## REVISED DRAFT ENVIRONMENTAL IMPACT REPORT

For

## CAMARILLO SPRINGS GPA 2017-2

EIR 2020-10 • SCH #2019070514



Prepared by:



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EIR 2020-10 • SCH #2019070514

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# INTRODUCTION TO THE REVISED DRAFT EIR

This section describes the purpose of the Revised Draft Environmental Impact Report (EIR) and its role in the planning process for the proposed Camarillo Springs GPA 2017-2 project. This section includes a discussion of the intended use of the EIR, the public review process, and the Revised Draft EIR format and content. This section explains the City of Camarillo's rationale for preparing a Revised Draft EIR for the proposed project. This section also describes how comments received during the public review period of the original Draft EIR will be addressed in the Final EIR and that reviewers should limit their new comments to the sections of the Revised Draft EIR.

#### BACKGROUND OF THIS REVISED DRAFT EIR

On September 21, 2020, the City of Camarillo published the Draft EIR for the proposed Camarillo Springs GPA 2017-2 project (State Clearinghouse No. 2019070514). The proposed project site is the existing, privately-owned and operated Camarillo Springs Golf Course located at the base of the Conejo Mountains within the eastern area of the City of Camarillo. The site is located at 791 Camarillo Springs Road and includes Assessor's Parcel Numbers (APNs) 234-0-040-420, 234-0-040-595, 234-0-040-740, 234-0-040-750, 234-0-040-760, 234-0-040-770, 234-0-181-115, 234-0-201-045, 234-0-201-055. The site is generally bound by Ridge View Street to the north and is generally east and south of Ridge View Street's intersection with Adohr Lane.

The golf course was approved for development by the City of Camarillo in 1970 and has been developed and operational for more than 45 years. The property is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures. The golf course is open for public use and play, as well as tournaments, and its hours of operation are from 6:00 a.m. until sundown, seven days per week. The property is designated as Public/Quasi-Public in the City of Camarillo General Plan and is zoned RE (Rural Residential) and RE-1 Acre.

NUWI Camarillo, LLC is requesting approval from the City of Camarillo to amend the General Plan Land Use Element to change the land use designation for an approximately 31-acre portion of the larger 182-acre project site from Public/Quasi-Public to Low-Medium Density Residential (5.1 - 10 dwelling units per acre) and change the zoning of this area from RE to RPD-8U (Residential Planned Development – 8 units per acre maximum). The area proposed for the General Plan Amendment (GPA) and change of zone is within one lot (the 85.59-acre APN 234-0-040-595) and is specifically located south of Ridge View Street and west of the existing golf course driving range. The applicant is also requesting approval of a Tentative Tract Map (TT-6016) to subdivide the property for the development of up to 248 new age-

restricted (55+) residential units and a Residential Planned Development (RPD-204) permit for the development of 248 age-restricted (55+) single family detached dwelling units. The development would include a private recreation center and open spaces that include two pocket parks and walking trail connectivity to the surrounding community.

Development of the residential area would require the temporary closure and reconfiguration of the golf course. The applicant is requesting to reconfigure the golf course into 12 holes instead of the current 18-hole layout under Special Use Permit Modification (SUP-6M3). The golf course clubhouse would be renovated and enhanced within the existing building footprint. Other improvements proposed for the golf course include a renovated driving range in the same location as the existing driving range and additional open spaces including a new neighborhood park, trails, a dog park, and event spaces, all of which would be open and available for public use.

The project applicant has also submitted a Conditional Letter of Map Revision (CLOMR) to the Federal Emergency Management Agency (FEMA) to modify the existing Flood Insurance Rate Map (FIRM) floodplain map in order to remove 154 existing residences located offsite within the Camarillo Springs community from the 100-year Special Flood Hazard Area (SFHA) and to facilitate residential development within the existing golf course. The area of the existing course in the southwest portion of the project site (Golf Course – South Area) will be excavated and modified to generate fill for the creation of the approximate 31-acre residential pad. A continuous basin would be provided in the golf course – south area in order to capture the water that would normally inundate the northern part of the course, where the proposed senior residential development is located, during heavy storm events.

In accordance with § 21091 of the California Environmental Quality Act (CEQA), the Draft EIR was circulated for public review and comment for 45 days from September 21, 2020 through November 5, 2020. During this time period, public agencies, organizations, and the public in general were afforded the opportunity to review the Draft EIR and submit written comments regarding the Draft EIR and the proposed project in accordance with Section 15087 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines).

Subsequent to the public review period, the City initiated a third party review of the project Master Drainage Plan and Floodplain Analysis as part of its effort to address comments that were submitted on the Draft EIR. Key issues identified during the initial third party review included the following:

- The need to use previously-accepted runoff methodology estimates to account for drainage-related issues associated with recorded fires, flooding, hillside instability, and debris flows within the Camarillo Springs areas.
- The need to update the debris production analysis.
- The need to provide expanded modeling to include the Camarillo Springs Creek Watershed.

- The need to map flood hazards due to historical fire and flood events and potential systems blockages or system failures.
- The need to perform several additional event analyses.
- The need to provide an unobstructed emergency spillway and flow path.

As a result of the third party review, the magnitude of the incoming 100-year peak flow at Camarillo Springs Road was nearly doubled from 1,151 cubic feet per second (cfs) to 2,250 cfs, with an 18% increase in the 100-year flood hydrograph volume. The increase in the incoming runoff and hydrology resulted in a substantially larger drainage system required for the proposed development. In response to the third party review, the project applicant chose to revise the Drainage Plan and Floodplain Analysis. For example, the drainage system was revised to include four additional 66-inch pipe culverts at Camarillo Springs Road, a larger single 12.5′x6.5′ bypass box culvert, new double 12.5′x6.5′ box conduits bypassing the reconfigured lake/pond along the southern edge of the proposed residential development, and a breach-resistant floodwall or levee embankment which is proposed to completely separate the upstream runoff, preventing it from entering the reconfigured lake/pond. The proposed Tentative Tract Map was subsequently modified to reflect the changes to the revised Master Drainage Plan and Floodplain Analysis.

Subsequent third party reviews identified the following key issues:

- The proposed fill separating the main stem of Conejo Creek and the golf course is intended to remove homes from the 100-year FEMA SFHA. Therefore, it must be designed as a levee pursuant to Title 44, Chapter 1, Section 59.1 and Title 44, Chapter 1, Section 65.10 of the Code of Federal Regulations (44 CFR 59.1 and 44 CFR 65.10).
- The reconfigured lake/pond fill embankment still needs an unobstructed emergency spillway and flow path to comply with Camarillo Municipal Code Section 16.34.120(E) for preventing or regulating the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.
- The embankment or floodwall between the West Basin and the lake/pond is proposed to separate the upstream Camarillo Springs Creek flows and the local flows adjacent to the lake. A full design of the embankment or floodwall, including soils or geotechnical engineering analysis, has not been provided.
- Discharges and velocities to the channel west of Margarita Avenue increase due to the added conveyance caused by the triple box culverts, the Ridge View Street storm drain, and the two 48-inch reconfigured lake/pond drain pipes. A complete energy dissipator and outlet structure design at Margarita Avenue to support a reduction in flow velocities from 9 feet per second (fps) to 3 fps has not been provided.

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- The lake outlet pipes will require mechanical flap gates to prevent backflow into the lake from Conejo Creek. An operation & maintenance manual is required pursuant to 44 CFR 65.10 and Camarillo Municipal Code Section 16.34.330.
- A Ventura County Watershed Protection District (VCWPD) watercourse permit and/or concurrence is required due to the fill embankment, outlet works, and energy dissipator being within the Conejo Creek floodplain and floodway.
- Document each failure analysis and results in the Master Plan Plan report and include the multi-day 100-year analysis.
- Provide a combined 500-year storm analysis for Conejo Creek and CSCW.

#### REQUIREMENTS FOR RECIRCULATION OF A DRAFT EIR

Pursuant to Section 15088.5 of the State CEQA Guidelines, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review but before certification. As used in this Section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

#### CHANGES REQUIRING RECIRCULATION OF THE DRAFT EIR

The revised Master Drainage Plan and Floodplain Analysis, and revised Tentative Tract Map for the project represent significant new information that the public has not had the opportunity to review and comment upon. In addition, the new and revised information associated with the revised Master Drainage Plan and Floodplain Analysis, and revised Tentative Tract Map have resulted in changes to the Executive Summary, Environmental Setting, Project Description, Air Quality, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, and Alternatives to the Proposed Project sections of the original Draft EIR.

#### SCOPE AND CONTENT OF THE REVISED DRAFT EIR

Pursuant to Section 15088.5(c) of the State CEQA Guidelines, if the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified. As discussed above, the new information associated with the revised Master Drainage Plan and

Floodplain Analysis, and revised Tentative Tract Map have resulted in changes to the Executive Summary, Environmental Setting, Project Description, Air Quality, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, and Alternatives to the Proposed Project sections of the original Draft EIR. The City has also elected to update information in the Hazards and Hazardous Materials, and Wildfire sections of the original Draft EIR. The changes associated with each section of the Revised Draft EIR are as follows:

**Executive Summary**: This section has been prepared to summarize the conclusions of the other sections of the Revised Draft EIR.

**Environmental Setting**: This section has been revised to describe historical natural hazards in the Camarillo Springs area and to identify a new related project proposed within the Camarillo Springs Golf Course property.

**Project Description**: This section has been revised to reflect the modified Tentative Tract Map and the changes to the revised Master Drainage Plan.

Air Quality: This section has been revised to reflect the increased amount of soil that would be graded to reshape the golf course and create the building pad area as a result of the changes to the proposed Master Drainage Plan. Between the time that the original Draft EIR was prepared and the Revised Draft EIR was prepared, the California Emissions Estimator Model (CalEEMod) that was used to calculate construction-related and operational emissions was updated to reflect new emissions factors and other default information for Ventura County. The current version of CalEEMod has been used to quantify the estimated emissions for the proposed project.

**Energy**: This section has been revised to reflect the increased amount of soil that would be graded to reshape the golf course and create the building pad area as a result of the changes to the proposed Master Drainage Plan. The current version of CalEEMod has been used to quantify the estimated energy demand for the proposed project.

**Greenhouse Gas Emissions**: This section has been revised to reflect the increased amount of soil that would be graded to reshape the golf course and create the building pad area as a result of the changes to the proposed Master Drainage Plan. The current version of CalEEMod has been used to quantify the estimated emissions for the proposed project.

**Hazards and Hazardous Materials**: This section has been revised to reflect an Updated Emergency Evacuation Analysis prepared for the proposed project as well as additional text changes directed by City staff.

**Hydrology and Water Quality**: This section has been revised to reflect the changes to the revised Master Drainage Plan and the final comments and observations associated with the City's third party review of the revised Master Drainage Report and Floodplain Analysis.

**Wildfire**: This section has been revised to reflect include the current wildfire Fire Hazard Severity Zones map as well as additional text directed by City staff.

**Alternatives to the Proposed Project**: This section has been revised based upon the changes to the proposed Master Drainage Plan.

Each of the revised sections retains its original page numbering from the original Draft EIR.

#### PUBLIC REVIEW OF THE REVISED DRAFT EIR

As with the original Draft EIR, the Revised Draft EIR is being circulated for a 45-day public review period. A copy of the Revised Draft EIR will be made available for public review on the City's website (http://www.cityofcamarillo.org/departments/community\_development/index.php) and at the counter for the City of Camarillo Department of Community Development at the address listed below.

During this review period, public agencies and interested organizations and individuals are encouraged to provide written comments addressing their concerns regarding the adequacy and completeness of the Revised Draft EIR. When providing written comments on the subject matter of the Revised Draft EIR, the readers are referred to Section 15204(a) of the State CEQA Guidelines, which states:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Pursuant to Section 15088.5(f)(2) of the State CEQA Guidelines, when the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were

revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

In the case of this project, all of the comments that were submitted to the City in regard to the original Draft EIR have been retained. The comments that pertain to the sections of the original Draft EIR that have not been revised and included in the Revised Draft EIR will be responded to in the Final EIR. Therefore, the City formally advises and requests that readers of this Revised Draft EIR should limit their comments to the sections of the Draft EIR that have been revised and recirculated in this Revised Draft EIR.

All comments or questions regarding the Revised Draft EIR should be addressed to:

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Following the close of the Revised Draft EIR public review period and receipt of all new written comments thereon, the City of Camarillo will prepare a Final EIR. The Final EIR will provide written responses to the written comments received by the City during the review periods for the original Draft EIR and the Revised Draft EIR as described above as well as any related changes to the EIR itself, and a Mitigation Monitoring and Reporting Program. Agency representatives and members of the public will also have additional opportunities to participate in the review of the proposed project through attendance at the public hearings before the City of Camarillo Planning Commission and City Council.

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### **EXECUTIVE SUMMARY**

This summary is intended to highlight the major areas of importance in the environmental analysis of the proposed project. This summary includes a discussion of the location of the project site, project objectives, and the project description. A summary of the potential impacts that could occur as a result of the proposed project, recommended mitigation measures, and the level of significance after mitigation is included in this section. A summary of project alternatives is also provided.

#### PROJECT LOCATION

The proposed project site is the Camarillo Springs Golf Course located at 791 Camarillo Springs Road in the eastern area of the City of Camarillo. The Camarillo Springs area is an isolated community within the City of Camarillo. There are 967 residential units, 73,390 square feet of business center (office) space, 21,400 square feet of commercial retail space, and the 18-hole golf course within the Camarillo Springs area. The property is largely bordered by existing residential developments and open space.

The golf course was approved for development by the City of Camarillo in 1970 and has been developed and operational for more than 45 years. The property is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures. The golf course is open for public use and play, as well as tournaments, and its hours of operation are from 6:00 a.m. until sundown, seven days per week.

#### **PROJECT OBJECTIVES**

The primary objectives for project are:

- Assist the City in implementing the General Plan's housing goals by increasing the City's housing stock
  and diversifying the range of housing opportunities for a special needs population (seniors) in an area
  adjacent to existing, established residential communities.
- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.
- Provide a mix of high-quality housing to accommodate the City's growing senior population.

- Renovate an existing privately-owned golf course to address changing demands for golf alongside interrelated recreational amenities, thereby supporting the City's General Plan Recreation Element goals and policies.
- Develop a residential planned development that will make available a variety of housing designs and facilitate the use of innovative approaches to housing design thereby supporting the City's General Plan Housing Element goals and policies.
- Create opportunities for future and existing residents to socialize, dine, and recreate through the preservation and enhancement of golf and associated amenities, including a renovated clubhouse.
- Design a residential infill community that respects the privacy of adjacent residents through the utilization of setbacks and landscaped buffers.
- Enhance neighborhood walkability and connect existing and proposed residential communities to parks
  and recreational amenities through a network of trails, internal walkways, and paseos to be used by
  existing and proposed residents.
- Utilize sustainable design measures to reduce water usage, lower residential energy consumption, maximize energy saving features, and protect natural resources consistent with the City's land use goals and policies.
- Implement timely public facilities such as utilities, roads, and recreational amenities as development occurs within existing service areas without burden or cost to existing residents, visitors or the City of Camarillo.

#### PROPOSED PROJECT

The project applicant is requesting approval from the City of Camarillo to amend the General Plan Land Use Element to change the land use designation for a 31-acre portion of the larger 182-acre project site to Low-Medium Density Residential (5.1 - 10 dwelling units per acre) and change the zoning of this 31-acre portion from Rural Exclusive (RE) to RPD-8U (Residential Planned Development – 8 units per acre maximum). The applicant is also requesting approval of a Tentative Tract Map (TT-6016) to subdivide the property for the development of up to 248 new age-restricted (55+) single family, detached residential units and a Residential Planned Development (RPD-204) permit for the development of 248 age-restricted (55+) single family detached dwelling units. The residential component of the proposed project would be developed to a density of approximately eight dwelling units per acre and would be gated. The residential development would include a private recreation center and open spaces that include two pocket parks and walking trail connectivity to the surrounding community.

Development of the residential area would require a reconfiguration and update of the existing golf course, proposed under Special Use Permit Modification SUP-6M(3). All existing cart paths, existing ponds, and other golf features (fairways, tees, greens, etc.) would be removed and redesigned as a 12-hole golf course. The golf course clubhouse would be renovated and enhanced within the existing building footprint. The driving range and surrounding area would be renovated. The area to the east of the driving range would include a neighborhood park, walking trails, a dog park, and event spaces, all of which would be open and available for public use. The neighborhood park would be approximately 6.3 acres and the dog park would be approximately 1.3 acres. The existing maintenance buildings at the northwest edge of the property would remain in their existing building footprints.

#### **TOPICS OF KNOWN CONCERN**

To determine the environmental issues that should be addressed in the Draft EIR, City of Camarillo Department of Community Development conducted a preliminary evaluation of the potential environmental impacts that could occur with implementation of the proposed project. Based on this review, the City concluded that the project could have potentially significant impacts associated with the following environmental issues:

 Aesthetics and Scenic Air Quality Biological Resources Resources • Cultural Resources and Tribal • Geology and Soils Energy Cultural Resources Greenhouse Gas Emissions • Hazards and Hazardous Hydrology and Water Quality Materials • Land Use and Planning Noise and Vibration • Population and Housing • Public Services and Recreation • Transportation • Utilities and Service Systems

A summary of the potential significant environmental impacts of the project is provided in Table 2-1. As shown, the proposed project would result in a significant and unavoidable environmental impact regarding hydrology and water quality.

#### PROJECT ALTERNATIVES

• Wildfire

This EIR also considers a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 151216(f) of the State CEQA Guidelines. The alternatives analyzed in this EIR are as follows:

#### No Project Alternative

Under the No Project Alternative, the proposed project would not be constructed and the site would remain as a golf course. Under this scenario, none of the impacts evaluated in this EIR would occur. The golf course could continue to be operated in its current condition, it could be renovated or re-designed, or it could close.

A No Project alternative would not meet any of the objectives for the proposed project. The No Project Alternative would not abate existing flood hazards for current residents located immediately south of the project site. No new senior housing would be provided. No development in furtherance of the City's Housing Element would be taken, and no trails would be constructed or connected.

It is possible that a subsequent applicant could renovate, redesign, or redevelop the golf course within the existing limits of the golf course or expand the golf course within the existing property boundaries. It is also possible that another application could be submitted to the City of Camarillo in the near future requesting approval to redevelop the site with uses to the extent permitted by the existing RE and RE-1 Acre zones. This could include agricultural uses, hospitals, day care facilities, elementary, junior high, and high schools, colleges and boarding schools, farm animals, boarding and care of horses, commercial stables and riding academies, movie sets, public parks, playgrounds, and athletic fields, and cemeteries, crematoriums, and mausoleums. Therefore, the No Project Alternative would not preclude development of the project site; it may instead temporarily delay to a later date the redevelopment of the site with a potential range of new uses. Any such development would need to raise the proposed building pads above the 100-year floodplain and provide a corresponding amount of Conejo Creek floodplain storage. This may or may not include provisions to remove the existing residences from the 100-year floodplain. Redevelopment consistent with the underlying existing zoning could create greater impacts associated with transportation, air quality, greenhouse gas emissions, noise, public services, and utilities if the site is developed with uses that are more intensive than the proposed project (e.g., an educational institution, a hospital, public agency offices, active athletic fields, etc.). If such development eliminates the golf course altogether, such development would likely result in greater biological resources impacts than the proposed project, which retains a substantial portion of the golf course.

It is speculative and beyond the scope of this EIR to evaluate the potential development of the site under every use that is permitted in the RE and RE-1 Acre zones. Therefore, for purposes of this analysis, it is assumed that the existing golf course would continue to operate in its existing condition, which would result in fewer impacts than the proposed project. The No Project Alternative would not result in potential significant flooding risks to the existing homes and proposed development, and it also would not remove any of the existing residences in the Camarillo Springs area from the 100-year floodplain.

#### No Conejo Creek Flood Protection Alternative

This alternative would include the development of the proposed 248 age-restricted (55+) single family detached dwelling units along with the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative may reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

Development of the No Conejo Creek Flood Protection Alternative would meet most of the primary objectives for the project. However, this alternative would not meet the following objectives for the project:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

#### **Reduced Density Alternative**

The Reduced Density Alternative would involve a GPA to change the land use designation for the same 31-acre portion of the property to Low Density Residential (5 dwelling units per acre max). This would result in the development of up to 150 new age-restricted (55+) residential units. This alternative would include the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative may reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

Development of the Reduced Density Alternative could meet most of the primary objectives for the project. However, this alternative would provide substantially fewer dwelling units than the proposed project and would not meet the following primary objectives:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

#### **Reduced Intensity Alternative**

This alternative would develop new residential units developed at the same Low-Medium Density Residential (5.1 - 10 dwelling units per acre) designation as the proposed project but would cover an area of 15 acres rather than the 31 acres of the proposed project. This alternative would result in the development of up to 150 new age-restricted (55+) residential units. This alternative would include the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative would reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

