4.15 PUBLIC SERVICES AND RECREATION

This section evaluates the potential effects of implementing the 2040 General Plan on public services and recreational facilities, including law enforcement, fire protection, emergency services, schools, libraries, and parks and recreation. As described in the "Approach to the Environmental Analysis" section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan's potential impacts.

One letter received in response to the notice of preparation provided comments on public services. This letter, from the City of Santa Paula, provides information regarding law enforcement, fire protection, and recreation facilities provided by the City, and comments on the need for cooperative planning for emergency services, recreation, and fire protection services. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.15.1 Background Report Setting Updates

REGULATORY SETTING

The Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation in Chapter 7, "Public Facilities, Services, and Infrastructure." There is no additional information necessary to understand potential impacts on public services and recreation related to the 2040 General Plan. Specifically, this section of the draft EIR is based on the regulations provided in Section 7.5, "Law Enforcement," Section 7.6, "Fire Protection," Section 7.7, "Emergency Services," Section 7.9, "Schools and Child Care," Section 7.10, "Library Services," and Section 7.11, "Parks and Recreation Services."

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation in Chapter 7, "Public Facilities, Services, and Infrastructure." There is no additional information necessary to understand the potential impacts on public services and recreation related to the 2040 General Plan. Specifically, this section of the EIR is based on the environmental setting provided in Section 7.5, "Law Enforcement," Section 7.6, "Fire Protection," Section 7.7, "Emergency Services," Section 7.9, "Schools and Child Care," Section 7.10, "Library Services," and Section 7.11, "Parks and Recreation Services."

4.15.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis evaluates impacts on public services and recreation based on the potential for future development under the 2040 General Plan to create increased demands for public services and recreational facilities, which could result in the provision of new or physically altered facilities to maintain service ratios, response times, or other performance objectives, the construction of which could cause significant environmental impacts. Public services and recreational facilities evaluated in this section include law enforcement and emergency services, fire protection services, schools, libraries, and parks and recreation. The goals and policies of the 2040 General Plan were reviewed with respect to measures that would provide for oversight and approvals of the expansion of public services by the appropriate agency, promote actions that ensure the continued provision of adequate public services, and avoid or substantially lessen potential environmental impacts when the provision of new or physically altered facilities is required in response to increased demand. This analysis incorporates the principals of the methodology applied in the Initial Study Assessment Guidelines (ISAG), as discussed in detail below.

Law Enforcement and Emergency Services

The ISAG law enforcement threshold criterion lists categories of land uses that have the potential to increase demand for law enforcement or emergency services. The criterion also lists security measures needed to address potential increases in criminal activity (e.g., security lighting, window and door locks, defensible space) and concludes that projects that incorporate adequate security measures would have a less than significant impact on law enforcement and emergency services. However, at the general plan level project-specific security measures are not known. Future growth demands, especially high-density development or development that would be located far from existing developed areas, may increase demand for law enforcement services to a degree that new or physically altered law enforcement facilities would be required, even if future development includes adequate security measures. Therefore, the 2040 General Plan is evaluated with respect to goals and policies that address the provision of security measures for new or expanded development in the unincorporated county, and with respect to the potential need for additional law enforcement services as a result of growth.

Fire Protection Services

Under the ISAG, the determination of whether a project would have a significant environmental impact on fire protection services is based on the project's distance to a full-time fire station and corresponding response times. Additionally, equipment and facility concerns become significant when the magnitude of a project or the distance from existing facilities requires that a new facility or additional equipment be provided to serve the project. At the general plan level, the land use type and population density of future development would be factors in determining the impact on fire protection services. Large developments, high-density developments, or projects that are far from existing developed areas would be more likely to require expanded or new fire protection facilities.

Education - Schools

The ISAG methodology is specific to determining whether a project would interfere with an operating school or result in additional demand for school services. With respect to school enrollment, ISAG Section 34a notes that the development fees authorized by Senate Bill 50 are deemed to be "full and complete school facilities mitigation" pursuant to Section 65996 of the California Government Code. Therefore, the increase in student enrollment because of new development is not addressed further in this section. Rather, this analysis considers whether forecasted population growth over the life of the 2040 General Plan would result in development that could generate the need for new or expanded school facilities, the construction of which would result in substantial significant environmental impacts.

