 6 driveway area on Johnson Drive during PM peak traffic. This location does not have a signal, and none

	is proposed in the measure. This measure would create a traffic hazard in a new location.
1-3, 1-4	Discussion of responsible and trustee agencies should also include the Los Angeles Regional Water Quality Control Board, U.S. Fish and Wildlife Service, and National Marine Fisheries Service.
2-7	Section 2.4.2 Santa Clara River Levee description states "levee bank and toe protection adjacent to the Santa Clara River would primarily consist of rock riprap and vegetated slopes..." Note that US Army Corps of Engineers standards require that levee structures and adjacent 15-foot-wide buffer be maintained clear of vegetation (with the exception of grasses), thus conflicting with the project description. Aesthetic impact analysis should take this restriction into consideration.
2-7	Section 2.4.2, the description of the proposed levee facilities is unclear, and the subsection lengths (floodwall, rock riprap, vegetated slope, etc.) do not add up to the proposed 5,400-foot total length. Also, the text states that it would terminate "with a floodway (450 linear feet) along the north side of the roadway extension." What exactly does this mean in terms of proposed structures? The text also states that for "the floodwall portion of the facility, the proposed roadway extension would be elevated and cross over the top of the levee and descend to connect with Johnson Drive," but Figure 2-2a shows no intersection of the proposed road and levee. It would be helpful to visually delineate locations of the various subtypes of proposed improvements on a figure.
2-7	Text states the "City of Oxnard is also contemplating construction of a levee on the south side of the Santa Clara River. This levee would be approximately 2.1 miles in length and would extend southwest from the U.S. Highway 101 overpass to near the South Victoria Avenue overpass." A levee already exists for the downstream 1.6 miles of this stretch of river, but must be improved to meet FEMA certification requirements. A new levee must be constructed only from the U.S. Highway 101 overpass southwestward about 0.5 mile. Please clarify this in the EIR.
4.1-11	A cumulatively considerable aesthetic impact is identified, but no mitigation is proposed. What is the rationale for this omission?
4.4-1	All biological surveys were conducted when endangered least Bell's vireo and southwestern willow flycatcher would not be present. The Ventura County Watershed Protection District conducted protocol surveys for both of these species along the south bank of the Santa Clara River in 2013, and identified 5 separate least Bell's vireo territories downstream of Interstate 101 over a distance of approximately 0.5 mile. It was impossible to determine during the surveys whether this species was also occupying the north bank due to noise from the highway. Nonetheless, the potential for this species' presence on the City's proposed project site is high. It is important to note that this species established territories not only in riparian habitat,

	but also in adjacent upland habitat.
4.4-11	Given the known presence of five least Bell's vireo territories directly across the river from the proposed project, the potential for this species to occur on the project site is more likely high rather than moderate.
4.4-11	In addition to using riparian habitat, western pond turtles depend on adjacent uplands with a southern exposure and protected from flood inundation for successful breeding. The EIR's impact analysis should consider potential loss of suitable breeding habitat for this species.
4.4-11	The County of Ventura's list of locally important plants and animals should also be addressed in this document. For example, various species of shoulderband snails are known to occur in the Santa Clara River, some of which are designated locally important.

Letter 8

Commenter: Pam Lindsey, Watershed Ecologist, Ventura County Watershed Protection District

Date: September 19, 2013

Response 8.1

The commenter suggests that two additional agency approvals should be added to the DEIR Executive Summary and notes that references to the Department of Fish and Game should be to the Department of Fish and Wildlife due to a change of that agency's name. The noted approvals have been added to the FEIR Executive Summary and Project Description (Section 2.0). Any remaining references to the Department of Fish and Game have also been corrected in the FEIR.