Development of the Reduced Intensity Alternative would meet most of the primary objectives for the project. However, this alternative would provide substantially fewer dwelling units than the proposed project and would not meet the following primary objectives:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Aesthetics and Scenic Resources		
<b>Scenic Vistas</b> : Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.	No mitigation is required or recommended.	Less than significant impact.
Damage Scenic Resources Within a State Scenic Highway: Implementation of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Implementation of the proposed project would also not substantially alter or damage a scenic resource that is visible from a City scenic corridor.	No mitigation is required or recommended.	Less than significant impact.
Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality: Implementation of the proposed project would not conflict with applicable zoning or other regulations governing scenic quality.	No mitigation is required or recommended.	Less than significant impact.
Light and Glare: Implementation of the proposed project could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	ASR-1 To avoid potential significant impacts to adjacent roadways and nearby residences, the project developer shall include in contract specifications that temporary construction lighting shall be shielded from the adjacent roadways, native habitat, and adjacent residences, including any new residences constructed as part of the proposed project.	Less than significant impact.
Air Quality		
Consistency with the 2022 AQMP: Implementation of the proposed project would not conflict with or obstruct implementation of the 2022 AQMP.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Cumulatively Considerable Increases in Emissions: Temporary, construction-related daily emissions generated during the project grading phase would exceed 25 pounds per day; therefore, as recommended by the Ventura County Air Pollution Control District (VCAPCD), this is identified as potentially significant impact. Mitigation is identified to reduce these emissions to the maximum extent feasible. The average daily emissions associated with project operational activities would not exceed the thresholds of significance recommended by the VCAPCD.	<ul> <li>AQ-1 As recommended by the VCAPCD's Air Quality Assessment Guidelines, the project developer shall include in construction contracts the following control measures:</li> <li>• Maintain equipment engines in good condition and in proper tune per manufacturer's specifications.</li> <li>• Maintain all construction equipment in good condition and in proper tune in accordance with manufacturer's specifications.</li> <li>• Limit truck and equipment idling time to five minutes or less.</li> <li>• Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October).</li> <li>• Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent feasible.</li> <li>• Heavy equipment used for grading and utilities installation shall use engines with a minimum diesel rating of Tier 3 with diesel oxidation catalysts, level 3 diesel particulate filters that reduce particulate matter by at least 85 percent, and meet the latest ARB best available control technology.</li> </ul>	Less than significant impact.
Exposure of Sensitive Receptors to Substantial Pollutant Concentrations: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of carbon monoxide. However, implementation of the proposed project could expose sensitive receptors to substantial pollutant concentrations of construction-related fugitive dust and toxic air contaminants. Mitigation is identified to reduce these impacts to less than significant levels.	<ul> <li>AQ-2 All project contractors must implement fugitive dust control measures throughout all phases of construction. The project developer shall include in construction contracts the following control measures:</li> <li>• Minimize the area disturbed on a daily basis by clearing, grading, earthmoving, and/or excavation operations.</li> <li>• Pre-grading/excavation activities must include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities.</li> <li>• All trucks must be required to cover their loads as required by California Vehicle Code §23114.</li> </ul>	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	<ul> <li>All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, must be treated to prevent fugitive dust. Treatment must include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering must be done as often as necessary.</li> <li>Graded and/or excavated inactive areas of the construction site must be monitored by a City-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, must be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area</li> </ul>	
	should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.	
	• Signs must be posted on-site limiting on-site traffic to 15 miles per hour or less.	
	<ul> <li>During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations must be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor must use his/her discretion in conjunction with the VCAPCD is determining when winds are excessive.</li> </ul>	
	<ul> <li>Adjacent streets and roads must be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.</li> </ul>	
	<ul> <li>Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.</li> </ul>	
<b>Objectionable Odors</b> : Implementation of the proposed project would not result in other emissions that create objectionable odors adversely affecting a substantial number of people.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES	
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Environmental Impacts	Mitigation Measures	Residual Impacts
	Biological Resources	
Candidate, Sensitive, and Special Status Species: Implementation of the proposed project could have a potentially significant effect, either directly or through habitat modifications, on a 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 US Fish and Wildlife Service.	BIO-1 Southwestern Pond Turtle: A qualified biologist shall prepare a Southwestern Pond Turtle Avoidance and Minimization Plan that shall include the following main components: 1) Worker Education Program; 2) exclusionary fencing; 3) biological/fence monitoring; and 4) relocation measures. The Avoidance and Minimization Plan shall be submitted to the City of Camarillo and CDFW for approval.  Further, and consistent with the approved Avoidance and Minimization Plan, southwestern pond turtle within the proposed project impact area shall be relocated to approved relocation areas, which would potentially include Conejo Creek. Individuals shall be captured by hand or dipnet and immediately relocated outside of the project impact area.  Exclusionary fencing/silt fencing shall be installed around all water bodies proposed to be impacted prior to draining or ground disturbing activities. This will facilitate the effective capture of turtles and prevent turtles from entering the work zone. Exclusionary fencing shall also be installed around all ponds/waterways (with a set back of the exclusionary fence to allow for basking on the bank) to be avoided in order to prevent turtles from accessing the work zone. This would include the installation of fencing along the eastern bank of Conejo Creek where the haul road is located and its unnamed tributary that traverses onto the northern portion of the project site. A qualified biologist shall monitor fence installation and will periodically inspect the fencing during construction.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	BIO-2 Least Bell's Vireo: Clearing and grubbing of potential least Bell's vireo habitat should occur outside of the least Bell's vireo nesting season (between September 16 and March 14). If clearing and grubbing activities will occur during the least Bell's vireo nesting season (between March 15 and September 15), then a qualified biologist shall monitor such activities until all suitable habitat has been removed.	
	In addition, a qualified biologist shall conduct a Worker Environmental Program prior to construction activities commencing.	
	Finally, if least Bells' vireo individuals or active nests are observed within a 300-foot buffer between the occupied habitat and construction activities during the construction monitoring, then construction activities in the area shall be halted/postponed, and the USFWS shall be contacted and informed of the finding immediately. The 300-foot buffer distance will be approved by the USFWS. Construction activities shall not commence within the approved buffer until the individuals have left the area and the nest is vacated and juveniles have fledged (if present) and there is no evidence of a second attempt at nesting, as determined by the biologist. Additional mitigation measures including the installation of sound dampening barriers (e.g., sound wall) may be incorporated with prior approval from the USFWS in order to allow construction activities to occur within 300 feet of least Bell's vireo individuals.	
	BIO-3 <b>Nesting Birds</b> : To the extent possible, the project applicant shall schedule all vegetation removal and grading activities during the non-breeding season (i.e., September 1 to January 31) to avoid impacts on active nests for common and special status birds. If project timing requires that vegetation clearing or grading occur between February 1 and August 31, the project applicant shall retain a qualified biologist (one with experience conducting nesting bird surveys) to conduct a pre-construction survey for nesting birds and raptors. A pre-construction survey shall be conducted by the qualified Biologist within 72 hours prior to vegetation clearing or the initiation of work during the breeding season. The pre-construction nesting bird survey area shall include the project site (i.e., disturbance footprint) plus a 250-foot buffer to search for nesting birds and a 500-foot buffer to search for nesting raptors. If no active nests are found, no further mitigation would be required.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	If an active nest is observed during the survey, the Biologist shall delineate an appropriate buffer to protect the nest. A protective buffer zone (25 feet to 500 feet for nesting birds, 300 feet to 500 feet for nesting raptors) shall be used to protect nesting birds and nesting raptors. The size of the buffer shall be established at the discretion of the Biologist based on site topography, existing disturbance, status of the species, sensitivity of the individuals (established by observing the individuals at the nest), and the type of construction activity. No construction activities shall be allowed in the designated buffer until the Biologist determines that nesting activity has ended. Encroachment into the buffer area around a known nest will only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction may proceed within the buffer once the Biologist determines that nesting activity has ceased (i.e., fledglings have left the nest or the nest has failed). The designated buffer will be clearly marked in the field and will be mapped as Environmentally Sensitive Areas (ESAs) on construction plans.	
	BIO-4 Roosting Bats: A final focused survey shall be conducted at the project site to determine the species of bat roosting at the project site during the maternity season (April 1 through August 31). If any potential maternity colonies are identified within the project impact area (including tree roosting bat species), those locations shall be mapped and a protective buffer shall be delineated by a qualified bat biologist. A protective buffer zone (minimum of 50 feet) shall be used to protect the potentially active maternity roost until the end of maternity season. The size of the buffer shall be established at the discretion of the qualified bat biologist based on site topography, existing disturbance, status of the species, and the type of construction activity. No construction activities shall be allowed in the designated buffer until end of maternity season, unless the qualified bat biologist can determine bats are no longer roosting within potential maternity roost.	

TABLE 2-1.	- SUMMA	ARY OF PRO	OJECT IMPA	CTS AND	MITIGATION	MEASURES
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Environmental Impacts	Mitigation Measures	Residual Impacts
	No more than 90 days prior to scheduled vegetation/structure removal, a qualified biologist shall conduct pre-construction surveys to identify those trees and/or structures proposed for disturbance that could provide day roosting habitat, maternity roosting habitat, or hibernacula. If day roosts, maternity roosts and/or hibernacula are present, the project developer shall implement appropriate measures to address temporary avoidance and removal, as applicable. Pre-construction surveys shall be repeated as necessary if the proposed vegetation removal will be phased over time.	
	If a roost must be removed or temporarily excluded, a project-specific Bat Roost Eviction and Mitigation Plan shall be prepared to include the following main components: 1) timing of construction activities/vegetation removal; 2) construction related avoidance and minimization measures; 3) pre-construction surveys; 4) worker education program; 5) biological monitoring of vegetation removal within potential roost locations; and 6) exclusion/roost replacement measures.	
	Occupied bat roosts shall be removed in a manner to minimize direct impact to bats. The procedures to remove bat roosts shall be detailed in a Bat Protection Plan but shall include a multi-step process to dismantle the roosts allowing the bats to exit unharmed prior to the final removal of the roost. Non-maternity day roosts may be removed at any time of the year. Maternity roosts shall be removed outside of the Maternity Season (April 1 through August 31). Hibernacula shall be removed outside of when bats are using the roosts for hibernation. If it is not feasible to remove maternity roosts and/or hibernacula during the appropriate timeframes, then the roosts will be temporarily avoided, and measures shall be implemented to minimize impacts to avoided roosts. The minimization measures shall be detailed in the Bat Protection Plan.	
	In addition, a biologist shall place flagging and signage around roosts prior to the initial ground disturbance activities to prevent the accidental removal of the roost tree/structure. Flagging and signage shall be maintained as long as ground disturbance activities occur within 300 feet of roosts. The biologist shall periodically monitor the construction activities within the buffer area to ensure that indirect effects are being minimized. The idling of construction equipment shall be minimized within the 300-foot buffer area. As feasible, construction equipment should not be staged within the buffer area.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	BIO-5 Mountain Lion: The project applicant shall include in purchase and tenant contracts the requirement that anticoagulant rodenticide shall not be used on any portion of project site during the operational life of the project. Anticoagulant rodenticides are typically used to control rodent populations, however, they have resulted in adversely affecting mountain lion populations and shall not be used in association with project activities unless new application methods are developed and subsequently proven to have no direct or secondary exposure effect on carnivore species, including mountain lion.	
	BIO-6 Landscape Plan: The project applicant shall retain a qualified biologist (one with botanical expertise) to review and approve the final landscaping plan to ensure that the project does not include planting invasive species that would potentially degrade the quality of the surrounding sensitive associations of ashy buckwheat scrub, coast prickly pear scrub, lemonade berry scrub, and arroyo willow thicket. The biologist shall review the proposed plant pallet to ensure that it does not contain any invasive plant species (i.e., those on the California Invasive Plant Council's [Cal-IPC's] Invasive Plant Inventory rated as Moderate or High). Landscaping installed at the project site shall include only species on the approved plant palette. No invasive plant species shall be incorporated into any future change to the landscaping plan or subsequent landscaping throughout the operational life of the project.	
	BIO-7 <b>Nighttime Construction</b> : The project developer shall include in contract specifications that no construction activities shall occur at night (beginning 30 minutes before sunset and ending at sunrise).	
	BIO-8 <b>Trash and Food Waste</b> : The project developer shall include in contract specifications that all trash and food waste associated with construction or construction personnel shall be disposed of in sealed containers. These containers shall be emptied daily or prior to reaching their capacity. Any trash container observed to be attracting wildlife (ravens, rats, coyotes, etc.) shall be replaced with a more secure container and emptied at a higher frequency.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	BIO-9 <b>Project Limits</b> : The project developer shall include in contract specifications that all project limits shall be staked, flagged, or fenced to clearly delineate the boundaries of the project construction area. All ingress and egress routes shall be identified prior finalizing the project limits and prior to conducting required preconstruction biological surveys. No construction activities (including staging, stockpiling, or vehicle and equipment access or turn-arounds) shall occur in unpaved areas outside of the identified project limits. No fencing shall be installed between the undeveloped hill southwest of Margarita Avenue and the undeveloped open space south of Irena Avenue. A minimum of 200 feet shall remain passable by wildlife between these two areas so connectivity may remain between these two open space areas.	
	BIO-10 <b>Introduction of Invasive Plants</b> : The project developer shall include in contract specifications that all construction vehicles and heavy equipment shall be washed (including treads, wheels, and undercarriage) prior to delivery to the project site to minimize weed seeds entering the construction area via vehicles. Additionally, any straw wattles used for erosion control shall be certified as weed-free.	
	BIO-11 Removal of Existing Invasive Plants: The project developer shall include in contract specifications that existing invasive plant species (such as giant reed) located at the project site to be removed during construction shall be removed using best management practices that contain and properly dispose of the species' seeds and plant materials (which may reproduce asexually). Transport of any invasive plant material offsite shall be stored in securely covered containers or vehicles and disposed of at facilities that shall properly eliminate the ability of these materials to grow or colonize new areas.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Riparian Habitat and Other Sensitive Natural Communities: Implementation of the proposed project could have a potentially significant effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.	BIO-12 For all features identified in the project's jurisdictional delineation as jurisdictional that cannot be avoided, the project applicant shall obtain permits from the respective agencies (USACE, CDFW, and the RWQCB) prior to the initiation of construction activities. These permits include a CWA section 404 permit from the USACE Section, a CWA section 401 water quality certification from the RWQCB, and CDFW Section 1602 Notification of Lake or Streambed Alteration. If any Threatened and/or Endangered species are determined to occur within these areas, the Section 404 permit would involve a Section 7 Consultation between the USACE and US Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act.	
	The project applicant shall implement and comply with all measures required by the jurisdictional permits. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies (USACE, CDFW, and the RWQCB) during the regulatory permitting process. Potential mitigation options shall include one or both of the following: (1) payment to a resource agency-approved mitigation bank or regional riparian enhancement program (e.g., invasive vegetation or wildlife species removal); and/or (2) establishment of riparian habitat (on site or off site) at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. This will ensure no net loss of jurisdictional resources and that mitigation areas shall be equivalent or higher quality habitat value than those impacted.	

TABLE 2-1.	- SUMMA	ARY OF PRO	OJECT IMPA	CTS AND	MITIGATION	MEASURES
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Environmental Impacts	Mitigation Measures	Residual Impacts
	If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the applicant shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the replacement of impacted jurisdictional resources. If a riparian habitat establishment program is required, the project applicant shall (1) develop a habitat mitigation and monitoring plan (HMMP) in conformance with the USACE 2015 Guidelines; (2) submit the HMMP to the resource agencies for review; and (3) obtain resource agency approval of the HMMP, prior to the initiation of any construction-related activities. The HMMP shall be prepared by a qualified Restoration Ecologist and shall be implemented by a qualified Restoration Contractor (as defined below) under the supervision of the Restoration Ecologist. The project applicant shall be responsible for implementing the HMMP and ensuring that the mitigation program achieves the approved performance criteria. The project applicant shall implement the HMMP per its specified requirements, materials, methods, and performance criteria. The HMMP shall include the following items:	
	• Responsibilities and Qualifications. The responsibilities and qualifications of the applicant, ecological specialists, and restoration (landscape) contracting personnel who will implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long- term monitoring and maintenance of California native habitat mitigation/restoration programs, implemented under USACE, CDFW, and RWQCB permit conditions. A successful program shall be defined as one that has been signed off on by the resource agencies.	
	• <b>Performance Criteria</b> . Mitigation performance criteria to be specified in the HMMP shall conform to the resource agency permit conditions. The HMMP shall state that the use of the mitigation site by special status plant or wildlife species, though not a requirement for site success, would be regarded by the resource agencies as a significant factor in considering eligibility for program sign-off.	
	• <b>Site Selection</b> . The mitigation site(s) shall be determined in coordination with the resource agencies. The site(s) shall be in dedicated open space areas and shall be contiguous with other natural open space areas. The soils, hydrology/hydraulics, and other physical characteristics of the potential mitigation sites shall be analyzed to ensure that proper conditions exist for the establishment of riparian habitat.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	• Seed Materials Procurement. At least one year prior to mitigation implementation, the Project Applicant or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 20 miles, and within the same watershed, as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized per habitat area, in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off- site habitat areas (lowest priority), assuming availability of seed species in multiple locations.	
	• Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species and biological monitoring that are required to avoid adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these tasks due to sensitive wildlife conditions on the mitigation site (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).	
	• Site Preparation and Plant Materials Installation. Mitigation site preparation shall include all of the following: (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not 'photo-degradable' plastic mesh] fiber roll); (f) application of salvaged native plant materials (i.e., coarse woody debris), as available and supervised by a biological monitor; (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)—including specification of approved herbicides; (i) planting of container plant and cutting species; and (j) seed mix application.	
	• <b>Schedule</b> . An implementation schedule shall be developed that includes planting and seeding to occur in the fall and winter (i.e., between November 1 and January 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below) for five years or until the mitigation program achieves the approved performance criteria.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Wetlands: Implementation of the proposed project could have a potentially significant effect on State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	Mitigation measure BIO-12 is applicable to this impact.	Less than significant impact.
Wildlife Movement and Habitat Fragmentation: Implementation of the proposed project could interfere with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	BIO-13 No permanent fencing impermeable to wildlife shall be installed on the southern portion of the project site (southwest of Margarita Street) that has potential to limit wildlife movement across the site to adjacent, undeveloped areas. Examples of impermeable fencing include electric, chain link, welded wire, mesh fence (plastic or wire material), wrought iron, and any fencing with a solid surface such as wood panel fencing or cinderblock).	Less than significant impact.
Local Ordinances and Policies Protecting Biological Resources: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	No mitigation is required or recommended.	No impact.
Conservation Plans: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	No mitigation is required or recommended.	No impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts			
Cultural Resources and Tribal Cultural Resources					
<b>Historical Resources:</b> Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines.	No mitigation is required or recommended.	No impact.			
Archaeological Resources: Implementation of the proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.	CR-1 Prior to the issuance of grading permits, the project developer shall retain a qualified archaeologist to prepare an Archaeological Monitoring and Discovery Plan (AMDP) to ensure the proper treatment and long-term protection of unanticipated discoveries during project construction. The AMDP shall be submitted to the City for review and approval. The AMDP shall provide a description of the methods to be undertaken during monitoring and the steps to be taken in the event of an archaeological discovery during construction, including, at minimum:  • Development of research questions and goals to be addressed by the investigation in the event of a find.	Less than significant impact.			
	<ul> <li>Detailed field strategy used to record, recover, or avoid the finds and address research goals.</li> <li>Analytical methods to be employed for identified resources.</li> <li>Analytical methods to be employed for identified resources.</li> <li>Disposition of the artifacts.</li> <li>CR-2 The project developer shall retain a qualified archaeologist to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training shall be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology (National Park Service [NPS] 1983). Archaeological sensitivity training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a find.</li> </ul>				

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	CR-3 The project developer shall ensure that archaeological and Native American monitoring is provided of all project-related ground disturbing activities. Archaeological monitoring shall be performed under the direction of the qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (NPS 1983). The qualified archaeologist, in consultation with the City of Camarillo and the Native American monitor, may recommend the reduction or termination of monitoring depending upon observed conditions (e.g., no resources encountered within the first 50 percent of ground disturbance). If archaeological resources are encountered during ground-disturbing activities, work within a minimum of 50 feet of the find must halt and the find evaluated for CRHR eligibility. Should an unanticipated resource be found as CRHR eligible and avoidance is infeasible, additional analysis (e.g., testing) may be necessary to determine if project impacts would be significant.	
	CR-4 If cultural resources are encountered during ground-disturbing activities after the completion of the original monitoring required under mitigation measure CR-3, work in the immediate area must halt and the archaeologist shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for the CRHR eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts to historical resources.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Tribal Cultural Resources: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:  1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or  2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the	Mitigation measures CR-1 through CR-4 are applicable to this impact.	Less than significant impact.
significance of the resource to a local California Native American tribe.		
Human Remains: The proposed project could disturb any human remains, including those interred outside of formal cemeteries. Compliance with applicable codes would reduce this potential impact to a less than significant level.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts	
Energy			
<b>Energy Consumption:</b> The proposed project would not consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.	No mitigation is required or recommended.	Less than significant impact.	
<b>Energy Efficiency:</b> The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	No mitigation is required or recommended.	Less than significant impact.	
	Geology and Soils		
Earthquake Fault Zoning: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.	No mitigation is required or recommended.	Less than significant impact.	
Seismic Ground Shaking: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	No mitigation is required or recommended.	Less than significant impact.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Ground Failure: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	No mitigation is required or recommended.	Less than significant impact.
Landslides: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	No mitigation is required or recommended.	No impact.
<b>Soil Erosion:</b> Implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil during project construction and/or operations.	No mitigation is required or recommended.	Less than significant impact.
<b>Soil Stability:</b> Implementation of the proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.	No mitigation is required or recommended.	Less than significant impact.
Expansive Soil: The proposed project may be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Implementation of the soils report recommendations as required by the City would reduce the potential impact of the project to a less than signifiant level.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
<b>Expansive Soil:</b> The existing golf course operation also does not currently use a septic tank and the proposed project would not require the use of septic tanks.	No mitigation is required or recommended.	No impact.
Paleontological Resources: The proposed project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	GS-1 The project developer must include in construction contracts the requirement that project grading be halted, temporarily diverted, or redirected if any paleontological materials are encountered during project construction. The services of a qualified paleontologist must be secured by contacting the Center for Public Paleontology, which can be found at the following universities; USC, UCLA, California State University at Los Angeles, or California State University at Long Beach, to develop an acceptable monitoring and fossil remains treatment plan if resources are uncovered. If resources are uncovered, they shall be prepared to the point of identification and catalogued before they are donated to their final repository. All resources collected shall be donated to a public, nonprofit institution with a research interest in the materials. A report detailing the results of these efforts, identifying all resources collected, and naming the repository shall be submitted to the Department of Community Development at the completion of project construction, if resources had been found.	Less than significant impact.
	Greenhouse Gas Emissions	
Generation of GHG Emissions: The proposed project would generate greenhouse gas emissions but would not exceed the thresholds of significance recommended by the Ventura County Air Pollution Control District.	No mitigation is required or recommended.	Less than significant impact.
Consistency With GHG Plans: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts	
	Hazards and Hazardous Materials		
Routine Use and Transport of Hazardous Materials: Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No mitigation is required or recommended.	Less than significant impact.	
Release of Hazardous Materials: Implementation of the proposed project could 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.	HM-1 Prior to the issuance of grading permits, the project developer shall have a Phase II Environmental Site Assessment prepared and completed to evaluate whether residual pesticides or heavy metals associated with historical herbicide applications are present above regulatory residential screening levels, human health risk criteria or California hazardous waste levels. Composite soil samples should be collected on one-acre centers within the property with historical agricultural use. Soil samples should be collected at 1.0 and 3.0 feet below ground surface (bgs) for analysis of organochlorine pesticides (OCPs) and associated heavy metals. The 1.0 feet bgs sample should be submitted to the laboratory and analyzed for organochloride pesticides and lead and arsenic related to historic agricultural uses. The remaining 3.0 feet soil samples collected should be placed on hold pending the analytical results of the first round of soil samples. Soil samples for OCPs and heavy metals should be analyzed by EPA test methods 8081 and 6010. If the samples identify any areas where residual pesticide or heavy metal readings exceed the applicable screening levels or human health standards, the project developer shall prepare and submit to the City a soil management and remediation program to reduce the readings to an off-site Class III landfill, implementation of a soil management program to reduce the concentrations present, or leaving the material in place and capping it with clean fill material.	Less than significant impact.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	HM-2 Prior to the issuance of grading permits, the project developer shall conduct a geophysical survey and collection of soil vapor and soil samples to evaluate any impact from these features. Soil samples should be analyzed for TPH (full scan) and VOC analysis by U.S. EPA test methods 8015M and 8260 along soil vapor for VOC and TPHv analysis by EPA test method TO-15. Analytical results should be compared to regulatory screening level for commercial and residential land use set by the United States Environmental Protection Agency (US EPA), Region 9 Regional Screening Levels (RSLs), dated November 2019 or Department of Toxic Substance Control (DTSC) Hero Note #3, dated April 2019. If the samples identify any areas where the soil or soil vapor readings exceed the applicable screening levels or human health standards, the project developer shall prepare and submit to the City a soil management and remediation program to reduce the readings to acceptable levels.	
	HM-3 Prior to the issuance of grading permits, the project developer shall conduct a subsurface investigation including a geophysical survey and soil sampling to evaluate potential impact associated with the former oil wells. If any soil requiring remediation due to presence of the wells is identified, the project developer shall prepare and submit to the City a soil management and remediation program to remediate the soil to acceptable levels by measures such as removal of the contaminated soils to an off-site Class III landfill, implementation of a soil management program to reduce the concentrations present, or leaving the material in place and capping it with clean fill material. If any wells are identified, the project developer shall comply with Mitigation Measure HM-4.	
	HM-4 Prior to the issuance of grading permits, the project developer shall have all wells identified within the project site tested for liquid and gas leakage. Any wells found leaking shall be reported to CalGEM immediately. The developer shall submit a report of findings to CalGEM and the City of Camarillo. Surveyed locations shall be provided in Latitude and Longitude, NAD 83 decimal format.	
	HM-5 Prior to the issuance of grading permits, the project developer shall submit to the City of Camarillo a report that identifies all oil wells in the vicinity of the grading and construction areas and that specifies whether the wells are to be reabandoned to current CalGEM Idle Well Program standards or whether grading and construction setbacks are being provided from the well casings.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Release of Hazardous Materials Near Schools: Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No mitigation is required or recommended.	No impact.
Hazardous Materials Sites: Implementation of the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.	No mitigation is required or recommended.	No impact.
<b>Aircraft Hazards</b> : Implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area due to aircraft operations.	No mitigation is required or recommended.	No impact.
Emergency Evacuation: Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	No mitigation is required or recommended.	No impact.
<b>Wildfire</b> : The proposed project would not expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Hydrology and Water Quality		
Water Quality: Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	No mitigation is required or recommended.	Less than significant impact.
Groundwater Supplies: Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	No mitigation is required or recommended.	Less than significant impact.
Erosion and Siltation: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces, and could result in substantial erosion or siltation onsite or offsite.	HWC-1 The project developer shall submit a complete energy dissipator and outlet structure design at Margarita Avenue that demonstrates a reduction in flow velocities from 9 feet per second (fps) to 3 fps.	Less than significant impact.
Flooding: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite.	No mitigation is available.	Significant and unavoidable impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Runoff Water: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff.	No mitigation is available.	Significant and unavoidable impact.
Flood Flows: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could impede or redirect flood flows.	No mitigation is available.	Significant and unavoidable impact.
Flood Hazards: The proposed project would be located in an existing flood hazard zone but would remove the development area from the flood hazard zone and reduce the release of pollutants due to project inundation.	No mitigation is required or recommended.	Less than significant impact.
Water Quality Plans: Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts	
	Land Use and Planning		
Physically Divide an Established Community: Implementation of the proposed project would not physically divide an established neighborhood or community.	No mitigation is required or recommended.	No impact.	
Land Use Plan Consistency: Implementation of the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation or applicable goal or policy from the City of Camarillo General Plan that was adopted for the purpose of avoiding or mitigating an environmental effect.	No mitigation is required or recommended.	Less than significant impact.	
	Noise and Vibration		
Increases in Noise Levels: Construction of the proposed project would comply with City of Camarillo Municipal Code restrictions. Operation of the proposed project would not generate substantial permanent increases in noise levels.	No mitigation is required or recommended.	Less than significant impact.	
<b>Ground-borne Vibration</b> : Construction and operation of the proposed project would not generate excessive ground-borne vibration.	No mitigation is required or recommended.	Less than significant impact.	