Education - Public Libraries

The ISAG states a project would have a significant project-specific impact on public library facilities and services if it would substantially interfere with the operations of an existing public library facility or put additional demands on a public library facility that is currently deemed overcrowded. Large developments or high-density developments would be more likely to cause overcrowding and create demand for new facilities, the construction of which could result in significant environmental impacts. Projects that are located outside of existing developed areas would be more likely to require expanded or new library facilities.

Recreational Facilities

A project would have a significant impact on recreation if it would cause an increase in the demand for recreation, parks, and/or trails and corridors or would cause a decrease in recreation, parks, and/or trails or corridors when measured against the ISAG standards. The ISAG standards for measuring impacts on recreational facilities are the provision of 5 acres per 1,000 population for local and regional parks and facilities and 2.5 miles per 1,000 population for regional trails and corridors. The standards also state that a project would have a significant impact on recreation if it would impede future development of recreation parks and facilities, or regional trails and corridors.

As with other public services, future residential development that would accommodate forecasted population growth would increase demand for parks and recreation facilities, which in turn could result in significant impacts.

THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on the County's adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project's impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the following thresholds were developed from the ISAG by deriving the performance objectives that could generate an effect on provision of public services and recreational facilities. Additionally, the potential for environmental impacts to result from actions needed to maintain acceptable service ratios was evaluated by expanding the thresholds to include the consideration of substantial adverse physical impacts associated with the provision of new or physically altered public facilities and recreational facilities in Appendix G questions XV.a and XVI.b.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant public services and recreation impact if it would:

- Result in development that would not include adequate security measures to address increased demand for law enforcement or emergency services such that there could be substantial adverse physical impacts associated with the provision of new or physically altered facilities;
 - Categories of projects that have the potential to increase demand for law enforcement or emergency services include: agricultural uses, amusement, recreation, and sport facilities, automobile impound yards, banks and financial institutions, bars, taverns and nightclubs, boarding houses and bed-and-breakfast inns, bus and train terminals, care facilities, cemeteries, clubhouses, conference centers/convention centers, dwellings, educational institutions, temporary events, government building, health services, including clinics, hotels, motels, hospitals, laboratories (research and scientific), libraries, manufacturing, ministorage, parking facilities, projects with walls or fences susceptible to graffiti, rental and leasing of durable goods, retail trade, and salvage yards.
 - Security measures considered adequate include: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.
- Result in development located in excess of 5 miles from a full-time paid fire department (distance measured from the apron of the fire station to the structure or pad of a proposed structure) or result in response times in excess of 12 minutes such that there could be substantial adverse physical impacts associated with the provision of new or physicallyaltered facilities.
- ▶ Require new fire prevention/suppression facilities or additional equipment as a result of the project magnitude or distance from existing facilities such that there could be substantial adverse physical impacts associated with the provision of new of physically altered facilities.
- Result in development that would substantially interfere with the operations of an existing school facility such that there could be substantial adverse physical impacts associated with the provision of new or physically altered facilities.
- ▶ Result in development that would generate the need for new or expanded school facilities, the construction of which would result in substantial significant environmental impacts.

- Result in development that would substantially interfere with the operations of an existing public library facility, put additional demands on a public library facility which is currently deemed overcrowded, or limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes such that there could be substantial adverse physical impacts associated with the provision of new or physically-altered facilities.
- Result in development that would cause an increase in the demand for recreational facilities, parks, and/or trails and corridors, or that would cause a decrease in recreation, parks, and/or trails or corridors, such that there could be substantial adverse physical impacts associated with the provision of new or physically-altered facilities, when measured against the following standards:
 - Local Parks/Facilities 5 acres of developable land (less than 15-percent slope) per 1,000 population,
 - Regional Parks/Facilities 5 acres of developable land per 1,000 population, and
 - Regional Trails/Corridors 2.5 miles per 1,000 population.

ISSUES NOT DISCUSSED FURTHER

The ISAG threshold criterion for Education - Schools addresses potential project interference with operations of an existing school. The 2040 General Plan provides for orderly growth and future development, which would be concentrated within the Existing Community area designation (boundary) and Urban area designation (boundary). The proposed land use diagram geographically defines the nature of the future development that could occur over the life of the general plan. This type of programmatic land use planning would reduce the potential for interference with school operations.