Response 8.2

The commenter notes an editorial error with respect to a reference to two EIR mitigation measures. The commenter is correct that the reference should be to measures T-1(c) and T-1(d). This has been corrected in the FEIR. Also, please note that these measures have been revised slightly in the FEIR and another option of limiting project area development has been added in case it is determined that physical improvements are either infeasible or undesirable. Thus, the FEIR changes the impact at the Highway 101 Southbound Ramps/Johnson Drive intersection from Class I (unavoidably significant) to Class II (significant, but mitigable).

Response 8.3

The commenter suggests that Measure T-1(d) would create a traffic hazard by requiring drivers to make a U-turn at the Motel 6 driveway. This concern is noted and is specifically identified in the DEIR. The mitigation measure has been revised to require a traffic signal at the Motel 6 driveway on Johnson Drive if either of the potential improvements at the Highway 101 Southbound Ramps/Johnson Drive intersection is implemented. Also, please see Response 8.2.

Response 8.4

The commenter states that the discussion of responsible and trustee agencies should mention the Los Angeles RWQCB, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service. In response to this comment, the third and fourth paragraphs under subsection 1.3 of Section 1.0, Introduction, have been revised to read as follows:

> *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 Wildlife (CDFW) is a trustee agency for the project and has authority over wetland and riparian resources within the project area. The CDFW will be responsible for issuing a streambed alteration agreement for the project. The Los Angeles Regional Water Quality Control Board (RWQCB) is responsible for maintaining the quality of waters of the state. The RWQCB would be responsible for issuing a Waste Discharge Requirement (WDR)for certain components of the project.*

> *The U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and National Marine Fisheries Service are ~~is~~ not ~~a~~ responsible or trustee agencies~~y~~ for the project since they are ~~it is~~ a federal agency; however, the Corps of Engineers has authority over the placement of fill materials in a river channel and will be responsible for issuing a 404 permit for the levee component of the project, while the Fish and Wildlife Service and National Marine Fisheries Service are responsible for protection of species that could be affected be aspects of the project.*

Response 8.5

The commenter suggests that U.S. Army Corps of Engineers standards for vegetation on levee structures conflict with the DEIR's description of the proposed project. Vegetation on the levee would conform to Corps of Engineers standards. In response to this comment, the third sentence of the first paragraph under subsection 2.4.2 of Section 2.0, Project Description, has been revised to read as follows:

> *The levee bank and toe protection adjacent to the Santa Clara River would primarily consist of rock riprap and vegetated slopes that conform to U.S. Army Corps of Engineers standards, but would vary in size and depth depending on the calculated design flow velocities.*

Response 8.6

The commenter suggests that the description of some components of the proposed levee is unclear and requests a figure showing the locations of various project components. In response to this comment, Figure 2-2a has been revised to more clearly delineate the floodwall portion of the levee/floodwall system in the eastern portion of the project site and to delineate which portions of the system would be a levee versus a floodwall. In addition, figures 2-2c and 2-2d have been added to provide additional details regarding the layout of the eastern portion of the system and to show the proposed outlet for Moon Ditch.

Response 8.7

The commenter suggests a clarification in the EIR project description related to the levee being contemplated by the City of Oxnard. In response to this comment, the paragraph regarding to the City of Oxnard levee on DEIR page 2-7 has been revised to read as follows:

> *The City of Oxnard is also contemplating improvements to and extension ~~construction~~ of a levee on the south side of the Santa Clara River. The~~is~~ existing levee is about 1.6 miles in length and a 0.5-mile extension is being contemplated. With this extension, the levee would be approximately 2.1 miles in length and would extend southwest from the U.S. Highway 101 overpass to near the South Victoria Avenue overpass. The existing levee also needs to be improved to meet FEMA certification requirements. Although not part of the proposed project, the design of these~~is~~ levee improvements would be coordinated with the proposed levee on the Ventura side of the Santa Clara River. The environmental review considers potential hydrological impacts of the proposed Ventura levee both with and without the levee improvements being contemplated by the City of Oxnard.*