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Airport Noise Levels: The proposed project would not expose people residing or working in the project area to excessive noise levels from aircraft operations from Camarillo Airport and Naval Base Ventura County.	No mitigation is required or recommended.	No impact.
	Population and Housing	
<b>Population Growth</b> : The proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly.	No mitigation is required or recommended.	Less than significant impact.
<b>Displacement of People and Housing</b> : The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No mitigation is required or recommended.	No impact.
	Public Services and Recreation	
Public Service: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts	
Increased Use of Parks: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	No mitigation is required or recommended.	Less than significant impact.	
New Recreational Facilities: The proposed project includes reconstructed recreational facilities which might have an adverse physical effect on the environment.	All of the mitigation measures identified in this EIR are applicable to this impact.	Less than significant impact.	
	Transportation		
Circulation System Programs, Plans, Ordinances, and Policies: Implementation of the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	No mitigation is required or recommended.	Less than significant impact.	
<b>Reduction of VMT</b> : Implementation of the proposed project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b) for the reduction of vehicle miles travelled.	No mitigation is required or recommended.	Less than significant impact.	
Roadway Hazards: Implementation of the proposed project would not substantially increase hazards due to a design feature or incompatible uses.	No mitigation is required or recommended.	Less than significant impact.	
<b>Emergency Evacuation</b> : Implementation of the proposed project would not result in inadequate emergency access.	No mitigation is required or recommended.	Less than significant impact.	

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TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	Utilities and Service Systems	·
New or Expanded Utility Facilities: The proposed project would require the construction of new expanded water, wastewater treatment, or storm water drainage, electric power, or natural gas, or telecommunications facilities, but the construction or relocation of which would not cause significant environmental effects.	No mitigation is required or recommended.	Less than significant impact.
Water Supplies: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	No mitigation is required or recommended.	Less than significant impact.
Wastewater Treatment: The Camarillo Wastewater Treatment Plant has adequate capacity to accommodate the wastewater generation of the proposed project.	No mitigation is required or recommended.	Less than significant impact.
Solid Waste Generation: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	No mitigation is required or recommended.	Less than significant impact.
<b>Solid Waste Regulations</b> : The proposed project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	Wildfire	
<b>Emergency Evacuation</b> : The proposed project would not substantially impair an emergency response plan or adopted emergency evacuation plan.	No mitigation is required or recommended.	Less than significant impact.
Exacerbate Wildfire Risks: The proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	No mitigation is required or recommended.	Less than significant impact.
Infrastructure Wildfire Risks: The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	No mitigation is required or recommended.	Less than significant impact.
Post-Wildfire Risks: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	No mitigation is required or recommended.	Less than significant impact.

TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
	Impacts Not Found to be Potentially Significant	
Agriculture and Forestry Resources: The project would not convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	No mitigation is required or recommended.	No impact.
<b>Agriculture and Forestry Resources</b> : The project would not conflict with existing zoning for agricultural use or a Williamson Act contract.	No mitigation is required or recommended.	No impact.
Agriculture and Forestry Resources: The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	No mitigation is required or recommended.	No impact.
<b>Agriculture and Forestry Resources</b> : The project would not result in the loss of forest land or conversion of forest land to nonforest use.	No mitigation is required or recommended.	No impact.
Agriculture and Forestry Resources: The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.	No mitigation is required or recommended.	No impact.

# TABLE 2-1 - SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Environmental Impacts	Mitigation Measures	Residual Impacts
Mineral Resources: The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	No mitigation is required or recommended.	No impact.
Mineral Resources: The project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.		No impact.

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# **ENVIRONMENTAL SETTING**

CEQA requires that an EIR include a description of the physical environmental conditions in the vicinity of the project site, as they exist at the time the NOP is published, or if no NOP is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. Additional descriptions of the environmental setting as it relates to each of the environmental topics analyzed in this EIR are included in the environmental setting discussions provided within the technical sections of this EIR.

As part of the environmental setting, this section also identifies the amount of cumulative development currently envisioned for the vicinity of the project site. This is important since, in many cases, the impact of a single project may not be significant, but when combined with other projects, the "cumulative" impact may be significant. Section 15130 of the State CEQA Guidelines requires an EIR to assess not only an individual project's potential impacts, but also the cumulative impacts when combined with other projects.

Section 15125(d) of the State CEQA Guidelines requires that an EIR discuss any inconsistencies between the proposed project and applicable general plans and regional plans. While this requirement is listed in the Environmental Setting section of the State CEQA Guidelines, it does not make much sense to discuss the effects of a project in a section of the EIR that is merely describing the physical environmental conditions in the vicinity of the project site. Instead, consistency of the proposed project with all applicable policies from applicable local and regional plans is discussed in the Land Use and Planning section of this EIR.

#### **REGIONAL SETTING**

#### **Project Site Location**

The proposed project site is located within the City of Camarillo in Ventura County. As shown in Figure 3-1, the City of Camarillo is located in southern Ventura County along the U.S. Highway 101 (Ventura Freeway) corridor. U.S. Highway 101 bisects the City along an east-west alignment. The City is surrounded by unincorporated county land. The City of Thousand Oaks is located to the east and the cities of Oxnard and San Buenaventura (Ventura) are located to the west.

Camarillo lies in the Pleasant Valley at the eastern edge of the Oxnard Plain, a fertile plain which is characterized in part by flat lands and rich soils. However, Camarillo is also distinguished by hills along its northern perimeter and the Santa Monica Mountains along its eastern perimeter. The majority of the City is approximately 150 feet above mean sea level while the northern foothill regions are as high as 360 feet above mean sea level. The topographic relief in Camarillo's planning area is more diverse, however,

with slopes ranging from approximately 30 feet above mean sea level in the relatively flat lands of the Oxnard Plain to approximately 1,814 feet above mean sea level along the extremely steep rise of the Santa Monica Mountains.

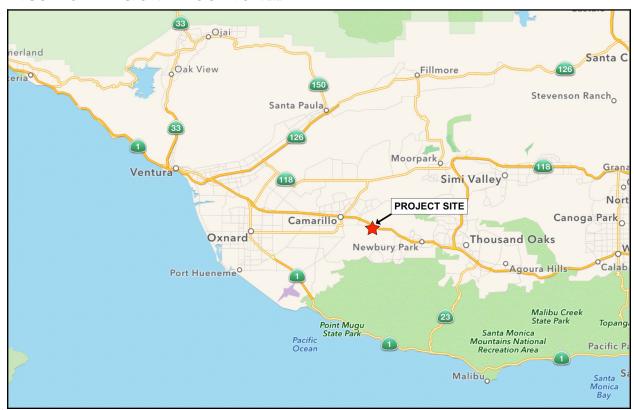


FIGURE 3-1 - REGIONAL LOCATION MAP

Camarillo has a mild Mediterranean-type climate with year round temperatures averaging in the low 70 degree range (Fahrenheit). Typically, precipitation averages approximately 16 inches per year. Fog and damp air frequently occur due to the proximity to the Pacific Ocean approximately nine miles to the southwest of the city, although "Santa Ana" conditions bring dry warm winds during the fall and winter. Air pollution levels in southern Ventura County are affected by a temperature inversion<sup>1</sup> and low average wind speeds.

A variety of land uses, such as agricultural, residential, commercial, office, and industrial occur within the City, which covers approximately 13,220 acres (20.66 square miles) within its incorporated boundary. Agricultural uses are typically found in the southern part of the city and are composed primarily of row crops including a variety of vegetables and fruits. Residential uses are located throughout the city, but mostly north of the Ventura Freeway. Commercial and office uses generally occur in business districts and shopping centers along the Ventura Freeway and major arterials, such as Ventura Boulevard, Carmen

<sup>&</sup>lt;sup>1</sup> Warm, dry air above cool marine air which creates a lid that keeps the marine air from rising.

Drive and Arneill Road. Industrial uses are primarily located along the railroad right-of-way in the central and eastern portions of the city and consist of manufacturing, research and development, and agriculturally-oriented industries.

Regional vehicular access to Camarillo is obtained primarily from U.S. Highway 101 and State Route 34 (Lewis Road). Other regional access routes located close to Camarillo include State Route 1 (Pacific Coast Highway) and State Route 118.

#### **LOCAL SETTING**

The proposed project site is the existing, privately-owned and operated, 182-acre Camarillo Springs Golf Course located at 791 Camarillo Springs Road in the eastern area of the city as illustrated in Figure 3-2. The project site is located within the larger Camarillo Springs area, which is an isolated community within the City of Camarillo. There are 967 residential units, 73,390 square feet of business center (office) space, 21,400 square feet of commercial retail space, and the 18-hole golf course within the Camarillo Springs area.<sup>2</sup>

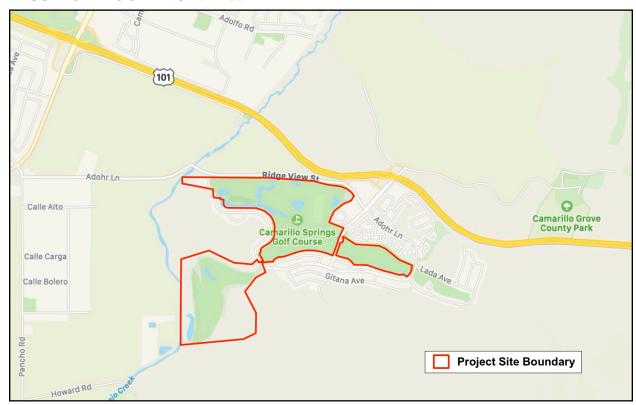


FIGURE 3-2 - LOCAL VICINITY MAP

<sup>&</sup>lt;sup>2</sup> Associated Transportation Engineers, March 8, 2023.

The land uses surrounding the project site are illustrated in Figure 3-3. As shown, the property is largely bordered by existing residential developments and open space. In the northwestern area, the property is bordered by Ridge View Street.





All of the residential areas east of Camarillo Springs Road are designated as Low-Medium Density Residential (10 dwelling units per acre max) in the City of Camarillo General Plan Land Use Element. The area east of Camarillo Springs Road and north of the golf course (Tract 5651 - the homes that are accessed via Adohr Lane) is zoned RPD (Residential Planned Development) and is developed with attached townhomes. The area east of Camarillo Springs Road and south of the golf course (also Tract 5651 - the homes that are accessed via San Dimas Avenue, Irena Avenue, and Gitana Avenue) is zoned RPD-10U (Residential Planned Development - 10 units per acre max) and is developed with detached single-family homes. A pocket of detached single family homes is located west of Camarillo Springs Road immediately north of the golf course parking lot (Tract 5409). This area is also designated Low-Medium Density Residential and is zoned RPD-10U. An age restricted mobile home community (the Camarillo Springs Country Club Village) is also located west of Camarillo Springs Road (Tract 3883). This area is designated as Mobile Home (7 dwelling units per acre max) in the City of Camarillo General Plan Land Use Element and is zoned RE.

The open space areas surrounding the project site are the adjacent hillsides and Conejo Creek. The hillside areas are designated as Natural Open Space in the City of Camarillo General Plan Land Use Element and are zoned Open Space. The adjacent Conejo Creek area is designated as a Waterway Linkage in the City of Camarillo General Plan Land Use Element and is zoned Open Space.

A commercial center is located adjacent to the golf course at the southwestern corner of Camarillo Springs Road and Ridgeview Street. This center includes two buildings and an indoor soccer arena. It is designated as General Commercial in the City of Camarillo General Plan Land Use Element and is zoned CPD (Commercial Planned Development).

The undeveloped area north of Ridge View Street east of Conejo Creek is largely under agricultural production but is designated as Research and Development in the City of Camarillo General Plan Land Use Element and is zoned LM (Limited Manufacturing).

A complex of single-story office buildings is located at the northwestern corner of Camarillo Springs Road and Ridge View Street. This property is designated as Office in the City of Camarillo General Plan Land Use Element and is zoned PO (Professional Office).

Historically, the Camarillo Springs area has experienced numerous natural hazard events including fires, local (Camarillo Springs Creek) and regional (Conejo Creek) flooding, hillside instability, and debris flow. These events include the Conejo Grade Fire in June 1957, the Conejo Grade Brush Fire in September 1968, the Hill Canyon Fire in October 1980, and Conejo Creek/Camarillo Springs Creek flooding in March 1983. In May 2013, the Springs Fire burned through and eliminated much of the vegetation along the surrounding slopes, increasing the likelihood of hillside instability. Heavy and intense rainfall events swept through the area in November and December of 2014 creating substantial public safety hazard events that resulted in substantial residential and general infrastructure damage due to mud and debris flows. As a result, the City of Camarillo has invested substantial capital in the installation of numerous debris flow control systems.

## DESCRIPTION OF THE PROJECT SITE

Camarillo Springs Golf Course is a 182-acre, privately-owned facility located at the base of the Conejo Mountains. The golf course was approved for development by the City of Camarillo in 1970 and has been developed and operational for more than 45 years. The site is located at 791 Camarillo Springs Road and includes Assessor's Parcel Numbers 234-0-040-420, 234-0-040-595, 234-0-040-740, 234-0-040-750, 234-0-040-760, 234-0-040-770, 234-0-181-115, 234-0-201-045, 234-0-201-055. The existing parcels are illustrated in Figure 3-4.

Camarillo Springs Golf Course is an 18-hole Par 72 public golf course with a length of 6,375 yards. The golf course is characterized by tee boxes, fairways, putting greens, bunkers, water hazards, a driving

range, a golf cart building, pergola, pro shop building, breezeway, clubhouse/restaurant building, maintenance buildings, and other ancillary buildings such as comfort stations. The clubhouse/restaurant, pro shop, and golf cart buildings are grouped near the center of the property adjacent to the parking lot and primary entrance from Camarillo Springs Road. Two maintenance buildings are located at the northwest edge of the property near Ridge View Street. The golf course is open for public use and play, as well as tournaments, and its hours of operation are from 6:00 a.m. until sundown, seven days per week. The property also includes two segments of Conejo Creek along its western borders.

# **Current Land Use and Zoning Designations**

The golf course is designated as Public/Quasi-Public in the City of Camarillo General Plan Land Use Element and is zoned RE (Rural Exclusive) and RE - 1 Acre. Public uses include parks, schools, libraries, police facilities and fire facilities. The quasi-public classification of the General Plan provides land areas for those uses which are private in nature but will serve the public needs. This includes such uses as hospitals, private educational institutions, religious institutions, and other similar uses such as golf courses. The Conejo Creek area of the property is designated as a Waterway Linkage in the City of Camarillo General Plan Land Use Element and is zoned Open Space. The land use designations of the project site and surrounding uses are illustrated in Figure 3-5.

The RE zone is a large lot residential zone with lots varying in size from 10,000 square feet to one acre or larger in size with a limited area used for mobile home parks. The majority of the City's land in this zone is for residential uses with the remainder in public and semi-public uses or vacant. Pursuant to Section 19.12.030 of the Camarillo Municipal Code, publicly or privately owned golf courses, including clubhouse and accessory restaurant, and pro shop, are permitted within the RE zone with a conditional use permit. The zoning areas of the project site and surrounding uses are illustrated in Figure 3-6.

#### **Historic Uses**

Designed by Theodore "Ted" Robinson, Sr., the Camarillo Springs Golf Course was developed starting in 1971 and opened to the public in 1972. Sited at the base of Conejo Mountain, the golf course was developed on a portion of the former Camarillo Ranch.

Over time, the Camarillo Springs Golf Course changed in size and configuration. Between 1980 and 1989 the western portion of the course was expanded further to the south. Between 1989 and 1994 a new section of Ridge View Street was constructed through what had been the northeastern edge of the golf course. The property that as a result was located on the north side of the street (near the U.S. Highway 101 off-ramp) discontinued being used as part of the golf course and was sold for redevelopment. An office park was developed on the former golf course property between 2002 and 2005. Additionally, in the early to mid-2000s a housing development and commercial center were constructed adjacent to the golf course and its parking lot, fronting Camarillo Springs Road.



FIGURE 3-4 - EXISTING PROJECT SITE PARCELS

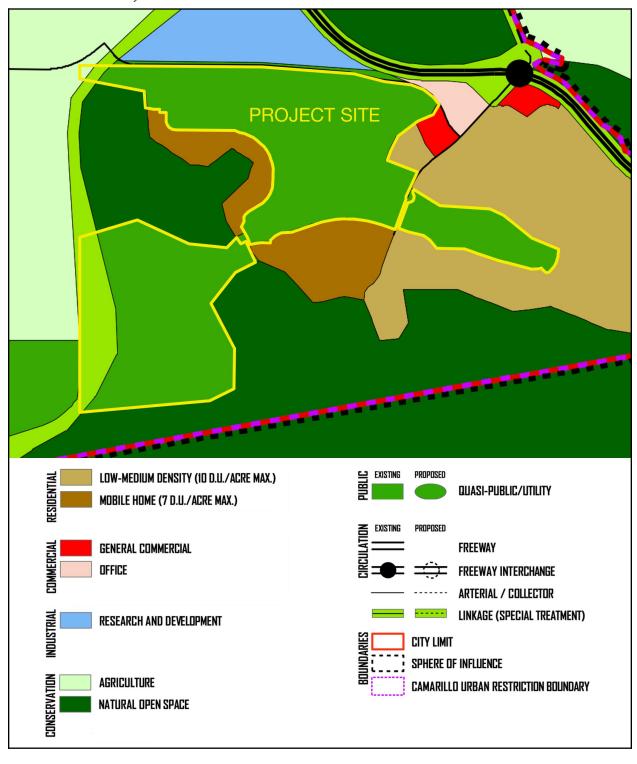
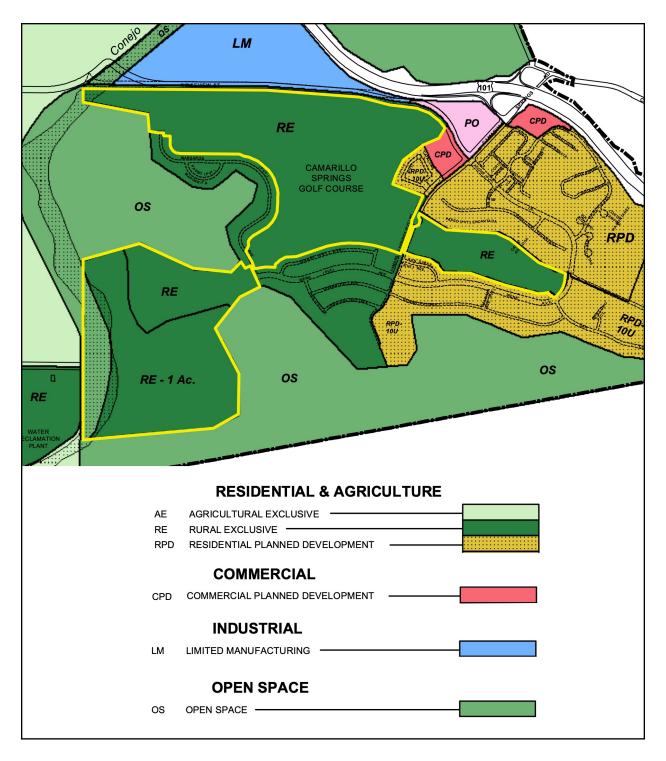


FIGURE 3-5 - PROJECT SITE AND SURROUNDING USES LAND USE MAP

FIGURE 3-6 - PROJECT SITE AND SURROUNDING USES ZONING MAP



Over the years, various features across the golf course have been modified. Putting greens, tee boxes, water hazards and bunkers (sand traps) have been added, removed or relocated. In particular, the current hole 12 (which used to be hole 1) at the northeast edge of the property was shortened when Ridge View Street was extended and a portion of the golf course sold as described above, and later modified twice again; bunkers north of the driving range were removed; water hazards have been added at the

northeastern edge of the golf course and slightly northwest of the driving range; the western area of the golf course was enlarged; and the alignment of paved paths has been modified. A new restroom building was constructed in the Spanish Revival style in 1999 which is not in keeping with the original concrete and wood Modernist-style buildings. New black tee boxes were added to all the holes on the course over the last twenty years to increase yardage. The par was also changed on various holes.

# **Existing Site Biology**

Approximately 117 acres of the project site consist of landscaped ornamental vegetation and approximately nine acres are developed with pavement, buildings, and golf cart roads and trails. Approximately 7.1 acres are considered to be heavily disturbed and support little to no vegetative cover. The remaining areas of the site contain natural vegetation and open water. A few of these areas support special status habitats, plans, and wildlife.

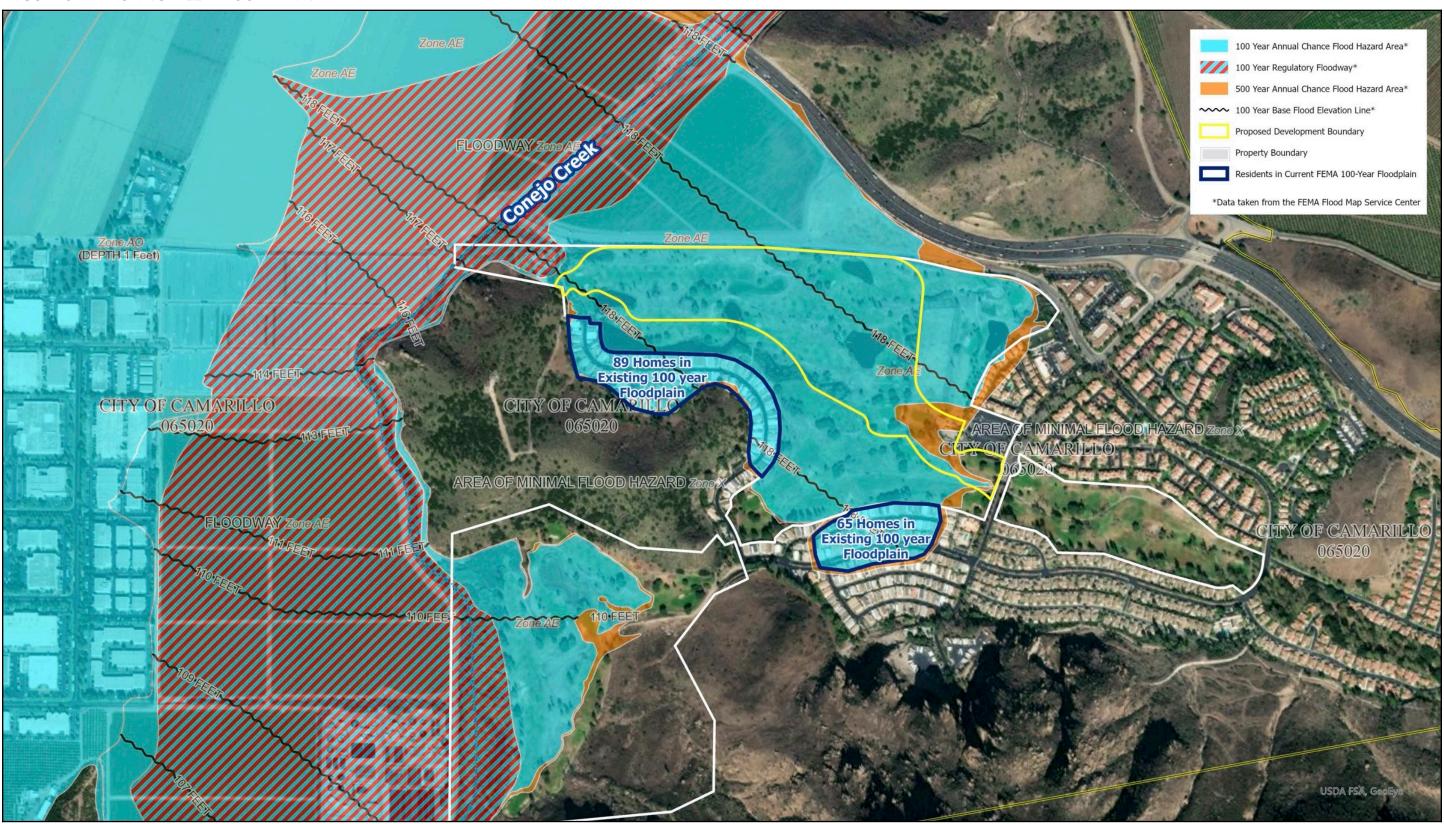
# **Existing Site Hydrology**

Camarillo Springs Golf Course is located within the local 1,111-acre Camarillo Springs Creek watershed, tributary to the 48,122-acre Conejo Creek regional watershed, which is part of the larger Calleguas Creek regional watershed.