With respect to school enrollment, ISAG Section 34a notes that the development fees authorized by Senate Bill 50 are deemed to be "full and complete school facilities mitigation" pursuant to Section 65996 of the California Government Code. These provisions would remain in place so long as subsequent State bonds are approved and available. The requisite school fees would be collected before issuance of building permits, which would ensure that potential impacts remain less than significant. Therefore, this topic is not addressed further in this section.

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to public services and recreation. The 2040 General Plan would not result in substantive changes to Area Plan goals and policies related to law enforcement and emergency services, fire protection, libraries, schools, and parks and recreation facilities. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following discussions. Therefore, the environmental effects of the Area Plan goals and policies are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to public services and recreation and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- Policy LU-1.1: Guidelines for Orderly Development. The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as
 Existing Communities and unincorporated urban centers consistent with the Guidelines
 for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC) [Source: Existing
 GPP Goal 3.1.1.2 and Goal 3.1.1.5, modified]
- ▶ Policy LU 12.1. Parks and Recreation Facilities. The County shall support the development of parks and recreation facilities within areas designated as Existing Community, Area Plans or Areas of Interest.

Public Facilities, Services, and Infrastructure Element

- Policy PFS-9.1: Library Programs, Services, and Resources. The County shall continue to provide access to library facilities and services throughout the county. Library programs, services, and resources shall be periodically evaluated to identify opportunities to expand vocational training, literacy, life skills, lifelong learning, health, and wellness programs. (SO) [Source: New Policy]
- Policy PFS 9.5: Library Facilities as Part of Affordable Housing Projects. The County shall consider opportunities to partner with affordable housing developers to leverage development or renovation of community library facilities as part of the housing development strategy. (IGC, JP, FB) [Source: New Policy]
- ▶ Policy PFS-10.5: Parkland Dedication Requirement. The County shall require discretionary development to provide new trails and/or parkland dedication, or equivalent inlieu fees, based on a standard of five acres of local parkland per thousand population in accordance with the Quimby Act (Gov. Code, § 66477) and County Quimby Ordinance (contained in Ventura County Subdivision Ordinance). Any lands dedicated to meeting this requirement shall be accessible to the general public. (SO, RDR) [Source: Existing GPP Policy 4.10.2.1, modified]
- Policy PFS-10.6: Additional Lands for Recreation Use. As part of subdivision development, the County shall encourage developers to set aside unused open space for active and passive recreational uses. (RDR) [Source: Existing GPP Policy 4.10.2.3, modified]
- ► Policy PFS-10.7: Parkland Development, Operation, and Maintenance. The County shall require discretionary projects to provide funding for development, operation, and maintenance of park facilities appropriate to serve the needs of the project. (SO, RDR) [Source: Existing GPP Goal 4.10.1.2, modified]

- ▶ Policy PFS-10.8: Discretionary Development near Trails. The County shall require discretionary development near existing trails to mitigate or avoid adverse impacts to the existing trail system. (RDR) [Source: Existing Ojai Valley Policy 4.7.2.1, modified]
- ▶ Policy PFS-11.1: Emergency Response. The County shall maintain adequate staffing, equipment, and facilities to provide timely and effective responses to emergencies. (FB, SO) [Source: New Policy]
- Policy PFS-11.4: Emergency Vehicles Access. The County shall require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles, including two points of access for subdivisions and multifamily developments. (RDR) [Source: Existing Oak Park Area Plan Goal 4.5.1.2, modified]
- ▶ Policy PFS-11.8: Avoidance of Surveillance Interference. The County shall condition discretionary development to avoid landscaping which interferes with police surveillance (e.g., landscaping must not cover any exterior door or window, landscaping at entrances and exits or at any parking lot intersection must not block or screen the view of a seated driver from another moving vehicle or pedestrian, trees must not be placed underneath any overhead light fixture which would cause a loss of light at ground level). (RDR) [Source: Existing GPP Policy 4.7.2.4, modified]
- ▶ **PFS 12.2: Fire Station Locations.** The County shall work with the Fire Protection District to site fire stations in locations **Policy** central to the area served and on or near arterial highways to minimize call response time. (IGC) [Source: Existing GPP Policy 4.8.2.2, modified]
- ▶ Policy PFS-12.3: Adequate Water Supply, Access, and Response Times for Firefighting Purposes. The County shall prohibit discretionary development in areas that lack and cannot provide adequate water supplies, access, and response times for firefighting purposes. (RDR) [Source: Existing GPP 4.8.2.1, modified and Existing Oak Park Area Plan Goal 4.5.1.2, modified]
- Policy PFS-12.4: Consistent Fire Protection Standards for New Development. The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection. (RDR, IGC) [Source: New Policy]