Response 8.8

The commenter asks why mitigation has not been identified for the significant cumulative aesthetic impact. The cumulative aesthetic impact relates to the conversion of agricultural lands to a non-agricultural use, an impact that was identified for citywide buildout in the 2005 General Plan FEIR. Feasible mitigation is not available for the project's contribution to this significant cumulative aesthetic impact. Outside of leaving project site agricultural lands in their current agricultural use, the project's contribution to this impact cannot be mitigated. The City will need to adopt a Statement of Overriding Considerations for this unavoidably significant cumulative impact. It should be noted, however, that although the proposed project would incrementally contribute to the citywide cumulative impact, the project's aesthetic impact was not identified as significant. In addition, a mitigation measure has been added to the Final EIR requiring future project site developers to either purchase agricultural easements to offset the loss of Prime and Statewide Importance farmland or contribute funds to an organization or agency that would use the funds for purchase of agricultural easements.

Response 8.9

The commenter notes that biological surveys were conducted when endangered least Bell's vireo and southwestern willow flycatcher would not be present. The commenter previously conducted protocol surveys for both species along the Santa Clara River in 2013 and identified 5 separate least Bell's vireo territories downstream of Highway 101 over a distance of approximately 0.5 miles, along the south bank of the river. Based on this information, the commenter recommended changing the potential for this species to occur along the north bank and within the project area from moderate to high.

In response to this comment, the next to last sentence of the first paragraph on page 4.4-11 of DEIR Section 4.4, *Biological Resources*, has been revised to read as follows:

> *Due to the extent of available habitat, least Bell's vireo are considered to have a moderate to high potential to occur. Due to the more limited amount of suitable habitat preferred by and available to southwestern willow flycatcher, this species is considered to have moderate potential to occur.*

In addition, the entry for Least Bell's vireo in Table C-1 of DEIR Appendix C has been revised to read as follows:

> *Moderate. High. Suitable foraging and nesting riparian habitat in the eastern portion of the site and study area. Recorded occurrences within the Santa Clara River adjacent to eastern portion of the site (CNDDB) and along the southern bank of the river, south of the project site (Ventura County Watershed Protection District).*

The commenter also suggests that it should be noted that least Bell's vireo establishes territories in riparian and adjacent upland habitats. While the species may sometimes utilize and defend upland habitat that is adjacent to their main core territory within a riparian corridor, they are primarily dependent upon and associated with riparian habitat for breeding and foraging. Further, the upland habitat adjacent to the Santa Clara River within the project site is ruderal, highly disturbed, and is not suitable for least Bell's vireo, nor would they be expected to incorporate this habitat within their territory due to the limited type and height of vegetation

that occurs there. As stated in the DEIR, no native riparian habitat within or east of the project site will be removed during project build-out. Therefore, the upland habitat adjacent to the river, within the project site, is not considered suitable for least Bell's vireo and no additional edits were made regarding this species' habitat.

Response 8.10

The commenter states that western pond turtles depend on adjacent uplands with a southern exposure and protected from flood inundation for successful breeding. The EIR's impact analysis should consider potential loss of suitable breeding habitat for this species.

In response to this comment, the following has been added to the end of the last full paragraph on DEIR page 4.4-11:

> *Western pond turtle also utilize sandy banks or grassy open fields to lay their eggs. Nesting can occur up to 1000 feet from aquatic sites, but the majority of nests are located within 500-600 feet. Slope of the nest sites range up to 60%, but most nests are on slopes <25%. Hatchlings require shallow water habitat in their first year with dense submergent or short emergent vegetation. Several areas with slopes suitable for nesting occur south and east of the existing and proposed road.*

In addition, the discussion of western pond turtle on page 4.4-22 has been revised to read as follows (beginning with the second full sentence of the first paragraph on that page):

> *As such, no direct impacts to species expected to be associated with this habitat, including silvery legless lizard, western pond turtle, and two-striped garter snake, are expected. Direct impacts to coast horned lizard and northern Bryant's woodrat occurring within the mulefat scrub habitat, which is expected to be impacted during construction of the levee, could occur during levee construction. Direct impacts to western pond turtle and indirect impacts to suitable nesting habitat could occur during construction within upland areas immediately adjacent to the riparian corridor. However, the number of individuals expected to occur within the 0.5 acres of these habitats that could be impacted is expected to be low and direct impacts to these individuals would not have a substantial adverse effect on these species populations, as defined by the CEQA Appendix G guidelines.*

Response 8.11

The commenter suggests that the County of Ventura's list of locally important plants and animals should also be addressed in this document. For example, various species of shoulderband snails are known to occur in the Santa Clara River, some of which are designated locally important.