Portions of the golf course and adjacent areas are located within a 100-year Federal Emergency Management Agency (FEMA) floodplain resulting primarily from overbank flow from Conejo Creek, but is also affected by tributary runoff flowing through the golf course from the local Camarillo Springs Creek watershed. The 100-year floodplain has a base flood elevation of 118.0 feet. The FEMA floodplain is illustrated in Figure 3-7. As shown, there are approximately 154 existing mobile homes located within the 100-year FEMA floodplain to the south and southwest of the golf course.

There are six man-made, ornamental ponds on the northern side of the golf course. There are also three dry man-made, ornamental ponds and one full irrigation pond on the southern side of the golf course. Although they may provide some stormwater quality treatment, the existing ponds/lakes do not provide the infiltration/retention or water quality treatment that is required of new development and redevelopment projects under the Ventura County Municipal Stormwater NPDES Permit, Board Order 2010-0108.

FIGURE 3-7 - EXISTING FEMA FLOODPLAIN



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## **Existing Site Access**

Primary access to the property is from a main entrance located along the western side of Camarillo Springs Road. Secondary access for property maintenance is located off of Ridge View Street. Parking for the golf course is provided in one lot accessed from Camarillo Springs Road. This lot provides 199 parking spaces. A gated access to the existing maintenance buildings at the northwest edge of the property is provided along Ridge View Street. This access is a private segment of Margarita Avenue that is also gated at the property boundary with the Camarillo Springs Country Club Village mobile home community. Residential access through the golf course property is not permitted.

## **Existing Utilities and Infrastructure**

The project site is located within the service area of the Camrosa Water District (Camrosa) for potable water and is in Camrosa's Pressure Zone 1. The existing 3-million-gallon tank that feeds this area is located on the hillside directly north of the 101 freeway across from the project site. An existing 12-inch water main is located within Ridge View Street. The golf course is irrigated by private water from existing wells located adjacent to Conejo Creek along the westerly edge of the golf course - south area of the project site.

Wastewater from the project area is treated by the Camarillo Sanitary District, which operates and maintains the Camarillo Wastewater Treatment Plant west of Conejo Creek. The Camarillo Springs area is serviced via an existing 15-inch vitrified clay pipe (VCP) line in Margarita Avenue, which ties into a 10-inch and 8-inch VCP siphon east of Conejo Creek and traverses underneath the existing channel connecting to a siphon pump structure and a 24-inch asbestos cement pipe sewer line. The pipe then connects via a 5-foot manhole to a 12-inch VCP line, which then continues to the treatment plant.

Electricity is provided to customers in Camarillo by Southern California Edison (SCE) and natural gas is provided by the Southern California Gas Company. The golf course and Camarillo Springs community is fed with a single 16kV electrical circuit with nearby facilities located within Camarillo Springs Road and Rideview Street. The nearest natural gas facilities are six-inch lines located within Camarillo Springs Road and Margarita Avenue. The City of Camarillo has an Exclusive Agreement with E.J. Harrison & Sons trash company for regular day-to-day refuse service.

## **RELATED PROJECTS**

In addition to the potential environmental impacts that would be associated with the proposed project, this EIR also evaluates "cumulative impacts." Section 15355 of the State CEQA Guidelines defines cumulative impacts as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. In general, these impacts occur in conjunction

with other related development that may have impacts that might compound or interrelate with those of the project under review.

In order to analyze the cumulative impacts of the proposed project in combination with other expected future development, the amount and location of growth expected to occur in addition to the proposed project must be considered. Section 15130(b) of the State CEQA Guidelines allows the following two methods of prediction:

- A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

This EIR utilizes the City of Camarillo's Monthly Report from April 2020 to identify the projects that have been recently completed, are under construction, approved, or pending as a list of related projects throughout Camarillo. The April 2020 Monthly Report is included as Appendix D to this EIR and a list of the City's related residential projects, including the proposed project, is provided in Table 3-1 while Table 3-2 identifies the City's related non-residential projects.

Between the time that the original Draft EIR was prepared and the Revised Draft EIR was prepared, an additional project was proposed within the Camarillo Springs Golf Course property. On November 17, 2020, the California Department of Fish and Wildlife (CDFW) was notified by the California Office of Emergency Services of oil that was observed in what is referred to as Pond 7 at the golf course and that the oil was injuring wildlife. Pond 7 is a lined, unvegetated, man-made pond that is used for drainage from the adjacent residential neighborhood to the east. It receives drainage via a 24-inch storm drain pipe beginning within Calle Cataluna and ending in the southern edge of the pond. Pond 7 is also connected to Pond 6 via a 12-inch drain pipe. Although Pond 7 is unvegetated, it can be used by native and migratory bids for drinking and rest.

A review of historical data along with geophysical exploration of the Pond 7 area and analytical laboratory soil and water samples collected during early 2021 within and adjacent to Pond 7 have concluded that the source of the oil in Pond 7 has been from an intermittent, subsurface oil and gas seep or series of seeps that are located immediately underneath or adjacent to Pond 7. No former wells are believed to be involved with or a source of the oil contained in Pond 7. The oil floating on Pond 7 is a naturally occurring crude oil along with very minor amounts of natural gas. The oil and gas is not a refined petroleum product that has escaped from a pipeline or other accidental release.

TABLE 3-1 - CITY OF CAMARILLO RESIDENTIAL PROJECTS

Case	Applicant	Location	Acres	Description	Units Built	Total Units	Status
CUP-350	Fore Property	Southwest corner of Ponderosa Dr and Camino Tierra Santa (Springville)	3.94	Mixed-use rental	50	50	Completed
TT-5903 RPD-177	KB Home Mariposa	South side of Ponderosa Dr between Camino Tierra Santa and Earl Joseph Dr (Springville)	10.71	Condominiums	130	130	Completed
RPD-195 TT-5671M(3)	Ran Rancho	Northwest corner of US 101 and Springville Dr (Springville)	22.87	Single Family	0	158	Pending (GPA)
CUP- 307M(2)	Hiji Investment Co	Between Village at the Park Dr and Westpark Ct (Village at the Park)	3.21	Mixed-use rental	0	10	Pending
RPD-188	Aldersgate Inv, LLC	350 Lewis Road (Village Gateway Townhomes)	7.8	Townhomes	58	87	Under Construction
CUP-330	Aldersgate Inv, LLC	2024 Ventura Blvd	0.59	Mixed-use rental	23	23	Completed
LD-537 RPD-199	Jim Sandefer	Southerly terminus of Barcelona St	3	4 single family lots	0	4	Pending
RPD- 189M(2)	Hiji Investment Co	West of Village at the Park Dr between Petit St and Westpark Ct (Village at the Park)	4.63	Rental units	0	96	Approved
TT-5976 RPD-198	Shea Homes	Northeast corner of Somis and Upland Roads	83.1	Senior single family & townhomes	0	281	Grading
RPD-201	Camino Ruiz, LLC and ZDI, Inc	Southeast corner of Camino Ruiz and Verdugo Way	13.79	Rental apartments	0	378	Pending (GPA)
RPD-202	Lustra Development, LLC	Southeast corner of Glenn Dr and Chapel Dr	0.34	Rental townhomes	0	8	Approved
CUP-391	Lustra Development, LLC	99 South Glenn Dr	0.24	Mixed-use, apartments	0	12	Approved
RPD-204 TT-6016	NUWI Camarillo, LLC	791 Camarillo Springs Rd	30	Senior for-sale units	0	248	Pending (GPA)

TABLE 3-1 - CITY OF CAMARILLO RESIDENTIAL PROJECTS

Case	Applicant	Location	Acres	Description	Units Built	Total Units	Status
LD-544 RPD-203	Habitat for Humanity	2521 Barry St	0.18	Low-income units	0	2	Under Construction
TT-5969 RPD-196	Camarillo Village Homes, LLC	Northeast corner of Pleasant Valley and Lewis Roads	19.88	Townhomes	0	285	Approved
CUP-369	Camarillo Village Homes, LLC	Northeast corner of Pleasant Valley and Lewis Roads	3.44	Mixed-use apartments	0	24	Approved

Source of table data: City of Camarillo, April 2020.

TABLE 3-2 - CITY OF CAMARILLO NON-RESIDENTIAL PROJECTS

Case	Applicant	Location	Description	Building SF	Acres	Status			
	Commercial Projects								
CPD-226M(3)	Amara Shopping Center	Northeast corner of W. Ventura Blvd and Springville Dr	Commercial center	491,776	44.84	Approved			
CPD-236	Hiji Inv Co/TFR Inv Co	Between Village at the Park Dr and Westpark Ct (Village at the Park)	Commercial mixed-use center	42,630	10.02	Approved			
CPD-236M(1)	Hiji Inv Co/TFR Inv Co	Between Village at the Park Dr and Westpark Ct (Village at the Park)	2 commercial pads	8,000	1.54	Pending			
CPD-232M(2)	Carol D'Egido	Northwest corner of Santa Rosa Rd and Oak Canyon Rd	2 office/retail buildings	8,828	1.26	Approved			
CUP-330	Aldersgate Inv. LLC	2024 Ventura Blvd between Cedar and Oak Streets (Old Town)	Mixed-use	6,100	0.58	Under Construction			

TABLE 3-2 - CITY OF CAMARILLO NON-RESIDENTIAL PROJECTS

Case	Applicant	Location	Description	Building SF	Acres	Status
CPD-77M(5)	Fairfield Inn and Suites	4444 Central Ave	Hotel conversion / renovation/ minor addition	1,175	1.9	Under Construction
CUP-334	City of Camarillo	South of W. Ventura Blvd East of Springville Dr	Bowling alley and 2-sheet ice rink	108,481	11.68	Pending
CUP-350	Fore Property Company	Southwest corner of Ponderosa Dr and Camino Tierra Santa (Springville)	Mixed-use	6,000	3.94	Completed
CPD-245	Alism Camarillo, LLC	301 E. Daily Dr	Automated Carwash	5,000	0.88	Under Construction
CPD-99M(4) CUP-381	Mohammad Rad	4676 Adolfo Rd	Convert auto repair facility to a convenience store	3,000	0.83	Completed
CUP-384 CPD-246	Mian Development	Northeast corner of Las Posas Rd and Ventura Blvd	Hotel and Conference Center	192,194	14	Under Construction
CUP-391	Lustra Development, Inc	99 South Glenn Dr	Mixed use, 12 apartments, 2 retail spaces	1,400	0.16	Approved
CUP-392	Reliant Land Services	2275 Las Posas Rd	New stealth roof- mounted wirelss facility	0	0.62	Pending
CPD-5M(27)	Brixmor Holdings 1 SPE, LLC	323 Carmen Dr	New drive-thru building	8,300	1.18	Pending
CPD-2M(3)	Motel 6	1641 Daily Dr	Façade remodel	10,000	1.37	Approved
CUP-371M(1)	Village Greens Market	795 Camarillo Springs Rd, Ste F	Modification to conditions of approval	1,250	0.91	Pending

TABLE 3-2 - CITY OF CAMARILLO NON-RESIDENTIAL PROJECTS

Case	Applicant	Location	Description	Building SF	Acres	Status
CUP-369	Camarillo Village Homes, LLC	Northeast corner of Pleasant Valley and Lewis Roads	24 mixed-use apartments	0	24	Approved
CUP-402	Reliant Land Service	25 Las Posas Rd	New stealth wireless facility in a tower	n/a	5.44	Pending
		Industrial Projects				
IPD-385M(1)	Zephyr Dev Company	South side of Verdulera St, 175' west of W. Ventura Blvd	Modify architecture and add 6,633 sq ft	54,559	3.50	Under Construction
IPD-390	PEGH Inv LLC, Trilliad Dev Inc	Northeast corner of Camino Carillo and Camino Ruiz	2 multi-tenant industrial	68,200	4.21	Approved
IPD-391	PEGH Inv LLC, Trilliad Dev Inc	Southeast corner of Camino Carillo and Camino Ruiz	2 multi-tenant buildings	70,615	4.61	Approved
IPD-392	PEGH Inv LLC, Trilliad Dev Inc	Southeasterly terminus of Camino Carillo west of Conejo Creek	2-unit building	56,450	3.93	Approved
IPD-393	PEGH Inv LLC, Trilliad Dev Inc	Southerly terminus of Camino Carillo west of Conejo Creek	2-unit building	88,185	4.79	Approved
IPD-394	PEGH Inv LLC, Trilliad Dev Inc	Southerly terminus of Balboa Circle, west of Conejo Creek	Single tenant industrial	20,832	1.86	Approved
IPD-395	PEGH Inv LLC, Trilliad Dev Inc	West side of Balboa Circle at the end of the cul- de-sac	Multi-tenant	23,602	1.29	Approved
IPD-396	PEGH Inv LLC, Trilliad Dev Inc	West side of Camino Carillo, approximately 230' south of Verdugo Way	Single tenant industrial	14,430	1.12	Approved
TT-5979	PEGH Inv LLC, Trilliad Dev Inc	Terminus of Camino Carillo, west of Conejo Creek	Tentative Tract Map for Lots 4-7	n/a	21.43	Approved
IPD-398 T-5890	Hiji Investment Co	South side of Camarillo Center Dr, between Las Posas Rd and Factory Stores Dr	4 Industrial condo buildings	129,016	10.78	Approved

TABLE 3-2 - CITY OF CAMARILLO NON-RESIDENTIAL PROJECTS

Case	Applicant	Location	Description	Building SF	Acres	Status
LD-539	Camino Ruiz, LLC	5151, 5153, 5155 Camino Ruiz	Land Division	n/a	19.98	Approved
IPD-53M(9)	Rexford Industrial Realty, Inc	3233 E. Mission Oaks Blvd	Modify industrial building	4,800	31.89	Under Construction
IPD-53M(11)	Rexford Industrial Realty, Inc	3233 E. Mission Oaks Blvd	Demo 52,500 sf office bldg. Construct 111,500 multi- tenant bldg. & add 52,026 to ex bldg	163,527	31.89	Pending
CUP-387	Verizon Wireless	4053 Calle Tesoro	New Wireless Facility	n/a	n/a	Pending
CUP-364M(1)	Institution Ale Company	3841 Mission Oaks Blvd, Ste. B	Expansion of existing brewery	24,102	1.9	Under Construction
LD-545	Robert F. Goetsch	201 Flynn Rd	Subdivide parcel into two parcels	n/a/	11.16	Approved
IPD-403	RGM Architects	950 W. Verdulera St	New Industrial Building	17,506	1.19	Pending
IPD-5M(1)	Sidney Isagholian	575 Dawson Dr	Adding new elevator	21,360	1.12	Pending
IPD-23M(25) TT-6015	EFT Enterprises LTD	4530 Adohr Ln	Façade renovations and 8 new condo units	67,867	3.34	Approved
CUP-397	Paw Works	2255 Pleasant Valley Rd, Unit K	Dog and cat rescue center	3,600	2.51	Approved
IPD-405	Zephyr Development	South side of Calle Tecate west of Flynn Rd	New Industrial Building	161,228	3.92	Pending
IPD-404	Silverstrand Grid	375 Willis Ave	Energy storage facility	n/a	0.04	Approved

TABLE 3-2 - CITY OF CAMARILLO NON-RESIDENTIAL PROJECTS

Case	Applicant	Location	Description	Building SF	Acres	Status				
CUP-404	Damily, LLC	3201 Corte Malpaso, Unit 310	Wine production facility	1,787	2.44	Pending				
CUP-401	Nabor Wines	1330 Flynn Rd, Unit E	Winery	2,236	4.29	Approved				
Institutional/Public Projects										
CUP-312	St. Demetrios Greek Church	5575 Santa Rosa Rd	Church (total of 31,240 sf in 3 phases)	9,058	4.07	Under Construction				
CUP-394	City of Camarillo	Northwest of the intersection of Las Posas and Lewis Rd	North Pleasant Valley Groundwater Treatment Facility	6,541	4.7	Under Construction				
CUP-379	Pleasant Valley Mutual Water Co	2411 Ponderosa Dr	Desalter	1,600	1.67	Approved				
CUP-403	Crestview Mutual Water Co	Crestview Estates/Las Posas Hills on Crestview Ave	Well Pump and Pump House	1,022	1.099	Pending				

Source of table data: City of Camarillo, April 2020.

The CDFW considers the oil seeps to be a risk to local wildlife such as water fowl and amphibians that can come into contact with water features that may contain oil. It is believed that the only way to keep the oil out of the water in Pond 7 is to abandon Pond 7 as a water storage feature.

In response, the golf course property owner (not the applicant for the Camarillo Springs GPA 2017-2 project) has been working with a geotechnical firm and CDFW staff to develop a work plan to backfill the pond and provide immediate mitigation for the threat that the oil seep poses to wildlife. A new drop inlet would intercept the existing storm drain pipe from the residential neighborhood just within the golf course property and a new storm drain pipe would then extend from the drop inlet to Pond 6. The existing drain pipe from Pond 7 to Pond 6 would be abandoned in place. Approximately 1,250 cubic yards of non-hazardous sludge is located vertically above the Pond 7 liner. This sludge will be removed and then the pond will be filled with approximately 2 to 3 feet of clean, uncompacted soil imported from off-site or collected from areas at the golf course.

The requested entitlement is a modification to the existing Special Use Permit (SUP) for the operation of Camarillo Springs Golf Course to allow the implementation of the proposed work plan. The requested entitlement is SUP-6M(4).

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# PROJECT DESCRIPTION

This section of the EIR describes the proposed Camarillo Springs GPA 2017-2 project, a 182-acre, 248-dwelling-unit senior residential and golf course renovation project (project or proposed project) proposed within the City of Camarillo. The purpose of this project description is to describe the project in a way that will be meaningful to the public, reviewing agencies, and decision-makers. According to CEQA, an adequate project description need not be exhaustive, but should supply the detail that is necessary for project evaluation of the proposed project's potential environmental impacts.

# PROJECT APPLICANT

The applicant for the Camarillo Springs GPA 2017-2 project is as follows:

NUWI Camarillo, LLC 2001 Wilshire Boulevard, Suite 401 Santa Monica, CA 90403

### **PROJECT OBJECTIVES**

The primary objectives for the project, as set forth by the project applicant, are:

- Assist the City in implementing the General Plan's housing goals by increasing the City's housing stock and diversifying the range of housing opportunities for a special needs population (seniors) in an area adjacent to existing, established residential communities.
- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.
- Provide a mix of high-quality housing to accommodate the City's growing senior population.
- Renovate an existing privately-owned golf course to address changing demands for golf alongside interrelated recreational amenities, thereby supporting the City's General Plan Recreation Element goals and policies.
- Develop a residential planned development that will make available a variety of housing designs and facilitate the use of innovative approaches to housing design thereby supporting the City's General Plan Housing Element goals and policies.

- Create opportunities for future and existing residents to socialize, dine, and recreate through the preservation and enhancement of golf and associated amenities, including a renovated clubhouse.
- Design a residential infill community that respects the privacy of adjacent residents through the utilization of setbacks and landscaped buffers.
- Enhance neighborhood walkability and connect existing and proposed residential communities to parks and recreational amenities through a network of trails, internal walkways, and paseos to be used by existing and proposed residents.
- Utilize sustainable design measures to reduce water usage, lower residential energy consumption, maximize energy saving features, and protect natural resources consistent with the City's land use goals and policies.
- Implement timely public facilities such as utilities, roads, and recreational amenities as development occurs within existing service areas without burden or cost to existing residents, visitors, or the City of Camarillo.

# PROJECT CHARACTERISTICS

# **Development Concept**

The project applicant is requesting approval from the City of Camarillo to amend the General Plan Land Use Element to change the land use designation for a 31-acre portion of the larger 182-acre project site from Public/Quasi-Public to Low-Medium Density Residential (5.1 - 10 dwelling units per acre) and change the zoning of this 31-acre portion from Rural Exclusive (RE) to RPD-8U (Residential Planned Development – 8 units per acre maximum). The area proposed for the General Plan Amendment (GPA) and change of zone is within one lot (234-0-040-595) and is specifically located south of Ridge View Street and west of the existing golf course driving range. The applicant is also requesting approval of a Tentative Tract Map (TT-6016) to subdivide the property for the development of up to 248 new agerestricted (55+) single family, detached residential units and a Residential Planned Development (RPD-204) permit for the development of 248 age-restricted (55+) single family detached dwelling units. The residential component of the proposed project would be developed to a density of approximately eight dwelling units per acre and would be gated. The residential development would include a private recreation center and open spaces that include two pocket parks and walking trail connectivity to the surrounding community.

Development of the residential area would require a reconfiguration and update of the existing golf course, proposed under Special Use Permit Modification SUP-6M(3). All existing cart paths, existing ponds, and other golf features (fairways, tees, greens, etc.) would be removed and redesigned as a 12-hole golf course. The golf course clubhouse would be renovated and enhanced within the existing building

footprint. The driving range and surrounding area would be renovated. The area to the east of the driving range would include a neighborhood park, walking trails, a dog park, and event spaces, all of which would be open and available for public use. The neighborhood park would be approximately 6.3 acres and the dog park would be approximately 1.3 acres. The existing maintenance buildings at the northwest edge of the property would remain in their existing building footprints.

The proposed development plan is illustrated in Figure 4-1. The conceptual trails, open space, and private/public amenities plan is illustrated in Figure 4-2.

#### **Site Access and Parking**

Gated access to the proposed residential development would be via Ridge View Street and Camarillo Springs Road to internal streets and drive aisles. All new streets would be private and maintained by the project homeowners association (HOA). The segment of Margarita Avenue within the property would be improved and the existing gate at Ridge View Street would be removed. Access to the residential development from Margarita Avenue would be provided by way of a County of Ventura Knox Box entry system along 'Street D.' No vehicles would be able to enter the site from the west without the Ventura County Fire Department operating the gate. Project residents would not have a key, fob, or controller to activate the entry function. Vehicles would be able to exit the residential development from this gate at any time by activating a sensor pad in the pavement. The Fire Department requested this so that residents would have an available emergency exit path of travel. The existing gate at the property boundary with the Camarillo Springs Country Club Village mobile home community would continue to remain closed with no mobile home access through the golf course property.

Most of the public who would use the public park and dog park are expected to be from the surrounding neighborhoods and would be able to walk to the parks.

The reconfigured golf course parking lot would provide 155 spaces and could be used by people who drive to the parks. Street parking along Ridge View Street is not allowed. The residential development includes 766 total parking spaces. 134 guest parking spaces (excluding garages and driveways) are provided. 496 garage parking spaces would be provided, two for each residential unit. 136 driveway parking spaces will be provided. At least 2.5 spaces would be provided per unit.

# Site Hydrology

The project's design proposes to preserve the amount of existing floodplain storage along Conejo Creek, to maintain or reduce base flood elevations through the area, and to remove the 154 existing residential structures from the current FEMA 100-year floodplain.