Implementation Programs

- ▶ Implementation Program N: Open Space Zone for Parks and Recreation. The County shall amend the Non-Coastal Zoning Ordinance to create a new Open Space zone for public lands that will be limited to parks and recreational uses. [Source: New Program]
- ▶ Implementation Program O: Crime Prevention Programs. The County shall continue to support efforts to organize neighborhood, rural, and industrial crime prevention programs. [Source Existing GPP Program 4.7.3.1, modified]
- ▶ Implementation Program P: Adequate Fire Flow. The County shall work with mutual water districts/companies to identify and address the capabilities of each entity to provide adequate fire flows to address existing and potential development (including the anticipated growth of accessory dwelling units), within their service areas. [Source: New Program]

▶ Implementation Program Q: Adequate Fire Flow. The County shall continue to review all new development to ensure that an adequate level of water for fire flow and fire protection can be provided. [Source Existing GPP Program 4.8.3.1, modified]

Conservation and Open Space Element

- ▶ Policy COS-2.7: Preserve Public Access. The County shall work with federal, State, and local jurisdictions, agencies, and organizations to assess the vulnerability of public coastal access points and prioritize protection for those that provide the greatest benefits to residents and visitors. (PSR, IGC, JP) [Source: New Policy, OPR Sea-Level Rise Guidance]
- ▶ Policy COS-9.2: Public Open Space. The County shall explore possible resources for public acquisition of permanent open space for public use. (IGC, JP) [Source: New Policy]
- Policy COS-9.3 Open Space Preservation. The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit. (PSP) [Source: New Policy]

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.15-1: Increase Demand for Law Enforcement and Emergency Services as a Result of Inadequate Security Measures

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

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

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

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

According to the ISAG, land use types that require security measures (e.g., nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols, or design measure to create defensible space) include most urban land uses, including Residential, Mixed Use, Commercial, and Industrial land uses. Because of the programmatic nature of the 2040 General Plan, it is unknown whether specific future projects would include these security measures. The 2040 General Plan does not directly require the provision of security measures associated with discretionary projects as described in the ISAG; however, the 2040 General Plan is consistent with the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). This would concentrate future development in areas with or close to existing public services, which minimizes the need for new or expanded law enforcement or emergency response facilities to serve new development. Policy PFS-11.8 would require that all development provide adequate access for emergency vehicles and maintain conditions necessary to allow adequate police surveillance. Implementation of Policy PFS-11.1 would ensure that adequate staffing, equipment, and facilities are available to provide timely and effective responses to emergencies, while Implementation Program O requires that the County continue to support efforts to organize neighborhood, rural, and industrial crime prevention programs.

Implementation of the 2040 General Plan could allow for future development that does not include the adequate provision of security measures, which could result in adverse effects to the environment due to the provision of new or expanded law enforcement and emergency services that would be needed as a result of inadequate security measures. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure PS-1: New Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures and Emergency Services Access Need

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

Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures

Future discretionary projects shall be reviewed by the County Sheriff's Department to determine whether the project includes adequate security measures and access so as not to exacerbate the need for new law enforcement/emergency services. Security measures considered adequate include but are not limited to: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.

Significance after Mitigation

With implementation of Mitigation Measure PS-1 future discretionary projects would be required to demonstrate the provision of adequate security measures prior to approval by the County. As a result, future development under the 2040 General Plan would not increase demand for new or expanded law enforcement and emergency vehicles as a result of inadequate provision of security measures. Therefore, this impact would be **less than significant**.