Rincon's Ventura County approved biologist reviewed the County's Locally Important Animal and Plants List in preparation of biological surveys and the EIR in 2012. Because of the level of habitat disturbance within the project site, none of these species were anticipated to be present or were observed during surveys.

VENTURA COUNTY WATERSHED PROTECTION DISTRICT
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
Tom Wolfington, Permit Manager – (805) 654-2061

MEMORANDUM

DATE: September 16, 2013

TO: Laura Hocking, Case Planner
Resource Management Agency, Planning Division

FROM: Tom Wolfington, P.E. – Permit Section JW
(805) 654-2061

SUBJECT: RMA 10-043-2 – Olivas Park Drive Extension –Draft Environmental Impact Report (DEIR), August 2013
City of San Buenaventura EIR-11-10-4397
APN 138-0-230-750, 40.38 Acres, Hofer Properties
APN 138-0-230-820, 7.16 Acres, MBL Golf Course LLC
APN 138-0-230-650, 12.51 Acres, Hofer Properties
APN 138-0-230-160, 3.03 Acres, Hofer Industries LLC Lessor
APN 138-0-230-150, 1.297 Acres, Hofer Vineyards LLC
APN 138-0-230-740, 0.77 Acres, Hofer Vineyards LLC
APN 138-0-230-130, 3.87 Acres, Hofer Vineyards LLC
APN 138-0-230-730, 1.84 Acres, Hofer Properties
APN 138-0-230-760, 5.92 Acres, Hofer Properties
APN 138-0-230-210, 7.31 Acres, Hofer Paul B ET AL
APN 139-0-010-575, 1.49 Acres, San Buenaventura City of
APN 179-0-050-030, 6.65 Acres, Montalvo Municipal Imp Dist
APN 179-0-050-160, 37.28 Acres, Ventura Olivas Co.
APN 179-0-050-150, 11.99 Acres, Ventura Olivas Co
Public Right-of-Way for Olivas Park Drive, Ventura Road, Ventura County Flood Control District, Auto Center Drive, Johnson Drive and Highway 101

The Ventura County Watershed Protection District (District) has reviewed the City of Ventura's request for technical input on the Draft Environmental Impact Report (DEIR) for the proposed Olivas Park Drive Extension, as requested in the City's Revised Notice of Preparation, dated August 2013. The above listing of Assessor's Parcel Numbers was taken from available County of Ventura GIS resources and it is noted that the 2010 Draft Initial Study (EIR-11-10-4397) included somewhat different Assessor's Parcel Numbers.

PROJECT LOCATION

The project site is located adjacent to and northerly of the Santa Clara River, adjacent to and southerly of Auto Center Drive, and adjacent to and westerly of

Perkin Avenue and Johnson Drive in the City of Ventura. A portion of the proposed Olivas Park Drive extension is in unincorporated Ventura County (parcel APN 179-0-050-030, Montalvo Municipal Imp District). The proposed extension would also encroach onto properties within the jurisdictional boundaries of the City of Ventura owned by Hofer Properties (parcel APN 138-0-230-750), the Ventura Olivas Co. (parcel APN 179-0-050-160), and the City of Ventura (parcel APN 139-0-010-575). It would also traverse Moon Ditch which is a District jurisdictional red line channel.

WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:

The District provided comments to the City of Ventura's Olivas Park Drive Extension Revised Notice of Preparation (NOP) and Draft Environmental Impact Report (DEIR) (City of Buenaventura EIR-11-10-4397) on January 17, 2013. Comments addressed the acknowledgment of the Ventura County Watershed Protection District as an affected study area landowner and regulatory permitting agency, acknowledge that Moon Ditch is a major flood control channel that is under the jurisdiction of the District, floodplain and regulatory floodway conditions, the District's standard of stormwater runoff, and geotechnical considerations for road and building construction, bikeways and multi-purpose trails. Although a number of our January 17, 2013 concerns were discussed in the DEIR, some remain unaddressed and we request that they be included in the final environmental report. Our comments are as follows:

1. In an exhibit prepared by the City of Ventura's engineering consultant, Hawks and Associates entitled "Olivas Park Drive Extension Proposed Setback Levee: Preliminary Plan and Profile" dated December 14, 2011 it was illustrated that the proposed levee/floodwall will cover a major portion of Moon Ditch and the alignment of Olivas Park Drive will cross over Moon Ditch.

   (a) Please acknowledge that the Ventura County Watershed Protection District is a property and a facility owner in the Olivas Park Drive Extension Study Area. This is above and beyond the regulation of a storm drain connection to the Santa Clara River. As a special district, the District should be differentiated from other County Agencies.

   (b) Please acknowledge that Moon Ditch is a major flood control channel that is under the jurisdiction of the District. It is referred to as a red line jurisdictional channel.

   (c) All design alternatives for the road alignment and levee/floodwall presented in the final EIR should include an analysis of the impacts on

this facility in terms of construction, cover, capacity and similar matters. Local drainage should be directed, to the extent possible, to City storm drain facilities which in turn connect to Moon Ditch or the Santa Clara River.

2. The DEIR should describe the effective floodplain and the regulatory floodway of the project site under existing conditions. Also, a discussion should be included regarding the on-going FEMA Santa Clara River Flood Insurance Re-study effort and its potential impact on the floodplain and floodway of the project site. Anticipated changes of floodplain and floodway under the proposed conditions, along with such effects as potentially increased bank erosion, should be described.

3. The DEIR documented the modeling results for three design scenarios:
   - Proposed conditions with only the north bank levee
   - Proposed conditions with only the south bank levee
   - Proposed conditions with the north and south bank levees.

   In any improvement condition, encroachment into the floodplain shall not cause the water surface elevation to rise by more than one foot. This is not the case in the summary on Page 8 and in Table 2 on the same page. The printouts of the modeling results support the no-more-than-one-foot-rise encroachment analysis. Therefore, the summary in Table 2 is not supported by the modeling results. Please check the table and make any necessary corrections.

4. While comparisons of the floodplain water surface elevation, velocity, and top width in Sections 4.1, 4.2, and 4.3 are necessary and useful, such needs for Sections 4.4, 4.5, and 4.6 are unclear and confusing. It is recommended that these sections be removed from the report.

5. The DEIR and Draft Initial Study should address the impacts of potential flooding along the Oxnard side of the Santa Clara River. Particular attention should be paid for the potential to impact the design of the deficient levee on the Oxnard side from the impacts of removing a large area of Ventura property from the floodway, and that the timing of the projects needs to coincide. A discussion of the coordination between the Cities and the District in the conceptual and design stages should be discussed in the DEIR as well as timing and funding issues. Any study including preliminary hydraulics should insure the use of the latest available flow rate values for this reach of the Santa Clara River.

6. Please include a statement that modification of the regulatory floodway at the project site should be achieved through consultation with the Federal Emergency Management Agency (FEMA), City of Oxnard, the County of Ventura floodplain manager, the District, and other stakeholders.