The project applicant proposes to raise the 31-acre residential development area to not only locate the homes above the 100-year FEMA floodplain, but to also act as a flood protection barrier along the northern boundary of the site. This barrier is proposed to protect the proposed residential area as well as

the 154 existing mobile homes that are subject to 100-year floods from the Conejo Creek floodplain. A total of 132 mobile home lots could be completely removed from the 100-year flood hazard zone. However, because some existing mobile home lots have elevations as low as 110 feet, a portion of 22 lots located along Margarita Avenue would remain partially within the 100-year flood zone. Specifically, the 154 mobile home lots within the FEMA 100-year floodplain could be affected as follows:

- There are 89 lots and residential structures in the west area generally adjacent to Margarita Avenue: 67 lots and residential structures could be completely removed from FEMA 100-year flood hazard, 22 lots immediately adjacent to the existing lake have existing ground below elevation 112.0 and, therefore, a portion of the lots would remain in the FEMA 100-year floodplain. However, all 22 lots could have the residential structure removed from the 100-year floodplain.
- There are 65 lots and residential structures in the south area generally adjacent to Irena Avenue: all 65 residential structures and the entire lots could be removed from the FEMA 100-year floodplain.

The reconfigured lake/pond along the southern edge of the proposed residential development would not only serve as a visual feature, but is also proposed to be a detention storage area for 56 acre-feet of storm water.

The proposed Master Drainage Plan is illustrated in Figure 4-3.

As shown in Figure 4-3, the East Basin would be located east of Camarillo Springs Road and would collect storm water and sediment from the 842-acre Upper Camarillo Springs Watershed. This basin would have a footprint of 3.1 acres and provide the capacity for 18 acre-feet of storm water storage (including 8.0 acre-feet of sediment and debris storage).

Excess storm water from the East Basin would then flow through the existing golf cart tunnel and proposed culverts located beneath Camarillo Springs Road and into the West Basin located to the west of Camarillo Springs Road. The westerly and southerly bank of the West Basin would have a breach resistant soil core design intended to prevent the basin from failing and allowing flows into the golf course lake. Instead of diverting the flows from the Upper Camarillo Springs Watershed into the golf course lake, the West Basin would divert the flows into three bypass culverts which would convey the flows to Conejo Creek. The main bypass culvert would travel under the proposed residential area and along Ridge View Street to an outlet at Margarita Avenue. A secondary double culvert would travel along the northern edge of the lake to the same outlet at Margarita Avenue. For storms greater than 100-year, a secondary overflow spillway from the West Basin would be utilized to direct higher flows north toward the driving range. The secondary overflow spillway would also used in the case of a blockage occurring in the bypass culverts.

FIGURE 4-1 - PROPOSED DEVELOPMENT PLAN



Revised Draft Environmental Impact Report

CLUBHOUSE, DRIVING RANGE \$ PARK KEY PROPOSED COMMUNITY NEW CLUBHOUSE

GOLF SHOP

RESTAURANT \$ BAR
OUTDOOR LOUNGE
PRACTICE GREENS
EVENT AREA NEW PARK

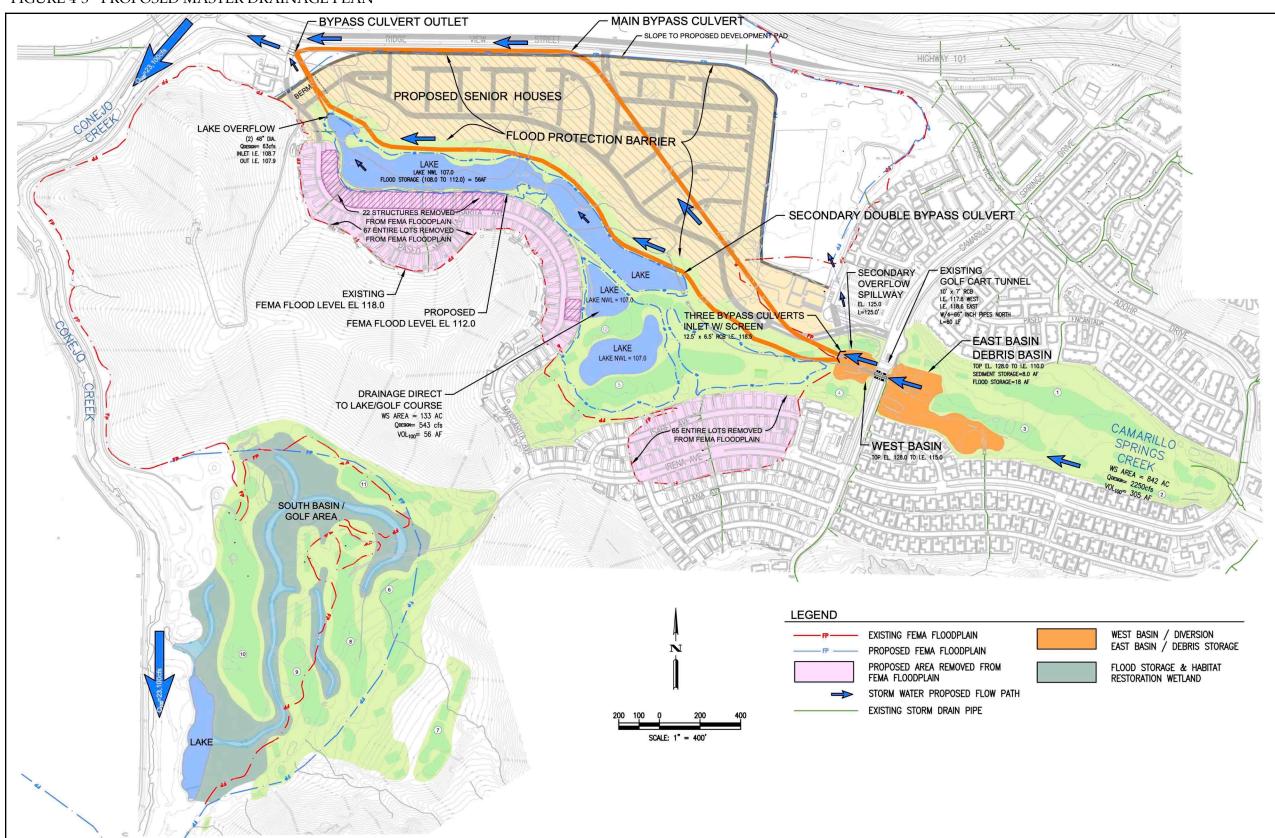
SHADED SEATING
OPEN TURF
PATHWAYS EXPANDED LAKE GATED COMMUNITY ENTRY NEW 55+ CLUBHOUSE

| POOL \$ SPA
| PICKLEBALL COURTS
| RAISED GARDENS
| OUTDOOR COOKING/DINING LAKE TRAIL EXISTING PARKING LOT IMPROVED DRIVING RANGE CART PATH POCKET PARK EXISTING POND REDESIGNED GOLF COURSE DOG PARK

FIGURE 4-2 - CONCEPTUAL TRAILS, OPEN SPACE, AND PRIVATE/PUBLIC AMENITIES

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FIGURE 4-3 - PROPOSED MASTER DRAINAGE PLAN



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4-8 Camarillo Springs GPA 2017-2

The golf course lake would capture the storm event flows from the adjacent hillsides and existing residences to the south, and the runoff from the southerly half of the new proposed development, but not from the main Upper Camarillo Springs Watershed. The lake would have a normal operating surface water elevation of up to 108 feet. The lake area would have a footprint of 19 acres and provide a surcharge capacity of 56 acre-feet of storm water storage between the normal elevation and the maximum flood elevation of 112 feet. Once the storm has passed through, the overflow would drain from the lake out to Conejo Creek through a 48-inch-diameter drainage pipe. A second 48-inch-diameter drainage pipe is proposed for redundancy. This second pipe could function as an emergency spillway in the event of a blockage of the main 48-inch drainage pipe. Each pipe would have a tide flex flap gate to prevent larger debris from getting trapped. Both 48-inch-diameter drainage pipes would also have manually activated gate valves. With this additional safety feature, if debris should be trapped, Conejo Creek floodwaters could be isolated from the lake by closing the gate valves. The valves are intended to only be used in an emergency condition. Once the flood level in Conejo Creek has receded, the gate valves could be opened and the lake would drain by gravity down to the non-storm water surface elevation (108 feet or below). At that point, what was blocking the overflow pipe and flap gate from sealing completely could be seen and removed.

According to the Master Drainage Plan and Floodplain Analysis, there are no elements of the proposed drainage plan that require active operational activity by anyone or anything (pumps, valves, actuators, level controls, etc.). The proposed drainage system is considered "passive" and includes multiple redundant safety features as part of the design effort. Operation and maintenance personnel are not required to perform any action for the system to function as designed during a flood event, unless the system is not functioning during a storm. Maintenance (as is required on every drainage facility) would happen before and after the annual rainy season.

The project applicant has proposed that the maintenance responsibility of the proposed drainage system ( East Basin, West Basin, bypass culvert inlets, outlet and length of the culverts, and two 48-inch-diameter lake drainage pipes (with flap gates and valves)) would be paid for as an annual assessment to the proposed new property owners and be the financial and management responsibility of the new property owners and not the City or the existing residents. The maintenance entity would be the new HOA. The project applicant has prepared a preliminary drainage system Maintenance Manual for use in evaluating the fiscal impacts of the project. The drainage system maintenance plan and easements would be finalized with completion of the final design and drainage improvement plans.

Creating the building pad for the proposed residences as well as removing the 154 existing residential structures from the mapped 100-year floodplain area would require the excavation and transfer of soils from other areas of the golf course and transferring the soils to the proposed residential area. Most of this would be obtained from the southern golf course area, which would be excavated and lowered to a level that preserves the existing amount of Conejo Creek floodplain storage. Specifically, the project grading

and design would increase the amount of floodplain storage in the southern golf course area by 325 acrefeet. This area is designed to provide storage for larger flow events, but would be graded to drain passively back to the Conejo Creek channel. The precise grading for the inlet and outlet configuration, which would be established during final design, would allow the storage volume to drain within the time required by the Ventura County Watershed Protection District. Engineered bank protection, which may be buried, is proposed to provide integrity to the inflow and outflow between the main Conejo Creek channel, and the golf course storage area and protect against erosion. A drainage easement is proposed to be dedicated to the Ventura County Watershed Protection District (VCWPD) over the storage and conveyance areas to ensure that the storage volume is maintained. Maintenance activities on the storage area would be under the jurisdiction of the VCWPD.

The project applicant submitted a Conditional Letter of Map Revision (CLOMR) to FEMA (Case No. 19-09-1295R) to modify the existing Flood Insurance Rate Map (FIRM) floodplain map in order to remove the 154 existing residential structures from the mapped 100-year floodplain area and facilitate new residential development at the golf course.

# **Water Quality**

The proposed development is required to mitigate post-construction stormwater runoff pollutants and volumes from impervious surfaces through infiltration, reuse, evapotranspiration, bioretention, or bioinfiltration, as required by the Ventura County Municipal Stormwater NPDES Permit, Board Order 2010-0108. To address the stormwater requirements, the project applicant has prepared and submitted to the City a Post Construction Stormwater Management Plan (PCSMP). The surface stormwater quality treatment facilities would be private and maintained by the HOA.

#### **Utilities and Infrastructure**

The proposed residential development would connect to the existing 12-inch water main located within Ridge View Street for potable water use. The new water mains internal to the project would be public and dedicated to the Camrosa Water District. The golf course would continue to be irrigated by private water from existing wells. The project applicant is also working with the Camrosa Water District to provide non-potable water for irrigation within the proposed residential area. The details of the non-potable connection have not been worked out at this time; however, the existing private wells are considered to be adequate to maintain the reconfigured golf course since it would be smaller than the existing course for which the wells currently provide water.

The proposed residential development would connect to the existing 15-inch vitrified clay pipe (VCP) sewer line in Margarita Avenue. The new sewer lines internal to the project would be private and maintained by the HOA. The applicant is proposing to upsize the existing 12-inch VCP sewer line west of

Conejo Creek to a new 15-inch sewer line to accommodate the increased wastewater generation of the project.<sup>1</sup>

Electrical power to the project site would continue to be provided by Southern California Edison via the existing infrastructure located along Camarillo Springs Road and Ridgeview Street. The existing overhead power lines along Ridge View Street would be under-grounded and the existing power poles would be removed. Natural Gas would be continuously provided to the project site by the Southern California Gas Company via an existing six-inch gas line infrastructure in the local vicinity.

The northern side of Ridge View Street along the frontage of the project site would be improved to its ultimate full width of 52 feet for the provision of two lanes in each direction from Margarita Avenue to Camarillo Springs Road.

#### **Construction Activities**

Construction of the proposed project is expected to occur over a period of approximately six years. However, during construction, the golf course is not anticipated to be closed for longer than seven months. The project applicant will be required to obtain coverage under the State General Construction NPDES Permit and as required by that permit prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to ensure proper erosion and sediment controls are imposed during construction activities. Creating the building pad for the proposed residences as well as removing the 154 existing mobile homes that are outside the project site from the mapped 100-year floodplain area would require the excavation and transfer of soils from other areas of the golf course and transferring the soils to the proposed residential area.<sup>2</sup> Grading and excavation is expected to occur over a period of approximately seven months. In all, approximately 875,000 cubic yards of soil would be graded to reshape the golf course and create the building pad area. There would not be any import or export of soil to or from the property. Earthwork is intended to balance onsite. The graded soil would be transferred within the property by scrapers and trucks. The proposed Tentative Tract map showing the proposed grading plan is illustrated in Figures 4-4 through 4-10. Larger maps may be reviewed at the City of Camarillo.

The soil that is excavated from the golf course - south area would be transported along an existing dirt access road located along the eastern side of Conejo Creek. This is a maintenance road for the VCWPD and it is also utilized for golf course maintenance vehicles. The maintenance road is approximately 20 feet in width at its narrowest points and more than 50 feet in width at the widest points. The maintenance

<sup>&</sup>lt;sup>1</sup> The new sewer line is proposed to accommodate existing wastewater flows and the increase associated with the proposed project. While there may be unused capacity remaining within the new sewer line, it is not proposed or sized to accommodate unplanned growth elsewhere within the service area of the Camarillo Sanitary District.

<sup>&</sup>lt;sup>2</sup> As discussed previously, 154 existing mobile homes would be removed from the 100-year floodplain but 22 lots Along Margarita Avenue immediately adjacent to the existing lake have existing ground below elevation 112.0 and, therefore, a portion of the lots would remain in the FEMA 100-year floodplain.

road would not need to be widened or improved to accommodate the project construction vehicles. VCWPD authorization would be required for using the "maintenance road" for project construction and dirt hauling.

Infrastructure improvements including sewer, water, storm drain, curb and gutter, dry utilities, and streets would occur over period of approximately seven months and be completed before the residential construction begins. The improvements to the golf course and its facilities would also occur during this time frame. Included in the infrastructure improvements is the proposed upsizing of the existing 12-inch VCP sewer line west of Conejo Creek to a 15-inch sewer line to accommodate to increased wastewater generation of the project. This underground infrastructure improvement would be constructed within an existing sewer line easement and result in the temporary disturbance of the easement area. Once the sewer line improvement has been completed, the easement area will be returned to its existing use, i.e., agricultural production.

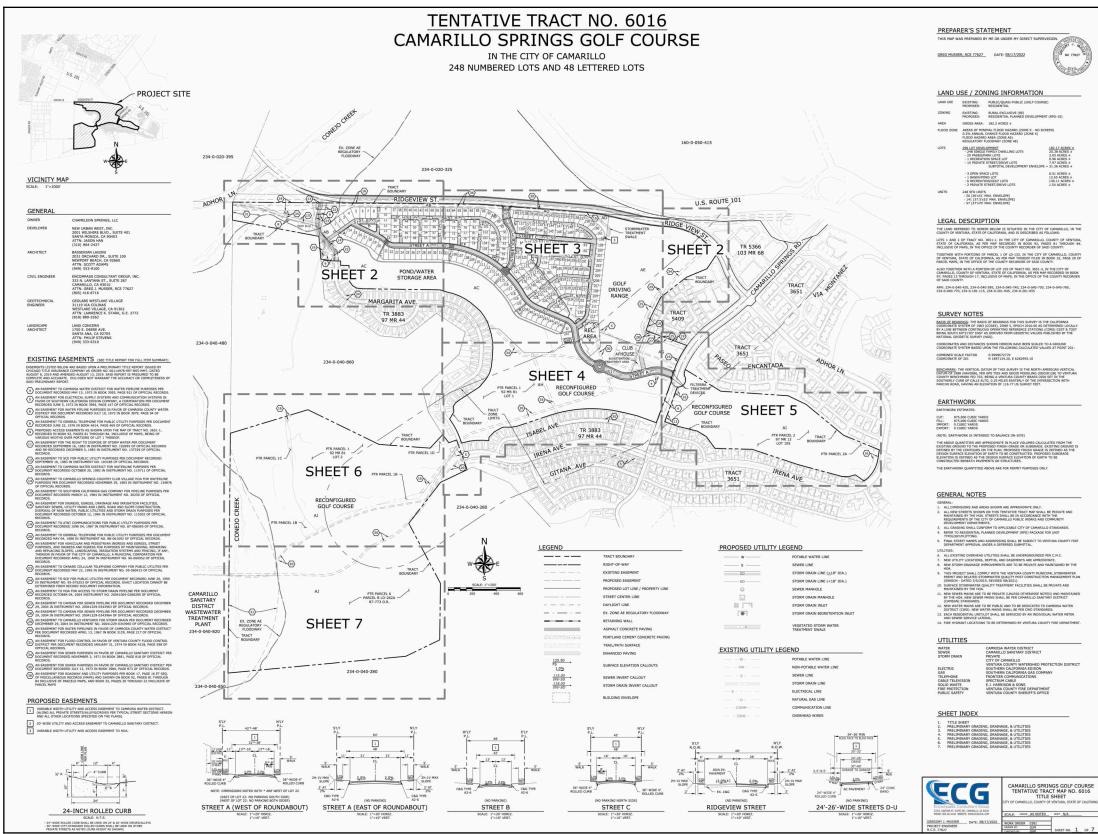
The new residences would be constructed in phases of approximately 16 units per phase. The first buildings constructed would be the residential recreation center, the home models, and the first phase of residences. Subsequent phases of residential construction would occur over periods of approximately five months based on market demand.

#### DISCRETIONARY ACTIONS AND APPROVALS

The City of Camarillo is the lead agency for the proposed project. This EIR is provided to address all discretionary actions associated with the development of the project including, but not limited to, the following:

- General Plan Amendment (GPA) 2017-2: The project applicant is requesting approval of GPA 2017-2 to change the General Plan land use designation for an approximate 31-acre portion of the property to Low-Medium Density Residential (5.1 10 dwelling units per acre).
- Change of Zone CZ-327: The project applicant is requesting approval of CZ-327 to change the zoning designation for an approximate 31-acre portion of the property from Rural Exclusive (RE) to RPD-8U (Residential Planned Development 8 units per acre maximum).
- **Tentative Tract Map TT-6016**: The project applicant is requesting approval of TT-6016 to subdivide the property for the development of up to 248 new age-restricted (55+) residential units.
- **Residential Planned Development RPD-204**: The project applicant is requesting approval of RPD-204 to permit low-medium density residential development totaling 248 units at the project site.
- **Special Use Permit Modification SUP-6M(3)**: The project applicant is requesting approval of SUP6M(3) to permit the reconfiguration of an existing 18-hole golf course into a 12-hole golf course.

FIGURE 4-4 - PROPOSED TRACT NO. 6016 (DATED AUGUST 17, 2022)



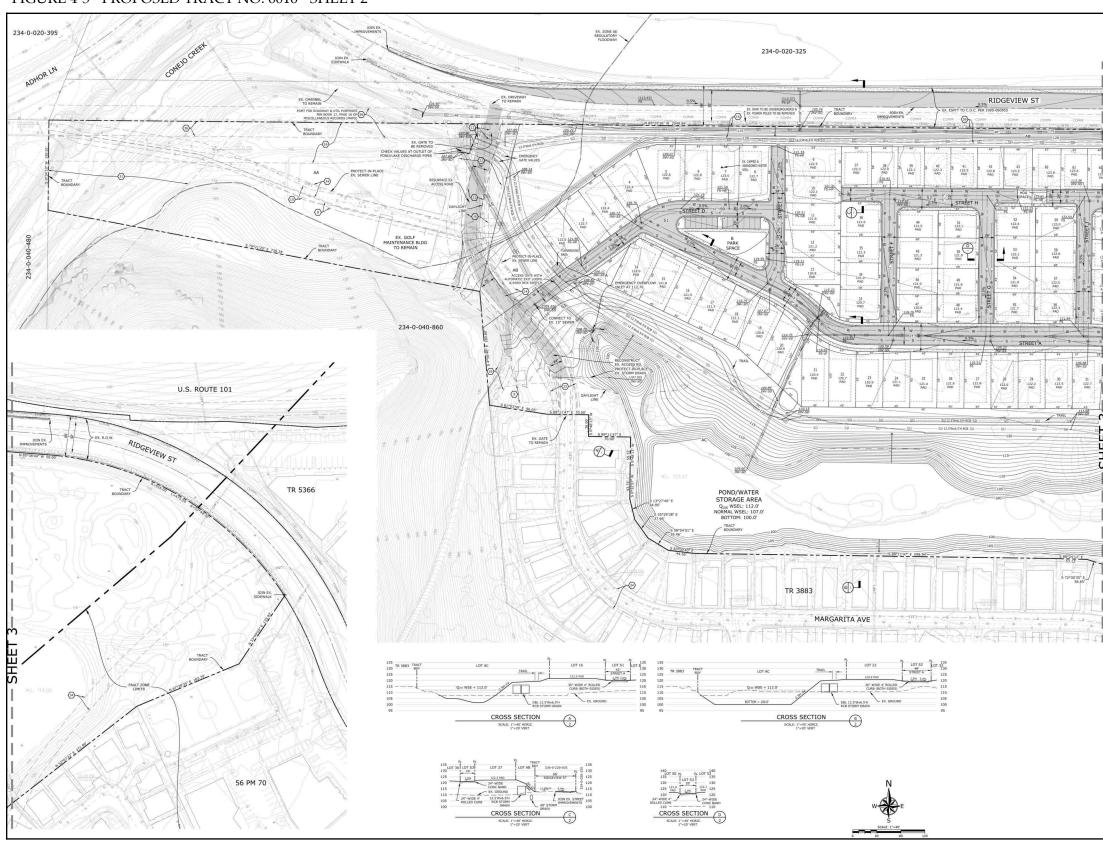


FIGURE 4-5 - PROPOSED TRACT NO. 6016 - SHEET 2

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FIGURE 4-6 - PROPOSED TRACT NO. 6016 - SHEET 3



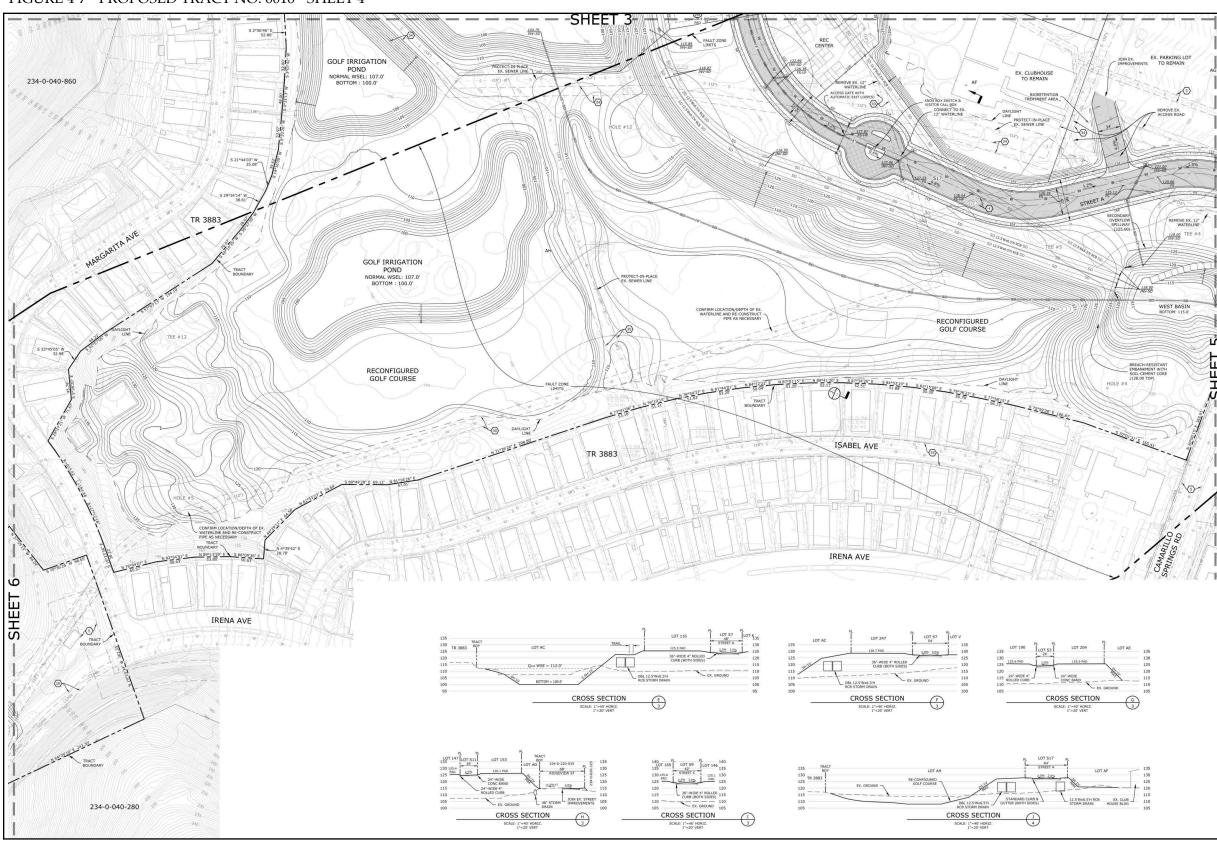


FIGURE 4-7 - PROPOSED TRACT NO. 6016 - SHEET 4

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FIGURE 4-8 - PROPOSED TRACT NO. 6016 - SHEET 5