Impact 4.15-2: Require Expansion or Construction of New Facilities to Support Law Enforcement and Emergency Services

As noted in Section 7.5, "Law Enforcement," of the Background Report (Appendix B), the County Sheriff employs 1,200 staff members, including 700 sworn positions. The Patrol Division operates seven patrol stations that serve the unincorporated areas of the county, as well as five contract cities. As estimated by SCAG (SCAG 2017), population growth would be approximately 4 percent between 2015 and 2040, resulting in 4,099 new residents (see Chapter 3, "Project Description").

While the 2040 General Plan land use diagram and policies would concentrate future growth in the Existing Community and Urban area designations, the land use diagram also would provide for approximately 1,050 acres of land designated Low-Density Residential and approximately 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase response times for law enforcement and emergency services. The 2040 General Plan requires that the County provide adequate law enforcement and emergency services to county residents (Policy PFS-11.1), and future development, in particular on the edges or outside of existing developed areas, could result in the need for construction of new or expanded law enforcement and emergency response facilities in order to maintain adequate service ratios and other performance standards. The construction of new or expanded facilities could, in turn, result in adverse impacts on the environment, depending on the location of the new facilities.

The potential physical environmental impacts resulting from the construction of new or expanded law enforcement and emergency services facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded utility infrastructure are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded law enforcement and emergency services facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded law enforcement and emergency services facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded law enforcement and emergency services facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded law enforcement and emergency services facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded law enforcement and emergency services facilities in response to increased demand under the 2040 General Plan would be significant and unavoidable.

Impact 4.15-3: Require Expansion or Construction of New Fire Protection Facilities and Services as a Result of Excessive Response Times, Project Magnitude, or Distance from Existing Facilities

As noted in Section 7.6, "Fire Protection," of the Background Report (Appendix B), the Ventura County Fire Department (VCFD) provides a range of programs and services aimed at protecting lives and property from the adverse effects of fires, sudden medical emergencies, exposure to hazardous materials, and other dangerous conditions. It provides a network of fire stations, personnel, and equipment, including 32 stations, 583 personnel, and a fleet of approximately 371 emergency and nonemergency vehicles.

As described above, the 2040 General Plan land use diagram and policies would concentrate future growth in the Existing Community and Urban area designations, the land use diagram also would provide for 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase response times for law fire protection services. Expansion or construction of new fire protection facilities and services may be required to maintain acceptable response times, depending upon the actual location and magnitude of future development under the 2040 General Plan.

The 2040 General Plan incorporates the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.2). The 2040 General Plan further contains policies that, when implemented, would maintain adequate staffing, equipment, and facilities to provide timely and effective responses to emergencies (Policy PFS-11.1) and would require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles. Additionally, the 2040 General Plan encourages investment in facilities and infrastructure and services to ensure public safety and improve quality of life, and requires adequate emergency vehicle access in new discretionary development (Policy PFS-11.4).

However, as discussed above, these policies do not completely prohibit future development outside of these communities, and the land use designations established in the 2040 General Plan would allow for low intensity development throughout much of the county. Therefore, the 2040 General Plan could accommodate future development located in excess of 5 miles from a full-time paid fire department or result in response times in excess of 12 minutes. As a result, new or physically altered fire protection facilities could be required to adequately serve future development, the construction of which could result in substantial adverse physical impacts.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded fire protection facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded fire protection facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded fire protection facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded fire protection facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded fire protection facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded fire protection facilities in response to increased demand under the 2040 General Plan would be significant and unavoidable.

Impact 4.15-4: Require Expansion or Construction of New Public Libraries or Other Facilities to Meet New Demand or Address Overcrowding and Accessibility

As noted in Section 7.10, "Library Services," of the Background Report (Appendix B), the County Library System provides services to all residents and serves unincorporated areas and cities, or areas within cities, that are neither served by a city library nor within the boundaries of an independent library district. It operates 12 library branches located in Oxnard, Fillmore, Piru, Oak Park, Ojai, Oak View, Port Hueneme, and Ventura.