7. Although some discussion was presented in the DEIR concerning alternative transportation features and recreational options as part of the levee design, the District feels that additional details regarding design and maintenance should be discussed in the final Environmental Impact Report (EIR). Please acknowledge in the EIR that the District is frequently approached for joint use of service roads as bikeways or multi-use trails. While frequently recognized as a public benefit, such use can impact the District's ability to maintain its flood control facilities. Further, any conceptual or proposed alternative routes for bikeways or multi-purpose trails should be identified and discussed within the EIR to allow evaluation of impacts before plans are formalized.

8. The DEIR should include preliminary exhibits showing all existing and proposed utilities and all related infrastructure features within the extent of the existing and proposed floodplain and floodway boundaries.

END OF TEXT

Letter 9

Commenter: Tom Wolfington, P.E., Permit Manager, Ventura County Watershed Protection District

Date: September 16, 2013

Response 9.1

The commenter notes that the parcel numbers listed in the 2010 draft Initial Study are somewhat different than those listed in the DEIR. The project boundaries changed slightly since 2010. An updated Initial Study / Notice of Preparation was circulated in December 2012.

Response 9.2

The commenter suggests several editorial changes to acknowledge the role of the Watershed Protection District and the importance of Moon Ditch. As the commenter indicates, Moon Ditch is a VCWPD flood control channel. Environmental impacts related to the changes to this channel have been addressed. Remaining engineering issues related to operation of the channel will be resolved during final design.

Response 9.3

The commenter requests that the DEIR include additional information about the current floodplain / floodway and anticipated changes to the floodplain / floodway with the project. Current flood zones are described on page 4.7-2 of DEIR Section 4.7, *Hydrology and Water Quality*, and illustrated on Figure 4.7-1. Changes in floodplain / floodway conditions are described under Impact HWQ-3, beginning on DEIR page 4.7-7, and under Impact HWQ-5, beginning on page 4.7-16. The DEIR acknowledges that FEMA is re-studying the Santa Clara Flood Insurance Rate Map, but at this point the final results of that re-study are not available.

Response 9.4

The commenter suggests that the summary of the hydraulic analysis in DEIR Appendix E is not supported by the modeling results. Actually, both the modeling results and Table 2 of the Hydrology and Hydraulic Analysis indicate that under both the north levee only scenario and the north and south levee scenario, the rise in the 100-year floodplain water surface elevation would exceed one foot in some locations. Under the north and south levee scenario, areas affected by the rise in water surface elevation would be entirely between the levees; therefore, this scenario would not adversely affect any private property or improvements. However, under the north levee only scenario, some developed areas in Oxnard could be affected by the rise in water surface elevation. To address this potential issue, the FEIR includes the following mitigation measure (note that the measure has been revised slightly since the circulation of the DEIR in order to clarify the measure's intent):

HWQ-3(b) Project Timing. Adequate flood protection shall be provided for both the project area and potentially affected areas along the south side of the Santa Clara River in the City of Oxnard prior to project area construction other than the extension of Olivas Park Drive . Construction of the north and south levees shall be coordinated to

> the extent feasible to ensure that neither the project site nor any developed areas in Oxnard would experience an increase in surface water elevation of more than one foot during a 100-year flood event.

Response 9.5

The commenter states an opinion that the comparisons provided in sections 4.4, 4.5, and 4.6 of the Hydrology and Hydraulic Appendix (DEIR Appendix E) are confusing. It is unclear based on the comment why the commenter believes that the information provided is confusing. In the absence of a clear reason to remove this information, the information has been left in the FEIR appendix. A summary of the findings contained in the Hydrology and Hydraulic Appendix can be found in DEIR Section 4.7, *Hydrology and Water Quality*.

Response 9.6

The commenter suggests that the DEIR should address the impacts of potential flooding in Oxnard and the need for coordination between the cities of Ventura and Oxnard. The discussion of Impact HWQ-3 in DEIR Section 4.7 specifically discusses the levee improvements proposed by the City of Oxnard and acknowledges that if only the levee proposed as part of the Olivas Park Drive Extension project is built, additional flooding would occur in Oxnard (see page 4.7-13). To address this potential impact, Mitigation Measure HWQ-3(b) requires the City of Ventura to ensure that adequate flood protection has been provided for both the project area and potentially affected areas along the south side of the Santa Clara River in Oxnard prior to project area construction other than the roadway and levee. That measure also specifies that construction of the north and south levees are to be coordinated to the extent feasible to ensure that the area of the floodplain in the south overbank area would not be increased as a result of the proposed project.