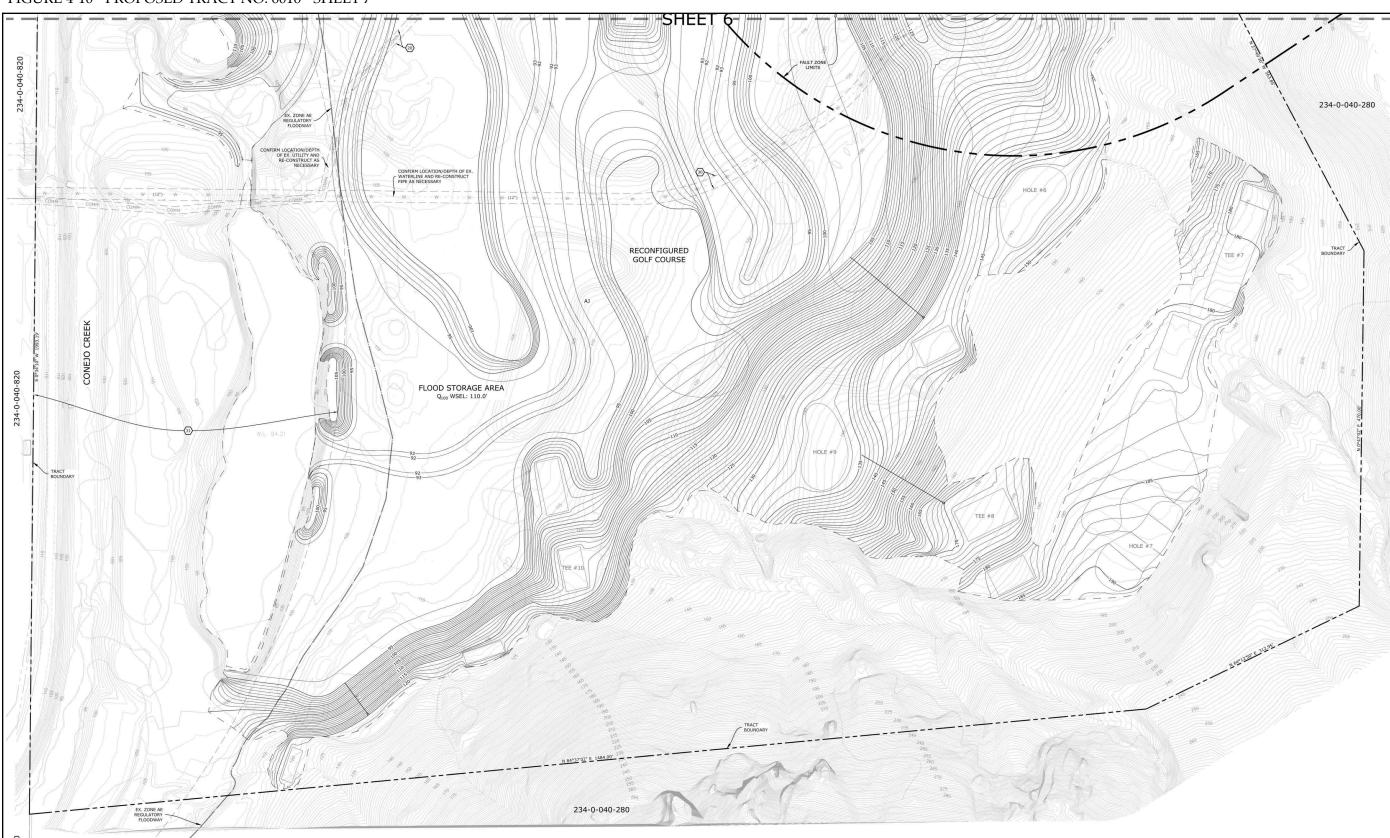


FIGURE 4-9 - PROPOSED TRACT NO. 6016 - SHEET 6



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FIGURE 4-10 - PROPOSED TRACT NO. 6016 - SHEET 7



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Approvals and permits that may be required by other agencies that would act as Responsible Agencies under CEQA, include:

- Review and approval by Los Angeles Regional Water Quality Control Board.
- Consultation, review and approval by the California Department of Fish and Wildlife.
- Review and approval by the United States Army Corps of Engineers
- Approval of a CLOMR and LOMR by FEMA to modify the existing FIRM.
- Approval of a Master Drainage Plan and Floodplain Analysis from the VCWPD.
- Approval of encroachment permits from the VCWPD.
- Review and approval by the Camrosa Water District of a water master plan related to potable water supply availability for the project.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the proposed project include:

- Review and approval of building permits by the Camarillo Building and Safety Department.
- Review and approval of grading permits, encroachment permits, and on- and off-site infrastructure improvements by the Camarillo Public Works Department and Community Development Department.
- Permit coverage will be required under the California State Water Resources Control Board General Construction NPDES Permit CAS000002, Order 2009-0009-DWQ as amended by Orders 2010-0014-DWQ and 2012-0006-DWQ for construction-related stormwater quality discharges.
- Approval by the Camarillo Public Works Department of a Post Construction Storm Water Management Plan (PCSMP) to mitigate post-construction stormwater flows produced by the project.

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# ENVIRONMENTAL IMPACT ANALYSIS FOR THE REVISED DRAFT EIR

This section is the primary component of the Revised Draft EIR as it provides a forecast of the probable future environment following the development of the proposed project. The purpose of this section is to inform readers about the type and magnitude of the potential environmental impacts associated with the proposed project, how such impacts would affect the existing environment, to identify mitigation measures which would reduce the magnitude of significant environmental impacts, and to identify cumulative impacts associated with development of the proposed project as well as other related projects.

#### **SECTION FORMAT**

This overall section is actually divided into six technical sections based on the modified Tentative Tract Map and the revised Master Drainage Plan and Floodplain Analysis as well as City staff directed updates. The six technical sections are as follows:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Wildfire

Each of these sections is organized into the six discussions, as follows:

- Summary
- Introduction
- Environmental Setting
- Thresholds of Significance
- Project Impacts and Mitigation Measures
- Cumulative Impacts

• Unavoidable Significant Impacts

Several sections also have an introduction discussion.

# AIR QUALITY

#### **SUMMARY**

Implementation of the proposed project would not conflict with or obstruct implementation of the 2022 Air Quality Management Plan.

Temporary, construction-related daily emissions generated during the project grading phase would exceed 25 pounds per day. Although this impact is not considered to be significant by the Ventura County Air Pollution Control District (VCAPCD), the VCAPCD recommends that mitigation be provided to reduce these emissions. The average daily emissions associated with project operational activities would not exceed the thresholds of significance recommended by the VCAPCD.

Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of carbon monoxide. However, implementation of the proposed project could expose sensitive receptors to substantial pollutant concentrations of construction-related fugitive dust and toxic air contaminants. Mitigation is identified to reduce these impacts to less than significant levels.

Implementation of the proposed project would not result in other emissions that create objectionable odors adversely affecting a substantial number of people.

#### **ENVIRONMENTAL SETTING**

## Air Quality Background

The City of Camarillo is located within the South Central Coast Air Basin (Basin), which includes all of Ventura, Santa Barbara, and San Luis Obispo Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources – (population centers, heavy vehicular traffic, and industry) – and meteorology.

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples are boilers or combustion equipment that produces electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbecue lighter fluid and hair spray. Mobile sources refer to emissions from motor vehicles, including

tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, agricultural equipment, racecars, and self-propelled construction equipment. Mobile sources account for the majority of the air pollutant emissions within the Basin. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and state governments establish ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health. The federal and state standards are set at levels at which concentrations could be generally harmful to human health and welfare, and to protect the most sensitive persons from illness or discomfort with a margin of safety. Applicable standards are identified below.

#### **Potential Health Effects of Air Pollutants**

Certain air pollutants are recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants are identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in the prevalent air quality.

The air pollutants for which national and State standards are promulgated and which are most relevant to air quality planning and regulation in the Basin include ozone, carbon monoxide (CO), respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. In addition, toxic air contaminants and greenhouse gas (GHG) emissions are of concern in the Basin. Each of these is described briefly below.

**Ozone** is a gas that is formed when reactive organic compounds (ROC) and nitrogen oxides (NOx)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

An elevated level of ozone irritates the lungs and breathing passages, causing coughing, and pain in the chest and throat thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Carbon Monoxide is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source

of CO in the Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of moderate levels of carbon monoxide can cause nausea, dizziness, and headaches, and can be fatal at high concentrations.

Respirable Particulate Matter (PM<sub>10</sub>) and Fine Particulate Matter (PM<sub>2.5</sub>) consists of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. In agricultural areas such as Ventura County, large amount of airborne particulates are generated by plowing and other field work. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

The human body naturally prevents the entry of larger particles into the body. However, PM<sub>10</sub> and even smaller PM<sub>2.5</sub> are trapped in the nose, throat, and upper respiratory tract. These small particulates enter the body and could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM<sub>10</sub> and PM<sub>2.5</sub>. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulate could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

**Nitrogen Dioxide** (NO<sub>2</sub>) is byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NOx. NO<sub>2</sub> absorbs blue light and its result is a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> also contributes to the formation of  $PM_{10}$ .

Major sources of NOx include power plants, large industrial facilities, and motor vehicles. Nitrogen oxides irritate the nose and throat. It increases susceptibility to respiratory infections, especially in people with asthma. The principal concern of NOx is as a precursor to the formation of ozone.

**Sulfur Dioxide** (SO<sub>2</sub>) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries.

Major sources of SO<sub>2</sub> include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of

particulate appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

**Lead** occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles so most such combustion emissions are associated with off-road vehicles such as racecars. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters.

Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

**Toxic Air Contaminants** (TACs) refer to a diverse group of air pollutants that can affect human health, but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional.

Other pollutants of concern in Ventura County include San Joaquin Valley Fever, odors, and fugitive dust. Each of these is described briefly below.

San Joaquin Valley Fever (formally known as Coccidioidomycosis) is an infectious disease caused by the fungus Coccidioides immitis. San Joaquin Valley Fever is also known as Valley Fever, Desert Fever, or Cocci. Infection is caused by inhalation of Coccidioides immitis spores that have become airborne when dry, dusty soil or dirt is disturbed by wind, construction, farming, or other activities such as fire and earthquakes. The Valley Fever fungus tends to be found at the base of hillsides, in virgin, undisturbed soil. It usually grows in the top few inches of soil but can grow down to 12 inches. The fungus does not survive well in highly populated areas because there is not usually enough undisturbed soil for the fungus to grow. Additionally, the fungus is not likely to be found in soil that has been or is being cultivated and fertilized. This is because manmade fertilizers, such as ammonium sulfate, enhance the growth of the natural microbial competitors of the Valley Fever fungus. Infection is most frequent during summers that follow a rainy winter or spring, especially after wind and dust storms. Valley Fever infection is common only in arid and semiarid areas of the Western Hemisphere. In the United States, it is mostly found from Southern California to southern Texas. In Ventura County, the Valley Fever fungus is most prevalent in the county's dry, inland regions such as Simi Valley, Piru, and Fillmore.

In its primary form, symptoms appear as a mild upper respiratory infection, acute bronchitis, or pneumonia. The most common symptoms are fatigue, cough, chest pain, fever, rash, headache, and joint aches, although 60 percent of people infected are asymptomatic and do not seek medical attention. In the remaining 40 percent, symptoms range from mild to severe. A small percentage, less than one percent, die as a result of the disease.

The average number of reported new cases of Valley Fever in Ventura County before 1994 was 40 per year. In 1994, the year of the Northridge earthquake, the number of reported new cases of Valley Fever was 243. This increase was attributed to the great quantities of airborne dust generated by the Northridge earthquake. Since 1995, the number of reported cases has been comparable to the average before 1994. However, the actual number of cases may be much higher because Valley Fever is often misdiagnosed as the flu and not reported by physicians. Cases of Valley Fever recently increased in Ventura County following the Thomas Fire in 2017 and the Woolsey Fire in 2018.

**Odors** are substances in the air that pose a nuisance to nearby land uses such as residences, schools, daycare centers, and hospitals. Odors are typically not a health concern, but can interfere with the use and enjoyment of nearby property.

Odors may be generated by a wide variety of sources. The following are examples of facilities and operations that may generate significant odors:

- Wastewater treatment facilities
- Sanitary landfills
- Transfer stations
- Composting facilities
- Asphalt batch plants
- Painting and coating operations
- Fiberglass operations
- Food processing facilities
- Feed lots/ dairies
- Petroleum extraction, transfer, processing, and refining operations and facilities
- Chemical manufacturing operations and facilities
- Rendering plants

## **Regulatory Setting**

Air quality within the Basin is addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the Basin are discussed below.

#### Federal Regulations

The federal Clean Air Act (CAA) establishes national ambient air quality standards. Under the CAA, the U.S. Environmental Protection Agency (U.S. EPA) is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities under the CAA, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

#### California Regulations

The California Clean Air Act (CCAA) requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (ARB), a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the ARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Appendix E to this EIR includes the CAAQS currently in effect for each of the criteria pollutants as well as other pollutants recognized by the State. As shown in Appendix E, the CAAQS includes more stringent standards than the national ambient air quality standards.

Although not originally intended to specifically reduce air pollutant emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2019 Title 24 standards (effective as of January 1, 2020) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California

Code of Regulations, Title 24, Part 11). The indoor and outdoor water use standards of the CALGreen Code are already addressed by the Camrosa Water District's Water Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new residential and non-residential developments proposed for the project site are as follows:

#### Residential Uses

- Division 4.1 Planning and Design
  - Section 4.106 Site Development
    - 4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, 4.106.4.2, or 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625.
    - 4.106.4.1 New one- and two-family dwellings and townhouses with attached garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or sub panel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or sub panel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a brach circuit overcurrent protective device.
- Division 4.4 Material Conservation and Resource Efficiency
  - Section 4.408 Construction Waste Reduction, Disposal and Recycling
    - 4.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.
    - 4.408.2 Construction waste management plan. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.
      - 1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.

- 2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
- 3. Identify diversion facilities where the construction and demolition waste material will be taken.
- 4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.
- 5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, or both.
- 4.408.3 Waste management company. Utilize a waste management company, approved by the
  enforcing agency, which can provide verifiable documentation that the percentage of
  construction and demolition waste material diverted from the landfill complies with Section
  4.408.1.
- 4.408.4 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 3.4 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
  - 4.408.4.1 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
- Section 4.410 Building Maintenance and Operation
  - 4.410.1 Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - 1. Directions to the owner or occupant that the manual shall remain with the building throughout the lifecycle of the structure.
    - 2. Operation and maintenance instructions for the following:
      - a. Equipment and appliances, including water saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
      - c. Space conditioning systems, including condensers and air filters.

- 3. Information from local utility, water and waste recovery providers on methods to reduce resource consumption, including recycle programs and locations.
- 4. Public transportation and/or carpool options available in the area.
- 9. Information about state solar energy and incentive programs available.
- 10. A copy of all special inspection verifications required by the enforcing agency or this code.
- Division 4.5 Environmental Quality
  - Section 4.504 Pollutant Control
    - 4.504.2 Finish material pollutant control. Finish materials shall comply with this section.
    - 4.504.2.1 Adhesives, sealants and caulks. Adhesives, sealants and caulks used in the project shall meet the requirements of the following standards unless more stringent local or regional air pollution or air quality management district rules apply:
      - 1. Adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, and caulks shall comply with local or regional air pollution control or air quality management district rules where applicable or SCAQMD Rule 1168 VOC limits, as shown in Table 4.504.1 or 4.504.2, as applicable. Such products shall also comply with the Rule 1168 prohibition on the use of certain toxic compounds (chloroform, ethylene dichloride, methylene chloride, perchloroethylene and trichloroethylene), except for aerosol products, as specified in Subsection 2 below.
      - 2. Aerosol adhesives, and smaller unit sizes of adhesives, and sealant or caulking compounds (in units of product, less packaging, which do not weigh more than 1 pound and do not consist of more than 16 fluid ounces) shall comply with statewide VOC standards and other requirements, including prohibitions on use of certain toxic compounds, of California Code of Regulations, Title 17, commencing with Section 94507.
    - 4.504.2.2 Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the ARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty costings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat or Nonflat-high Gloss coating, based on its gloss, as defined in Subsections 4.21, 4.36, and 4.37 of the 2007 California Air Resources Board, Suggested Control Measure, and the corresponding Flat, Nonflat or Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

• 4.504.2.3 Aerosol paints and coatings. Aerosol paints and coatings shall meet the Product-weighted MIR Limits for ROC in Section 94522(a)(2) and other requirements, including prohibitions on use of certain toxic compounds and ozone depleting substances, in Sections 94522(e)(1) and (f)(1) of California Code of Regulations, Title 17, commencing with Section 94520.

#### Nonresidential Uses

- Division 5.1 Planning and Design
  - Section 5.106 Site Development
    - 5.106.12 Shade Trees. Shade trees shall be planted to comply with Sections 5.106.12.1, 5.106.12.2, and 5.106.12.3. Percentages shown shall be measured at noon on the summer solstice. Landscape irrigation necessary to establish and maintain tree health shall comply with Section 5.304.6.
      - 5.106.12.1 Surface parking areas. Shade tree plantings, minimum #10 container size or equal shall be installed to provide shade over 50 percent of the parking area within 15 years.
- Division 5.4 Material Conservation and Resource Efficiency
  - Section 5.408 Construction Waste Reduction, Disposal and Recycling
    - 5.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
      - 5.408.1.1 Construction waste management plan. Where a local jurisdiction does not have a construction and demolition waste management ordinance that is more stringent, submit a construction waste management plan that:
        - 1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient useage, recycling, reuse on the project or salvage for future use or sale.
        - 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
        - 3. Identifies diversion facilities where the construction and demolition waste material will be taken.

- 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.
- 5.408.1.2 Waste management company. Utilize a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with this section.
- 5.408.1.3 Waste stream reduction alternative. The combined weight of new construction disposal that does not exceed two pounds per square foot of the building area shall meet the minimum 65 percent minimum requirement as approved by the enforcing agency.
- 5.408.3 Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Section 5.410 Building Maintenance and Operation
  - 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.
- Division 5.5 Environmental Quality
  - Section 5.504 Pollutant Control
    - 5.504.4 Finish material pollutant control. Finish materials shall comply with Section 5.504.4.1 through 5.504.4.6.
    - 5.504.4.1 Adhesives, sealants and caulks. Adhesives, sealants and caulks used on the project shall meet the requirements of the following standards:
      - 1. Adhesives, adhesive bonding primers, sealants, sealant primers and caulks shall comply with local or regional air pollution control or air quality management district rules where applicable, or SCAQMD Rule 1168 VOC limits, as shown in Tables 5.504.4.1 and 5.504.4.2. Such products shall also comply with the Rule 1168 prohibition on the use of certain toxic compounds (chloroform, ethylene dichloride, methylene chloride, perchloroethylene and trichloroethylene), except for aerosol products, as specified in Subsection 2 below.
      - 2. Aerosol adhesives, and smaller unit sizes of adhesives, and sealant or caulking compounds (in units of product, less packaging, which do not weigh more than one pound and do not consist of more than 16 fluid ounces) shall comply with statewide VOC

standards and other requirements, including prohibitions on use of certain toxic compounds, of California Code of Regulations, Title 17, commencing with Section 94507.

- 5.504.4.3 Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the ARB Architectural Suggested Control Measure, as shown in Table 5.504.4.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty costings categories listed in Table 5.504.4.3 shall be determined by classifying the coating as a Flat, Nonflat or Nonflat-high Gloss coating, based on its gloss, as defined in Subsections 4.21, 4.36, and 4.37 of the 2007 California Air Resources Board, Suggested Control Measure, and the corresponding Flat, Nonflat or Nonflat-high Gloss VOC limit in Table 5.504.4.3 shall apply.
  - 4.504.4.3.1 Aerosol paints and coatings. Aerosol paints and coatings shall meet the PWMIR Limits for ROC in Section 94522(a)(3) and other requirements, including prohibitions on use of certain toxic compounds and ozone depleting substances, in Sections 94522(c)(2) and (d) (2) of California Code of Regulations, Title 17, commencing with Section 94520.

Diesel engines emit a complex mixture of pollutants, including very small carbon particles, or "soot" coated with numerous organic compounds, known as diesel particulate matter (DPM). Diesel exhaust also contains more than 40 cancer-causing substances, most of which are readily adsorbed onto the soot particles. In 1998, the ARB identified DPM as a TAC based on its potential to cause cancer.

## Regional Regulations

The Ventura County Air Pollution Control District (VCAPCD) is the agency principally responsible for comprehensive air pollution control in the Ventura County portion of the Basin. To that end, the VCAPCD, a regional agency, works directly with the Southern California Association of Governments (SCAG), the Ventura County Transportation Commission, and local governments, and cooperates actively with all State and federal government agencies. The VCAPCD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The VCAPCD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the VCAPCD on December 13, 2022. This AQMP, referred to as the 2022 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It identifies the control measures that will be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased

the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the County.

The future air quality levels projected in the 2022 AQMP are based on several assumptions. For example, the VCAPCD assumes that general new development within the County will occur in accordance with population growth and transportation projections identified by County staff.

Although the VCAPCD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within the county. Instead, the VCAPCD has used its expertise and prepared the Ventura County Air Quality Assessment Guidelines to indirectly address these issues in accordance with the projections and programs of the AQMP. The purpose of the Ventura County Air Quality Assessment Guidelines is to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the county. Specifically, the Ventura County Air Quality Assessment Guidelines explains the procedures that the VCAPCD recommends be followed during environmental review processes required by CEQA. The Ventura County Air Quality Assessment Guidelines provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The VCAPCD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the County, and adverse impacts will be minimized.

#### Local Air Quality Control

Local jurisdictions, such as the City of Camarillo, have the authority and responsibility to reduce air pollution through its police powers and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Camarillo is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

In accordance with CEQA and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies upon the expertise of the VCAPCD and utilizes the Ventura County Air Quality Assessment Guidelines as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

# **Existing Regional Air Quality**

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. Exhaust emissions from mobile sources generate the majority of ROC, NOx, and CO in the Basin and Ventura County. Area-wide sources generate the most airborne particulates (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>).

Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the ARB to assess and classify the air quality of each regional air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment" for that pollutant. If the pollutant concentration meets or exceeds the standard (depending on the specific standard for the individual pollutants), the area is classified as a "nonattainment" area.¹ If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified."

The U.S. EPA and the ARB use different standards for determining whether an air basin or county is an attainment area. Under national standards, Ventura County is currently classified as a moderate nonattainment area for 8-hour ozone concentrations. Ventura County is in attainment or designated as unclassified for all other pollutants under national standards. Under state standards, Ventura County is designated as a nonattainment area for ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, and an attainment area for all other pollutants.

# **Existing Local Air Quality**

The VCAPCD monitors ambient air pollutant concentrations through a series of monitoring stations located throughout the County. These stations are located in El Rio, Ojai, Piru, Simi Valley, and Thousand Oaks. The closest monitoring station to the City of Camarillo and most representative of the ambient air quality in the City is the El Rio station.