As described in Impact 4.15-1, the 2040 General Plan would be consistent with the established Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). However, the 2040 General Plan would allow for some low levels of future development, including 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase demand for library services.

Implementation of the 2040 General Plan would require that the County continue to provide access to library facilities and services throughout the county (Policies PFS-9.1 and PFS-9.5). Therefore, forecasted population growth that would be accommodated by future development under the 2040 General Plan could require expansion of existing facilities or construction of new facilities to meet increased demand or address overcrowding of adverse effects to accessibility. The construction of new or expanded library facilities could result in substantial adverse physical impacts. However, because of the programmatic nature of the general plan, project-specific impacts cannot be predicted at this time. It is possible that future development that could occur over the life of the 2040 General Plan could result in adverse effects to library and other facility impacts depending on their location.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded library facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded library facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded public facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded library facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded library facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded library facilities in response to increased demand under the 2040 General Plan would be significant and unavoidable.

Impact 4.15-5: Require Expansion or Construction of New Parks and Recreation Facilities and Services or Cause Substantial Physical Deterioration of Parks and Recreation Facilities Because of Overuse

As noted in Section 7.11, "Parks and Recreation Services," of the Background Report (Appendix B), there are approximately 640,000 acres of open space in the county that are managed by federal, State, County, special district, local, and nonprofit agencies. A portion of these open spaces are accessible to the public and offer a variety of recreational opportunities in different settings. The County owns 5,321 acres of parks, open space, and golf courses; as well as 23.25 miles of trails. A variety of recreational opportunities are also provided through special districts like the Conejo, Pleasant Valley, and Rancho Simi Recreation and Parks Districts. However, distance to open space and access vary throughout the county. Some residents of the plan area do not have access to open space/park resources within walking distance (0.5 mile) of their residence.

As described in Impact 4.15-1, the 2040 General Plan would be consistent with the established Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). In addition, the 2040 General Plan would allow for some low levels of future development, including 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development in these areas may be distant from existing parks and recreation facilities and may necessitate construction of new facilities.

The 2040 General Plan guides new urban growth to cities or parts of the plan area within the Existing Community area designation and encourages investment in facilities and infrastructure and services to improve quality of life. The 2040 General Plan includes the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county that are within the Existing Community or Urban area designation (Policy LU-1.1). The 2040 General Plan also requires the county to support development of parks and recreation facilities with areas designated as Existing Community, Area Plans, or Areas of Interest (Policy LU-12.1) and provides for the Parks and Recreation land use designation from the 2040 General Plan.

Implementation of the policies in the 2040 General Plan, described above, would require approved subdivisions not otherwise exempted under the County Subdivision Ordinance to provide new trails and/or parkland dedication, or equivalent in-lieu fees, based on a standard of 5 acres of local parkland per 1,000 population in accordance with the Quimby Act (Government Code, Section 66477) and County Quimby Ordinance. Any lands dedicated to meeting this requirement would be accessible to the general public. These policies apply to all Area Plans, and some Area Plans contain additional goals, policies, and/or programs to maintain adequate park and recreation facilities in these communities.

As described in Chapter 3, "Project Description," future development under the 2040 General Plan would accommodate forecasted population growth of 4,099 people between 2015 and 2040. The increase in population may result in physical deterioration of existing parks and recreation facilities if increased recreation demand results in overuse of parks and recreational facilities. Implementation of the 2040 General Plan Policies related to Parks in Recreation would require the expansion of existing park and recreation facilities or construction of new facilities in order to avoid physical deterioration from overuse and to maintain an acceptable ratio of parklands to population. The expansion of existing or the construction of new facilities in response to increased demand could result in adverse effects on the environment. The Ventura County Coastal Zoning Ordinance Section 8178-2.3, addressing development of recreational projects in Environmentally Sensitive Habitat Areas requires management programs to control the types, intensities, and locations of uses to preserve habitat resources to the maximum extent feasible. Compliance with this ordinance would lessen, but may not totally avoid, adverse effects of development.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded parks and recreation facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded parks and recreation facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded parks and recreation facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded parks and recreation facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR.

The adverse physical impacts associated with construction of new or expanded parks and recreation facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded parks and recreation facilities in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.