Response 9.7

The commenter requests that the DEIR include a statement regarding consultation with various agencies regarding modifications to the regulatory floodway. In response to this comment, the following statement has been added at the beginning of the "Mitigation Measures" discussion Under Impact HWQ-3 in Section 4.7:

> *Any modifications to the regulatory floodway for the Santa Clara River will be achieved through consultation with the Federal Emergency Management Agency (FEMA), the City of Oxnard, the County of Ventura floodplain manager, the Ventura County Watershed Protection District, and other stakeholders. The following mitigation measures are required.*

Response 9.8

The commenter requests additional details regarding alternative transportation features associated with the proposed levee. Contrary to what is stated in the DEIR Project Description, a bike path will not be included in the levee. Section 2.0 has been corrected to exclude this statement. Rather, bike lanes will be provided along the Olivas Park Drive extension. The removal of the Class I bike path along the levee does not affect the DEIR findings or conclusions.

Response 9.9

The commenter requests preliminary exhibits showing existing and proposed utilities and related infrastructure. Such exhibits are not available at this time. However, as discussed in Section 2.0, *Project Description*, the proposed project would involve the construction of ancillary infrastructure improvements, including: water mains; sewer lines; reclaimed water lines; storm drainage facilities; and electrical and natural gas lines. As described in Section 4.10, *Utilities and Service Systems*, the Montalvo Community Services District (MCSD) wastewater treatment facility is proposed for abandonment as part of a separate action. Because the alignment of the proposed roadway extension and levee/floodwall intersects the MCSD property, the City of Ventura has agreed to divert the wastewater that is currently processed at the Montalvo facility through a tie-in via a 15-inch sewer line to the existing 36-inch Bristol Relief Sewer located in Golf Course Drive. The Olivas Park Drive extension would include wastewater infrastructure to link the existing sewer lines located in Perkin Avenue with the wastewater that is received at the MCSD facility. All wastewater from this vicinity would then be treated at the City's main treatment facility (Ventura Water Reclamation Facility) at Harbor Boulevard. This explanation had also been added to Section 2.0 of the FEIR for clarification.

Development Services

300 West Third Street
Oxnard, CA 93030
(805) 385-7430
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www.ci.oxnard.ca.us

CITY OF OXNARD CALIFORNIA

September 20, 2013

Chandra Chandrashaker
Department of Community Development
501 Poli Street
Ventura, CA 930122-0099

RE: Comments on Draft EIR for Olivas Park Drive Extension

Dear Ms. Chandrashaker:

This letter serves as the City of Oxnard's response to the Notice of Availability of a Draft EIR for the Olivas Park Drive Extension Project of approximately 112 acres between Gold Course Drive and Johnson Drive, along the north bank of the Santa Clara River.

The City has no comments on the Draft EIR itself, but does provide comments on the Hydrology and Hydraulics Appendix and, we assume, corresponding changes may be required in the Draft EIR by the comments on the appendix.

Hydrology and Hydraulics Appendix Comments:

1. Page 11, Section 4.3 – the second paragraph of this section states that "If only the south levee is built, it removes 110 acres from the Oxnard floodplain and there is no change to the floodplain of the north overbank." This statement appears to significantly understate the amount of floodplain area that would be removed by the development of a south levee. It seems the removed area calculation was limited by the arbitrary "limit of study area" lines indicated on the exhibit. The actual floodplain area that would be removed on the Oxnard site of the river would be significantly more than 110 acres. This same misstatement occurs in sections 5.2 and 5.3. The removed area calculation should be consistent with FEMA and appropriate floodplain maps.
2. Exhibits A, B, C, and D appear to have an error in the river cross sections, showing cross section 24213 in two locations just upstream of the UPRR bridge.
3. River cross section stationing is usually assigned in numerical order. However, in Exhibits A, B, C, and D section 23892 is indicated upstream of station 24213.