California Ambient Air Quality Standards for ozone, CO, SO<sub>2</sub> (1- and 24-hour), NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles are values that are not to be exceeded. Standards for all other pollutants are not to be equaled or exceeded.

<sup>&</sup>lt;sup>1</sup> National Ambient Air Quality Standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average above the standard is less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

Table 5.2-1 identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at the El Rio monitoring station through the period 2019 to 2021, which is the most recent data available from the ARB.

TABLE 5.2-1 - LOCAL AMBIENT AIR QUALITY

F.,		Year						
Emissions Source	2019	2020	2021					
Ozone								
Maximum 1-hour concentration measured	0.078 ppm	0.104 ppm	0.073 ppm					
Days exceeding state 0.090 ppm 1-hour standard	0	2	0					
Maximum 8-hour concentration measured	0.070 ppm	0.086 ppm	0.067 ppm					
Days exceeding national and state 0.070 ppm 8-hour standard	0	3	0					
Respirable Particulate Matte	Respirable Particulate Matter (PM <sub>10</sub> )							
Maximum 24-hour concentration measured	187.8 μg/m <sup>3</sup>	200.7 μg/m <sup>3</sup>	377.8 μg/m <sup>3</sup>					
Measured days exceeding national 150 μg/m³ 24-hour standard	2	2	1					
Measured days exceeding state 50 μg/m³ 24-hour standard	14	21	12					
Fine Particulate Matter (F	PM <sub>2.5</sub> )		•					
Maximum 24-hour concentration measured	$25.5 \mu g/m^3$	58.7 μg/m <sup>3</sup>	$31.7 \mu g/m^3$					
Measured days exceeding national 35 $\mu g/m^3$ 24-hour standard	0	3	0					
Nitrogen Dioxide (NC	02)							
Maximum 1-hour concentration measured	41.0 ppb	31.0 ppb	33.0 ppb					
Days exceeding national 100 ppb 1-hour standard	0	0	0					

ppm = parts per million by volume.

 $\mu$ g/m<sup>3</sup> = micrograms per cubic meter.

\* = insufficient data to determine the value.

ppb = parts per billion by volume.

Source of table data: California Air Resources Board, iADAM: Air Quality Data Statistics, May 2023.

Existing land-uses surrounding the golf course property are limited to residential, commercial, office, and agricultural uses. Air pollutant emissions are generated in the local vicinity by stationary sources and mobile sources, primarily automobile and truck traffic. Motor vehicles are the primary source of pollutants in the local vicinity.

# **Existing Project Site Emissions**

Camarillo Springs Golf Course is a 182-acre, privately-owned facility that has been developed and operational for more than 45 years. The property is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures.

The daily operational emissions associated with the existing golf course have been estimated utilizing the California Emissions Estimator Model (CalEEMod v. 2022.1) and the trip generation data from the project Traffic and Circulation Study as recommended by the VCAPCD. The estimated average existing daily emissions associated with the golf course are presented in Table 5.2-2.

TABLE 5.2-2 - ESTIMATED EXISTING DAILY OPERATIONAL EMISSIONS

Emissions Source	Emissions in Pounds Per Day							
Emissions Source	ROC	NOx	СО	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>		
Area Sources	4.7	0.0	0.0	0.0	0.0	0.0		
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0		
Mobile Sources	3.0	3.3	25.7	0.6	2.0	0.4		
Total Emissions	7.7	3.3	25.7	0.6	2.0	0.4		

CalEEMod result sheets are provided in Appendix E.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant air quality impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- 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.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The thresholds discussed below are currently recommended by the VCAPCD in the Ventura County Air Quality Assessment Guidelines to translate the State CEQA Guidelines thresholds into numerical values or performance standards. As discussed previously in this EIR section, the City of Camarillo utilizes the

Ventura County Air Quality Assessment Guidelines as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

# Consistency with the 2022 AQMP

The VCAPCD Ventura County Air Quality Assessment Guidelines states that any general plan amendment that will result in population growth above that forecasted in the most recently adopted AQMP is inconsistent with the AQMP. This is because the projected growth rate in population is used as an indicator of future emissions from population-related emission categories in the AQMP. Inconsistency with these projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered a significant cumulative adverse air quality impact.

# **Cumulatively Considerable Increases in Emissions**

## Operational Emissions – Daily Regional Emissions of ROC and NOx

The VCAPCD currently recommends that projects located everywhere in Ventura County outside of the Ojai Planning Area with operational emissions that exceed any of the following emissions thresholds should be considered to have significant individual project and cumulatively considerable impacts:

- 25 pounds per day of ROC
- 25 pounds per day of NOx

The VCAPCD Ventura County Air Quality Assessment Guidelines state that these thresholds are only applied to unpermitted sources of emissions. Emissions from equipment requiring VCAPCD permits, specifically stationary equipment, are not counted towards these air quality significance thresholds.

#### **Construction Period Emissions**

Page 5-3 of the Ventura County Air Quality Assessment Guidelines states that the construction-related emissions are not counted towards the two 25 pounds per day thresholds for ROC and NOx since these emissions are temporary. Instead, the VCAPCD recommends that construction emissions be quantified and mitigated if the emissions would exceed one or both of the 25 pounds per day thresholds for ROC and NOx. If all appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant.

## **Exposure of Sensitive Receptors to Substantial Pollutant Concentrations**

The VCAPCD currently recommends that project-specific, localized, and non-ozone impacts to sensitive receptors be considered significant if any of the following occur:

- The project generates increased emissions of construction-related and operational emissions of fugitive dust and does not implement fugitive dust programs consistent with VCAPCD rules and regulations.
- The project could expose people to San Joaquin Valley Fever fungus.
- The project generates an increase in local traffic volumes that causes localized CO concentrations at sensitive receptors near congested intersections to exceed State ambient air quality standards.
- The project generates an increase in toxic air contaminants that causes a lifetime probability of contracting cancer of more than 10 in one million or results in a Hazard Index of greater than 1.

# PROJECT IMPACTS AND MITIGATION MEASURES

# Consistency with the 2022 AQMP

**Threshold**: Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?

**Impact**: Implementation of the proposed project would not conflict with or obstruct implementation of the 2022 AQMP.

# Impact Analysis

As discussed in the Population and Housing section of this EIR, the City of Camarillo has an estimated January 1, 2020 population of approximately 70,261 persons. Assuming that each of the proposed agerestricted (55+) single family detached dwelling units has two residents, the project would increase the City's population by up to 496 persons. This is a conservative estimate since some of the homes would be expected to be occupied by only one person. When added to the existing population of Camarillo, the total of 70,757 residents would not exceed SCAG's 2040 growth forecast of 79,900 persons for the City of Camarillo. Therefore, the proposed project would not directly induce substantial population growth within the City of Camarillo that has not already been anticipated by the City and SCAG. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and the potential impact would be less than significant.

# **Cumulatively Considerable Increases in Emissions**

**Threshold**: Would the proposed project 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?

**Impact**: Temporary, construction-related daily emissions of NOx generated during the project grading phase would exceed 25 pounds per day. Although this impact is not considered to be significant by the

VCAPCD, the VCAPCD recommends that mitigation be provided to reduce these emissions. The average daily emissions associated with project operational activities would not exceed the thresholds of significance recommended by the VCAPCD.

#### **Impact Analysis**

#### **Construction-Related Emissions**

The analysis of mass daily regional construction emissions has been prepared utilizing CalEEMod as recommended by the VCAPCD. The default construction dates in CalEEMod were changed to reflect the proposed construction schedule. The default equipment and amounts listed in CalEEMod for the grading and infrastructure phases were modified to reflect the equipment anticipated by the applicant. The changes to the default equipment are identified in Table 5.2-3.

TABLE 5.2-3 - PROJECT CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Phase	Equipment	CalEEMod Default	Project Assumptions
	Excavators	2	1
	Graders	1	2
Con the	Rubber Tired Dozers	1	2
Grading	Scrapers	2	16
	Tractors/Loaders/Backhoes	2	7
	Off-Highway Trucks	0	5
	Excavators	0	1
Infrastructure	Scrapers	0	1
	Tractors/Loaders/Backhoes	0	1

In applying the Ventura County Air Quality Assessment Guidelines, "construction-related ROC and NOx emissions are not counted towards the ROC and NOx significance thresholds, since these emissions are only temporary." (See Ventura County Air Quality Assessment Guidelines, p. 7-5.) However, "construction-related emissions should be mitigated if estimates of ROC and NOx emissions from the heavy-duty construction equipment anticipated to be used for a particular project exceed... the 25 pounds per day threshold...." (*Id.* at p. 5-4.) However, the Ventura County Air Quality Assessment Guidelines do not require that mitigation bring construction emissions to below 25 pounds per day – only that mitigation reduce construction emissions to the extent feasible. The Ventura County Air Quality Assessment Guidelines acknowledge that "there are very few feasible measures available to reduce these emissions."

The mass daily construction-related emissions for the proposed project are shown in Table 5.2-4. As shown, the maximum daily emissions of NOx generated during the site grading phase would exceed 25 pounds per day. The emissions generated during the other phases of development would not exceed any recommended thresholds of significance. Thus, mitigation should be provided to reduce these emissions.

TABLE 5.2-4 - ESTIMATED MASS DAILY CONSTRUCTION EMISSIONS

Emissions Source Year	Emissions in Pounds Per Day							
Emissions Source fear	ROC	NOx	СО	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>		
Grading	17.2	202.0	141.7	0.3	20.1	9.8		
Infrastructure	1.1	10.3	9.6	<0.1	0.5	0.4		
Paving	2.0	7.5	10.8	<0.1	0.5	0.3		
Building Construction	4.1	24.9	39.0	<0.1	3.3	1.4		
Architectural Coatings	1.7	1.0	3.4	<0.1	0.5	0.1		
Maximum Daily Emissions	17.2	202.0	141.7	0.3	20.1	9.8		

The emissions shown in this table are the combined unmitigated on-site and off-site construction emissions totals shown in the CalEEMod results sheets for each phase. The building construction and architectural coatings emissions are for 2025, which is the higher of the five years that were calculated for these phases.

The CalEEmod calculations assume the standard statewide engine tiers for the construction equipment operating at the site. The calculations do not assume the use of or requirement for newer engines that meet more stringent USEPA standards. This provides a more conservative analysis of potential construction-related air pollutant emissions.

CalEEMod result sheets are provided in Appendix E.

#### **Operational Emissions**

Operational emissions generated by both stationary and mobile sources would result from normal dayto-day activities within the project site after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and the occasional application of architectural coatings. Mobile emissions would be generated by the motor vehicles traveling to and from the project site.

The analysis of daily operational emissions has been prepared utilizing CalEEMod as recommended by the VCAPCD and the assumption that the project would be completed and fully operational by 2029 (development in years later than 2029 may result in lower emissions). The results of these calculations are presented in Table 5.2-5. As shown, the proposed project would generate average daily operational emissions that do not exceed the thresholds of significance recommended by the VCAPCD. This would be a less than significant impact.

TABLE 5.2-5 - ESTIMATED MASS DAILY OPERATIONAL EMISSIONS

Emissions Source	Emissions in Pounds Per Day							
Emissions Source	ROC	NOx	СО	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>		
Area Sources	10.7	0.0	14.1	<0.1	<0.1	<0.1		
Energy Sources	0.1	1.1	0.5	<0.1	0.1	0.1		
Mobile Sources	6.7	5.7	51.4	0.1	5.6	1.1		
Total Emissions	17.5	6.9	66.0	0.2	5.7	1.2		
VCAPCD Thresholds of Significance	25.0	25.0	NT	NT	NT	NT		
Significant Impact?	No	No	No	No	No	No		

The operational emissions shown in this table are the mitigated overall operational emissions totals shown in the CalEEMod results sheets, which assume building energy efficiency as required by Title 24 and the CalGreen Code.

NT = The VCAPCD has not recommended a regional daily threshold of significance for these pollutants.

CalEEMod result sheets are provided in Appendix E.

## Mitigation

As described above, the proposed project would result in temporary, construction-related impacts associated with NOx emissions. The following mitigation measure is identified to reduce the construction-related NOx emissions from heavy-duty construction equipment to the maximum extent feasible:

- AQ-1 As recommended by the VCAPCD's Air Quality Assessment Guidelines, the project developer shall include in construction contracts the following control measures:
  - Maintain equipment engines in good condition and in proper tune as per manufacturer's specifications.
  - Limit truck and equipment idling time to five minutes or less.
  - Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October).
  - Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent feasible.
  - Heavy equipment used for grading and utilities installation shall use engines with a minimum diesel rating of Tier 3 with diesel oxidation catalysts, level 3 diesel particulate filters that reduce

particulate matter by at least 85 percent, and meet the latest ARB best available control technology.

Pages 17 and 19 of the proposed project CalEEMod result sheets provided in Appendix E indicate that the use of Tier 3 engines would reduce the temporary construction-related daily emissions of NOx from 168 ppd to 162 ppd during the grading phase.

## Mitigation Monitoring

The Department of Community Development shall review project construction contracts prior to issuance of grading permits to ensure that the contracts include the requirements of mitigation measure AQ-1.

## **Impact After Mitigation**

As discussed previously, the Ventura County Air Quality Assessment Guidelines do not require that mitigation bring construction emissions to below 25 pounds per day – only that mitigation reduce construction emissions to the extent feasible. If all appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant. Mitigation measure AQ-1 would reduce the construction-related NOx emissions from heavy-duty construction equipment to the maximum extent feasible. Therefore, mitigation measure AQ-1 would reduce the construction-related impact of the project to a less than significant level.

# **Exposure of Sensitive Receptors to Substantial Pollutant Concentrations**

**Threshold**: Would the proposed project expose sensitive receptors to substantial pollutant concentrations?

**Impact**: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations of carbon monoxide. However, implementation of the proposed project could expose sensitive receptors to substantial pollutant concentrations of construction-related fugitive dust and toxic air contaminants. Mitigation is identified to reduce these impacts to less than significant levels.

## Impact Analysis

#### **Fugitive Dust**

Fugitive dust would be generated during project construction activities; primarily during the site grading phase. As shown previously in Table 5.2-4, the anticipated daily emissions of  $PM_{10}$  would range from 0.5 ppd during construction infrastructure paving activities to 20.1 ppd during grading activities. Also as shown in Table 5.2-4, the anticipated daily emissions of  $PM_{2.5}$  would range from 0.3 ppd during architectural coating activities and 9.8 ppd during grading activities. The VCAPCD does not recommend any thresholds of significance for fugitive dust emissions. Instead, the VCAPCD bases the determination

of significance on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant. Further, fugitive dust emissions are addressed through VCAPCD Rule 55, which applies to any operation or disturbed surface area capable of generating fugitive dust. As such, Mitigation Measure AQ-2 has been identified to address any potentially significant impacts associated with fugitive dust and particulate matter emissions.

# San Joaquin Valley Fever

The Ventura County Air Quality Assessment Guidelines state that there is no recommended threshold for a significant San Joaquin Valley Fever impact. (See Ventura County Air Quality Assessment Guidelines, p. 6-3.) However, listed below are factors that may indicate a project's potential to create significant Valley Fever impacts:

- Disturbance of the top soil of undeveloped land (to a depth of about 12 inches)
- Dry, alkaline, sandy soils.
- Virgin, undisturbed, non-urban areas.
- Windy areas.
- Archaeological resources probable or known to exist in the area (Native American midden sites).
- Special events (fairs, concerts) and motorized activities (motocross track, All Terrain Vehicle activities) on unvegetated soil (non-grass).
- Non-native population (i.e., out-of-area construction workers).

The majority of the project site is presently developed with an active golf course and, as discussed previously, the fungus is not likely to be found in soil that has been or is being cultivated and fertilized. This is because manmade fertilizers, such as ammonium sulfate, enhance the growth of the natural microbial competitors of the Valley Fever fungus. The area of the project site that has undeveloped land is located in the southern area of the site. This area would be excavated to provide soils for the proposed residential area and the boundary of the landscaped golf course in this area of the site would be expanded beyond its existent area. The soils in this area of the site are classified as HaG - Hambright very rocky loam, 15 to 75 percent slopes, HbF - Hambright rocky clay loam, 30 to 50 percent slopes, IrG - Igneous rock land, VaC - Vina loam, 2 to 9 percent slopes, VnC - Vina gravelly loam, 2 to 9 percent slopes, and VsC - Vina silty clay loam, 2 to 9 percent slopes. These are not sandy soils and the Hambright series are moderately acidic while the Vina series have a neutral pH. As such, they do not support the preferred environmental for Valley Fever spores and the potential risk to residents near the project site to be exposed to Valley Fever spores during earth moving activities at the project site is not considered to be

potentially significant. The potential for dust containing Valley Fever spores to be generated during construction would be controlled by the fugitive dust control requirements of VCAPCD Rule 55 and mitigation measure AQ-2.

#### **Localized Carbon Monoxide Concentration**

Traffic-congested roadways and intersections have the potential to generate localized concentrations levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO "hotspots."

CO hotspots used to be a concern in Ventura County when this area was designated as a nonattainment area for State and national CO standards. The county is now in attainment of all applicable State and national standards for CO and CO concentrations are no longer monitored in the county. This is due to substantial reductions in CO emissions from motor vehicles. The greatest potential for a CO hotspot to occur in Ventura County today is at the roadway edge of a very congested intersection.

In order for a receptor to be exposed to a CO hotspot, that person would have to remain in a location where the total CO concentration exceeds the State and national eight-hour standard for an entire eight-hour period or greater. For that to occur, the ambient (background) CO concentration would have to be very high and an intersection would have to be highly congested for a period of eight-hours or greater.<sup>2</sup>

As discussed in the Transportation section of this EIR, all of the study-area intersections are projected to operate at Level of Service (LOS) A or B in the future with the traffic generated by other development projects in the area and the proposed project. As such, no sensitive receptors in the vicinity of the study-area intersections would be exposed to CO hotspots in the future with traffic generated by the proposed project and the potential impact would be less than significant.

## **Toxic Air Contaminants**

The project is a residential and redeveloped golf course project, and would not be a new source of operational toxic air contaminants. However, as the project is large, the City of Camarillo requested that a construction-based health risk assessment be conducted. Therefore, for informational and public disclosure purposes, a construction-based health risk assessment (HRA) following the latest OEHHA guidance has been performed. The HRA is included as Appendix F to this EIR.

An HRA requires the completion and interaction of four general steps:

1. Quantify project-generated TAC emissions.

<sup>&</sup>lt;sup>2</sup> The intersection would need to operate at Level of Service (LOS) F for several hours per day.

- Identify nearby ground-level receptor locations that may be affected by the emissions (including any special sensitive receptor locations such as residences, schools, hospitals, convalescent homes, and daycare centers).
- 3. Perform air dispersion modeling analyses to estimate ambient pollutant concentrations at each receptor location using project TAC emissions and representative meteorological data to define the transport and dispersion of those emissions in the atmosphere.
- 4. Characterize and compare the calculated health risks with the applicable health risk significance thresholds.

#### Construction Health Risk Assessment Assumptions

The U.S. EPA AMS/EPA Regulatory Model (AERMOD) model, the air dispersion modeling method approved by the ARB for such assessments was used to estimate concentrations of DPM from the construction of the project. The DPM construction emissions were estimated from the annual CalEEMod emissions for the project, and amount to weighted averages of 0.272615 tons per year of DPM (as PM<sub>10</sub> exhaust) for 2021, 0.114189 tons for years 2022-2023, and 0.09603 tons per year of DPM for years 2024-2026 (see Table 5.2-6). The emissions were represented in the model as an area source equal to the size of the project's construction area (approximately 180 acres). An emission release height of 3.66 meters was also assumed, to account for the average emissions height from all pieces of construction equipment. Receptor locations where construction impacts were calculated focused on the residential receptors located adjacent to the project site. Meteorological data used in the model is from the closest monitoring station, the El Rio monitoring station, approximately 8.8 miles northwest of the project site.

TABLE 5.2-6 - CONSTRUCTION-BASED EMISSION FACTORS								
Year	Tons per Year of DPM	Duration						
2021	0.272615385	1 year exposure						
2022-2023	0.114189423	2 year exposure						
2024-2026	0.09603	3 year exposure						

#### Receptor Network

The assessment requires that a network of receptors be specified where the impacts can be computed at the various locations surrounding the project site. Discrete receptors were mainly located at residential locations close to the project site boundary with a receptor located at the Camarillo Springs mobile home park community pool. Discrete receptors are identified as orange triangles and numbered 1 through 14 in Figure 5.2-1. In addition, the identified sensitive receptors locations were supplemented by the

specification of a modeling grid that extended around the proposed project site to identify other potential locations of impact.

## Estimation of Health Risks

Potential health risks from DPM are twofold. First, diesel particulate matter is a carcinogen according to the State of California. Second, long-term chronic exposure to diesel particulate matter can cause health effects to the respiratory system. Each of these health risks is discussed below. Because the VCAPCD does not have its own formula for health risk calculations, to be conservative, South Coast Air Quality Management District (SCAQMD) formulae (based on the most-recent Office of Environmental Health Hazard Assessment guidance) were used as detailed below.

#### **Cancer Risks**

According to the Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, released by the Office of Environmental Health Hazard Assessment (OEHHA) in February 2015 and formally adopted in March 2015, the residential inhalation dose for long-term cancer risk assessment should be calculated using the following formula:

[Dose-air (mg/(Kg-day))\*Cancer Potency\*[1x10-6] = Potential Cancer Risk

#### Where:

Cancer Potency Factor = 1.1

Dose-inh =  $(C\neg air * DBR * A * EF * ED *ASF*FAH* 10-6) / AT$ 

#### Where:

- DBR [Daily breathing rate (L/kg body weight day)] = 261 for adults, 572 for children, and 1,090 for infants, and 361 for 3rd trimester per SCAQMD Permit Application Package "M" Table 9.1 guidance.
- A [Inhalation absorption factor] = 1
- EF [Exposure frequency (days/year)] = 350
- ED [Exposure duration (years)] = 30 for adults (for an individual who is an adult at opening year), 14 for children (from 2-16 years), 14 for adults (from 16-30 years), 2 for infants, and 1 for 3rd Trimester ASF [Age sensitivity factor) = 10 for 3rd trimester to 2 years of age, 3 for 2 to 16 years of age, and 1 for 16 to 30 years of age
- FAH [Fraction of time spent at home] = 1 for 3rd trimester to 2 years of age, 1 for 2 to 16 years of age, and 0.73 for 16 to 30 years of age
- 10<sup>6</sup> [Micrograms to milligrams conversion]
- AT [Average time period over which exposure is averaged in days] = 25,550

FIGURE 5.2-1 - AERMOD MODEL SOURCE AND RECEPTOR PLACEMENT



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As the project is expected to be constructed from 2021 to 2026 (less than five years total), only the impacts to the most sensitive groups, 3rd trimester, infants (0-2 years) and children were evaluated and the exposure frequency and duration were adjusted to correspond to the number of construction days/construction time as necessary (see Tables 5.2-7 through 5.2-9 for calculation details). The model run result for the most impacted group is shown below in Figure 5.2-2 (for infants 0-2 years). The tables provide a summary of the unmitigated calculated construction diesel emission concentrations at the nearest fetus (3rd trimester), infant (0-2 years), and child (2+ years) receptors respectively.

Table 5.2-7 shows that 3rd trimester exposure would not result in a cancer risk in excess of 10 in a million. This impact would be less than significant.

TABLE 5.2-7 - CARCINOGENIC RISKS AND NON-CARCINOGENIC HAZARDS 3RD TRIMESTER EXPOSURE SCENARIO (0.25 YEARS) 2021

Dagantar	Maximum	Carcinog	enic Risk	Non-carcino	genic Hazard
Receptor ID	Concentration (µg/m³)	Risk (per million)	Significant Impact <sup>1</sup>	Hazard Index	Significant Impact <sup>2</sup>
1	0.23793	2.40	No	0.0476	No
2	0.2413	2.44	No	0.0483	No
3	0.04578	0.46	No	0.0092	No
4	0.32275	3.26	No	0.0646	No
5	0.06247	0.63	No	0.0125	No
Pool 6	0.21106	2.13	No	0.0422	No
7	0.31159	3.15	No	0.0623	No
8	0.22745	2.30	No	0.0455	No
9	0.04213	0.43	No	0.0084	No
10	0.26034	2.63	No	0.0521	No
11	0.06248	0.63	No	0.0125	No
12	0.01618	0.16	No	0.0032	No
13	0.00864	0.09	No	0.0017	No
14	0.030059	0.31	No	0.0061	No

<sup>&</sup>lt;sup>1</sup> A significant impact occurs if the carcinogenic risk is greater than 10 in 1 million.