If you have any questions, please feel free to call.

Sincerely,

Chris Williamson

Chris Williamson, AICP
Principal Planner (805) 385-8156

Letter 10

Commenter: Chris Williamson, AICP, Principal Planner, City of Oxnard

Date: September 20, 2013

Response 10.1

The commenter suggests that the discussion of the south levee in Oxnard in DEIR Appendix E understates the amount of floodplain area that the south levee would remove. In response to this comment, the paragraph in question has been revised to read as follows:

> *In the north levee only scenario, 107 acres are removed from the floodplain of the north bank, but there is an additional 19 acres of inundation on the south overbank area. If only the south levee is built, it removes 110 acres within the study area from the Oxnard floodplain as well as substantial additional acreage outside the study area and there is no change to the floodplain of the north overbank. The combination of the north and south levees removes 107 acres from the north overbank and 110 acres within the study area plus substantial additional acreage outside the study area from the south overbank.*

Response 10.2

The commenter suggests that the cross sections shown in Appendix E have an error, showing the same cross section in two locations. This is not an error. HEC RAS requires two (2) identical sections for bridge upstream analysis.

Response 10.3

The commenter suggests revisions to the order of the river cross sections in Appendix E. In response to this comment, the numbering of the sections on the exhibits has been changed. However, the actual computer analysis is correct.

September 21, 2013

Lucho Rodriguez
Ventura Planning Department
501 Poli Street,#120
Ventura, CA 93002

RE: DEIR Olivas Park Drive Extension

This letter is in response to the above DEIR, regarding Cultural Resources. I am expressing the concerns of the Chumash community in Ventura County. The area of concern is a large amount of acreage that will probably not be developed all at once.

I understand much of the soil has been disturbed by farming on the surface of the soil. We are concerned for undiscovered resources that my lie deeper underground. The Chumash were known to inhabit this area and we would like to ensure that current surveys and testing have been completed beyond a phase 1 surface check. The reason for responding to this as well, is because all sites are not known by the Native American Heritage Commission. That is why they refer you to the local contacts in your county for more information on these areas of concern.

I would also like to request that when surveys are completed in locations sensitive to cultural materials, that you include a local Native American monitor on your team. It is important to us to participate in surveys as well as to be present during the excavation period in construction projects . This allows for an experienced person to be available to identify cultural resources should they appear and not have to rely on inexperienced construction personnel to make the identification. Not only are burials of importance to us but remains of artifacts and other items belonging to a people no longer here. It is important to us to properly find disposition of these items as well as following the guidelines for human remains.

The excavation period of a project is a small portion of the project as a whole. I hope you can incorporate to have a monitor present during these periods. Should an archaeologist be needed as well is up to the city to make the decision. Considering these measures offsets any Impacts to intact resources. Should you need any added information, please feel free to call or Meet with us. Thank you.

Susie Ruiz Parra
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Ventura, CA 93004
(805) 443-8599 or
(805) 323-7193

Letter 11

Commenter: Susie Ruiz Parra

Date: September 21, 2013

The commenter notes the general concerns of the local Chumash community and suggest that Native American monitors should be present for any further surveys and/or excavation onsite. As discussed in the Initial study and in the response to Letter 2, the project area has been surveyed in the past and known cultural resources are not present. Nevertheless, in the event that archaeological resources are unearthed during project construction, it is standard City practice to temporarily suspend work until an archaeologist has evaluated the nature and significance of the find pursuant to General Plan Action 9.15. If resources are encountered, General Plan Action 9.15 requires the developer to hire an archaeologist to oversee the handling of archaeological materials with coordination with the Ventura County Archaeological Society and local Native American organizations as appropriate.