Source of table data: MD Acoustics, June 29, 2020.

However, Table 5.2-8 shows that infant receptors (0-2 years) closest to the project boundary, next to the footprint where construction (including grading, infrastructure, building construction, paving and

<sup>&</sup>lt;sup>2</sup> A significant impact occurs if the Hazard Index is 1.0 or greater.

architectural coating) would occur, would experience the highest levels of construction-related diesel emissions, resulting in a maximum cancer risk of 23.26 in a million. As emissions of diesel particulate matter from construction equipment would cause an exceedance of the 10 in a million TAC threshold, this impact is potentially significant.

TABLE 5.2-8 - CARCINOGENIC RISKS AND NON-CARCINOGENIC HAZARDS INFANT EXPOSURE SCENARIO (2 YEAR) 2022-2023 WITH TIER 3 ENGINES

Dogombor	Maximum	Carcinog	enic Risk	Non-carcinogenic Hazard		
Receptor ID	Concentration (µg/m³)	Risk (per million)	Significant Impact <sup>1</sup>	Hazard Index	Significant Impact <sup>2</sup>	
1	0.0996	17.13	Yes	0.0199	No	
2	0.10107	17.39	Yes	0.0202	No	
3	0.01918	3.30	No	0.0038	No	
4	0.13519	23.26	Yes	0.0270	No	
5	0.0216	3.72	No	0.0043	No	
Pool 6	0.0884	15.21	Yes	0.0177	No	
7	0.13051	22.45	Yes	0.0261	No	
8	0.09527	16.39	Yes	0.0191	No	
9	0.01764	3.03	No	0.0035	No	
10	0.10905	18.76	Yes	0.0218	No	
11	0.02617	4.50	No	0.0052	No	
12	0.00677	1.16	No	0.0014	No	
13	0.00362	0.62	No	0.0007	No	
14	0.01281	2.20	No	0.0026	No	

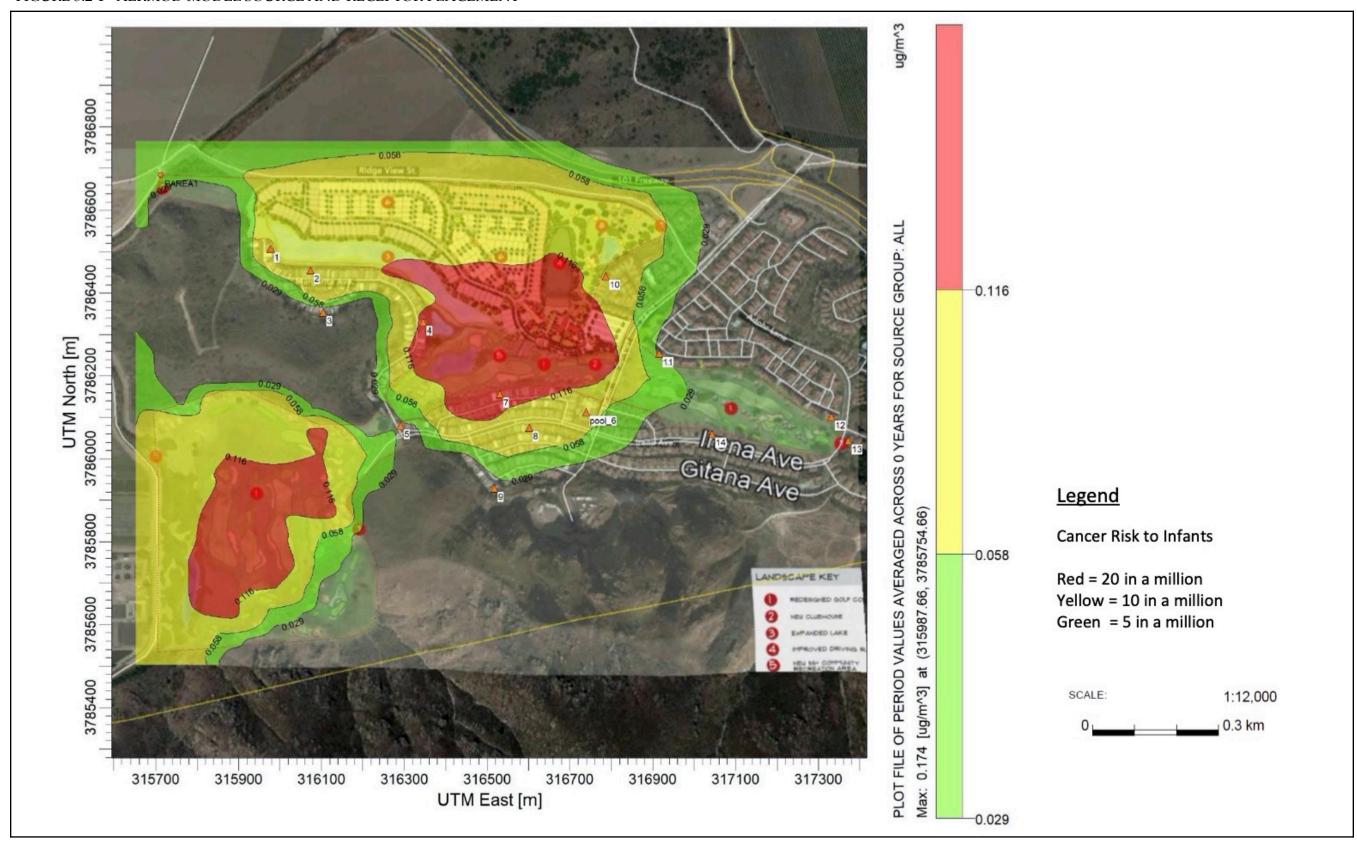
<sup>&</sup>lt;sup>1</sup> A significant impact occurs if the carcinogenic risk is greater than 10 in 1 million.

Source of table data: MD Acoustics, June 29, 2020.

Mitigation measure AQ-1 already requires that heavy diesel equipment used for grading and utilities installation to have Tier 3 or better engines with diesel oxidation catalysts, level 3 diesel particulate filters that reduce particulate matter by at least 85 percent and meet the latest CARB best available control technology. Table 5.2-9 shows that with incorporation of mitigation measure AQ-1, the cancer risk to infants will have decreased at all receptor locations to less than 10 in a million. Therefore, mitigation measure AQ-1 would reduce the construction-related health risk impact of the project to a less than significant level.

<sup>&</sup>lt;sup>2</sup> A significant impact occurs if the Hazard Index is 1.0 or greater.

FIGURE 5.2-1 - AERMOD MODEL SOURCE AND RECEPTOR PLACEMENT



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TABLE 5.2-9 - MITIGATED CARCINOGENIC RISKS AND NON-CARCINOGENIC HAZARDS INFANT EXPOSURE SCENARIO (2 YEAR) 2022-2023

Maximum		Carcinog	enic Risk	Non-carcinogenic Hazaro		
Receptor ID	Concentration (µg/m³)	Risk (per million)	Significant Impact <sup>1</sup>	Hazard Index	Significant Impact <sup>2</sup>	
1	0.01494	2.57	No	0.0030	No	
2	0.01516	2.61	No	0.0030	No	
3	0.00288	0.49	No	0.0006	No	
4	0.02028	3.49	No	0.0041	No	
5	0.00324	0.56	No	0.0006	No	
Pool 6	0.01326	2.28	No	0.0027	No	
7	0.01958	3.37	No	0.0039	No	
8	0.01429	2.46	No	0.0029	No	
9	0.00265	0.46	No	0.0005	No	
10	0.01636	2.81	No	0.0033	No	
11	0.00393	0.68	No	0.0008	No	
12	0.00102	0.17	No	0.0002	No	
13	0.00054	0.09	No	0.0001	No	
14	0.00192	0.33	No	0.0004	No	

<sup>&</sup>lt;sup>1</sup> A significant impact occurs if the carcinogenic risk is greater than 10 in 1 million.

Source of table data: MD Acoustics, June 29, 2020.

Table 5.2-10 shows that the exposure to children 2+ years for the remaining duration of construction would not result in a cancer risk in excess of 10 in a million. As children 2+ years would not be exposed to construction-related cancer risk from DPM emissions in excess of 10 in a million, it is reasonable to assume that neither adults nor off-site workers would be exposed to construction-related cancer risk from DPM emissions in excess of 10 in a million. This impact would be less than significant.

#### **Non-Cancer Risks**

The relationship for non-cancer health effects is given by the equation:

HIDPM = CDPM/RELDPM

Where.

HIDPM = Hazard Index; an expression of the potential for non-cancer health effects.

CDPM = Annual average diesel particulate matter concentration in  $\mu g/m^3$ .

<sup>&</sup>lt;sup>2</sup> A significant impact occurs if the Hazard Index is 1.0 or greater.

TABLE 5.2-10 - CARCINOGENIC RISKS AND NON-CARCINOGENIC HAZARDS
CHILD EXPOSURE SCENARIO 2024-2026

D	Maximum	Carcinog	enic Risk	Non-carcinos	genic Hazard
Receptor ID	Concentration (µg/m³)	Risk (per million)	Significant Impact <sup>1</sup>	Hazard Index	Significant Impact <sup>2</sup>
1	0.08381	3.22	No	0.0168	No
2	0.085	3.27	No	0.0170	No
3	0.01613	0.62	No	0.0032	No
4	0.11369	4.37	No	0.0227	No
5	0.022	0.85	No	0.0044	No
Pool 6	0.07435	2.86	No	0.0149	No
7	0.10976	4.22	No	0.0220	No
8	0.08012	3.08	No	0.0160	No
9	0.01484	0.57	No	0.0030	No
10	0.09171	3.52	No	0.0183	No
11	0.02201	0.85	No	0.0044	No
12	0.0057	0.22	No	0.0011	No
13	0.00304	0.12	No	0.0006	No
14	0.01078	0.41	No	0.0022	No

<sup>&</sup>lt;sup>1</sup> A significant impact occurs if the carcinogenic risk is greater than 10 in 1 million.

Source of table data: MD Acoustics, June 29, 2020.

RELDPM = Reference Exposure Level (REL) for diesel particulate matter; the diesel particulate matter concentration at which no adverse health effects are anticipated.

The non-carcinogenic hazards to residential 3rd trimester, infant, and child receptors are also detailed in Tables 5.2-7 through 5.2-9. The RELDPM is 5  $\mu g/m^3$ . The Office of Environmental Health Hazard Assessment as protective for the respiratory system has established this concentration. Using the maximum DPM concentration for infant exposure, the resulting Hazard Index is:

HIDPM = 0.41479/5 = 0.08296

The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the proposed project would have a less than significant impact due to the non-cancer risk from diesel emissions from the construction equipment.

<sup>&</sup>lt;sup>2</sup> A significant impact occurs if the Hazard Index is 1.0 or greater.

## Mitigation

The following mitigation measure is identified to comply with VCAPCD Rule 55 and reduce the fugitive dust generated during project construction:

- AQ-2 All project contractors must implement fugitive dust control measures throughout all phases of construction. The project developer shall include in construction contracts the following control measures:
  - Minimize the area disturbed on a daily basis by clearing, grading, earthmoving, and/or excavation operations.
  - Pre-grading/excavation activities must include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities.
  - All trucks must be required to cover their loads as required by California Vehicle Code §23114.
  - All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, must be treated to prevent fugitive dust. Treatment must include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering must be done as often as necessary.
  - Material stockpiles must be enclosed, covered, stabilized, or otherwise treated, to prevent blowing fugitive dust offsite.
  - Graded and/or excavated inactive areas of the construction site must be monitored by a City-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, must be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
  - Signs must be posted on-site limiting on-site traffic to 15 miles per hour or less.
  - During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations must be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/ supervisor must use his/her discretion in conjunction with the VCAPCD is determining when winds are excessive.

- Adjacent streets and roads must be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

## Mitigation Monitoring

The Department of Community Development shall review project construction contracts prior to issuance of grading permits to ensure that the contracts include the requirements of mitigation measure AQ-2.

## **Impact After Mitigation**

As discussed previously, if all appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant. Therefore, mitigation measure AQ-2 would reduce the construction-related fugitive dust impact of the project to a less than significant level by reducing fugitive dust and particulate matter emissions to the extent feasible through watering, truck covers, the use of stabilization materials, enclosing stockpiles, air monitoring, and stopping work during wind events.

# **Objectionable Odors**

**Threshold**: Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

**Impact**: Implementation of the proposed project would not result in other emissions that create objectionable odors adversely affecting a substantial number of people.

#### Impact Analysis

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The proposed project consists of the development of new residential buildings. Residential uses and golf courses are not typically associated with odor complaints. As the proposed uses involve no elements related to industrial projects, no objectionable odors are anticipated to be generated by the proposed project.

During construction a small amount of odors associated with the use of diesel-powered construction equipment may be present. However, odors associated with construction machinery dissipate and disperse quickly, and construction activities would not be located close to existing residences for any prolonged period of time.

Both operational and construction odor impacts will be less than significant.

#### **CUMULATIVE IMPACTS**

The VCAPCD recommends that any operational emissions from individual projects that exceed the project-specific thresholds of significance identified above be considered cumulatively considerable. As discussed in the preceding impact analysis, the proposed project would generate average daily operational emissions that do not exceed the thresholds of significance recommended by the VCAPCD. As such, the project would not generate a cumulatively considerable net increase of criteria pollutants. This would be a less than significant cumulative impact.

As discussed previously, construction-related ROC and NOx emissions are not counted towards the ROC and NOx significance thresholds, since these emissions are only temporary. Likewise, the VCAPCD has not adopted any thresholds of significance for fugitive dust. However, the project would implement construction equipment and fugitive controls recommended by the VCAPCD. As such, the contribution of the project to any regional cumulative construction-related air quality impacts would not be cumulatively considerable.

Construction-related TAC impacts are generally confined to the immediate vicinity of a project site. At the present time, the only other related projects within the Camarillo Springs area are the request to modify the conditional of approval for the Village Greens Market located at 795 Camarillo Springs Road and the work plan to backfill Pond 7 at Camarillo Springs Golf Course. No other new development is proposed or approved within the Camarillo Springs area. The work plan to backfill Pond 7 would involve a small number of construction equipment to excavate the trench for the new storm drain pipe, install the new storm drain pipe, fill the trench, remove the material above the Pond 7 liner, and fill the pond with uncompacted soil. These activities are anticipated to occur before any construction occurs for the Camarillo Springs GPA 2017-2 project. As such, no other related projects would generate localized construction-related TAC emissions and impact the sensitive receptors in the vicinity of the project site.

Likewise, the other related project in the Camarillo Springs area would not be a source anticipated to be a source of objectionable odors.

#### UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant air quality impacts.

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# **ENERGY**

## **SUMMARY**

The proposed project would not consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.

The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

#### **ENVIRONMENTAL SETTING**

# **Regional Energy Supply**

Electricity is provided to customers in Camarillo by Southern California Edison (SCE). SCE provides electric power to more than 14 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. SCE derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

Table 5.5-1 shows the electricity consumption in the SCE service area in 2018, which is the latest data available from the California Energy Commission (CEC). As shown, customers within the SCE service area consumed approximately 85.3 billion kilowatt-hours (kWh) of electricity in 2018. Commercial building and residential uses are the two primary consumption sectors.

TABLE 5.5-1 - ELECTRICITY CONSUMPTION IN THE SCE SERVICE AREA IN 2018

	Electricity Consumption in Million Kilowatt-hours									
Agriculture & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage			
3,192.21	31,573.78	4,367.39	13,391.63	2,390	29,865	496	85,276			
3.74%	37.03%	5.12%	15.70%	2.80%	35.02%	0.58%				

Source of table data: California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool.

Natural gas is provided to customers in Camarillo by the Southern California Gas Company (SCG). Most of the natural gas used in California comes from out-of-state natural gas basins. In 2012, California

customers received 35% of their natural gas supply from basins located in the Southwest, 16% from Canada, 40% from the Rocky Mountains, and 9% from basins located within California. SCG owns and operates several natural gas storage fields that are located in northern and southern California. These storage fields, and four independently owned storage utilities – Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage – help meet peak seasonal natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently.

Table 5.5-2 shows the natural gas consumption in the SCG service area in 2018, which is the latest data available from the CEC. As shown, customers within the SCG service area consumed approximately 5.2 billion therms<sup>1</sup> of natural gas in 2018. Industry and residential uses are the two primary consumption sectors.

TABLE 5.5-2 - NATURAL GAS CONSUMPTION IN THE SCG SERVICE AREA IN 2018

Natural Gas Consumption in Million Therms									
Agriculture & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Total Usage			
77.61	912.98	74.52	1,714.36	229.22	2,147.39	5,156.08			
1.51%	17.71%	1.45%	33.25%	4.45%	41.65%				

Source of table data: California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool.

California's on-road transportation system includes over 170,000 miles of highways and major roadways, more than 27 million passenger vehicles and light trucks, and almost eight million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008, it is still by far the dominant fuel. Petroleum comprises about 92 percent of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 19 billion gallons of on-highway fuel are consumed each year, including 15.1 billion gallons of gasoline (including ethanol) and 3.9 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2016, Californians also used 194 million therms of natural gas as a transportation fuel, or the equivalent of 155 million gallons of gasoline.

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy. The EIA conducts a comprehensive data collection program that covers the full spectrum of energy sources, end uses, and energy flows, and publishes that data for each state. The most recent "Quick Facts" published by the EIA for California state that:<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> A therm is a unit of heat energy equal to 1000,000 British thermal units (Btu). It is approximately the entry equivalent of burins 100 cubic feet of natural gas.

<sup>&</sup>lt;sup>2</sup> U.S. Energy Information Administration. https://www.eia.gov/state/index.php?sid=CA, January 16, 2020.

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation's jet fuel consumption in 2018.
- California's total energy consumption is second-highest in the nation, but, in 2018, the state's per capita
  energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency
  programs.
- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
- In 2018, large- and small-scale solar PV and solar thermal installations provided 19% of California's net electricity generation.

As indicated above, California is one of the nation's leading energy-producing states, and California per capita energy use is among the nation's most efficient.

# **Regulatory Setting**

## California Regulations

#### Title 24

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption. The current 2022 Title 24 standards (effective as of January 1, 2023) were adopted to respond, amongst other reasons, to the requirements of the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32). Specifically, new development projects constructed within California after January 1, 2023 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The indoor and outdoor water use standards of the CALGreen Code are already addressed by the Camrosa Water District's Water Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new residential and non-residential developments proposed for the project site are as follows:

#### Residential Uses

Division 4.1 - Planning and Design

- Section 4.106 Site Development
  - 4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, 4.106.4.2, or 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625.
  - 4.106.4.1 New one- and two-family dwellings and townhouses with attached garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or sub panel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or sub panel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a brach circuit overcurrent protective device.
- Division 4.4 Material Conservation and Resource Efficiency
  - Section 4.408 Construction Waste Reduction, Disposal and Recycling
    - 4.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.
    - 4.408.2 Construction waste management plan. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.
      - 1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
      - 2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
      - 3. Identify diversion facilities where the construction and demolition waste material will be taken.
      - 4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.

- 5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, or both.
- 4.408.3 Waste management company. Utilize a waste management company, approved by the
  enforcing agency, which can provide verifiable documentation that the percentage of
  construction and demolition waste material diverted from the landfill complies with Section
  4.408.1.
- 4.408.4 Waste stream reduction alternative. Projects that generate a total combined weight of
  construction and demolition waste disposed of in landfills which do not exceed 3.4 pounds per
  square foot of the building area, shall meet the minimum 65 percent construction waste
  reduction requirement in Section 4.408.1.
  - 4.408.4.1 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
- Section 4.410 Building Maintenance and Operation
  - 4.410.1 Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - 1. Directions to the owner or occupant that the manual shall remain with the building throughout the lifecycle of the structure.
    - 2. Operation and maintenance instructions for the following:
      - a. Equipment and appliances, including water saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
      - c. Space conditioning systems, including condensers and air filters.
    - 3. Information from local utility, water and waste recovery providers on methods to reduce resource consumption, including recycle programs and locations.
    - 4. Public transportation and/or carpool options available in the area.
    - 9. Information about state solar energy and incentive programs available.
    - 10. A copy of all special inspection verifications required by the enforcing agency or this code.

Nonresidential Uses

- Division 5.1 Planning and Design
  - Section 5.106 Site Development
    - 5.106.12 Shade Trees. Shade trees shall be planted to comply with Sections 5.106.12.1, 5.106.12.2, and 5.106.12.3. Percentages shown shall be measured at noon on the summer solstice. Landscape irrigation necessary to establish and maintain tree health shall comply with Section 5.304.6.
      - 5.106.12.1 Surface parking areas. Shade tree plantings, minimum #10 container size or equal shall be installed to provide shade over 50 percent of the parking area within 15 years.
- Division 5.4 Material Conservation and Resource Efficiency
  - Section 5.408 Construction Waste Reduction, Disposal and Recycling
    - 5.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
      - 5.408.1.1 Construction waste management plan. Where a local jurisdiction does not have a construction and demolition waste management ordinance that is more stringent, submit a construction waste management plan that:
        - Identifies the construction and demolition waste materials to be diverted from disposal by efficient useage, recycling, reuse on the project or salvage for future use or sale.
        - 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
        - 3. Identifies diversion facilities where the construction and demolition waste material will be taken.
        - 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.
      - 5.408.1.2 Waste management company. Utilize a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with this section.

- 5.408.1.3 Waste stream reduction alternative. The combined weight of new construction disposal that does not exceed two pounds per square foot of the building area, shall meet the minimum 65 percent minimum requirement as approved by the enforcing agency.
- 5.408.3 Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Section 5.410 Building Maintenance and Operation
  - 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.

The California Energy Commission (CEC) anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades.

#### AB 1493 Pavley Regulations and Fuel Efficiency Standards

California AB 1493, enacted on July 22, 2002, required the California Air Resources Board (ARB) to develop and adopt regulations that reduce greenhouse gases (GHGs) emitted by passenger vehicles and light duty trucks. Under this legislation, the ARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although specifically aimed at reducing GHG emissions, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

#### California Renewable Portfolio Standards (SB 1078)

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020. In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly-owned utilities.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant energy impact if it would:

- Consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

In addition, Appendix F to the State CEQA Guidelines states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption.
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

Pursuant to impact possibilities listed in Appendix F to the State CEQA Guidelines, environmental impacts associated with regard to energy consumption and conservation may include:

- 1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- 4. The degree to which the project complies with existing energy standards;
- 5. The effects of the project on energy resources;
- 6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

## PROJECT IMPACTS AND MITIGATION MEASURES

## **Energy Consumption**

**Threshold**: Would the proposed project consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation?

**Impact**: The proposed project would not consume energy resources in a wasteful, inefficient, or unnecessary amount during project construction and/or operation.

## Impact Analysis

Implementation of the proposed project would result in the consumption for energy resources during both construction and long-term operation. In both cases, all energy demand would be subject to all statewide regulations for the purchase and use of fuels, equipment, vehicles, and appliances.

The evaluation in this section utilizes the assumptions and results presented in the California Emissions Estimator Model (CalEEMod v. 2022.1) results sheets for the Air Quality and Greenhouse Gas Emissions sections of this EIR and provided in Appendix E to this EIR. Additional calculations were conducted for this analysis since CalEEMod does not display the amount and fuel type for construction-related sources. These calculations are provided in Appendix K to this EIR.

As stated previously, Appendix F to the State CEQA Guidelines provides for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. The analysis below addresses each of these potential energy impacts identified in State CEQA Guidelines Appendix F.

The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal

#### Construction Energy Demands

Project construction would require the use of construction equipment for grading, hauling, and building activities, as well as construction workers and vendors traveling to and from the project site. Construction equipment requires diesel as the fuel source.

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod output files. The total horsepower was then multiplied by rate of 0.05 gallon of diesel usage per horsepower-hour based on Table A9-3-E of the South Coast Air Quality Management District's CEQA Air Quality Handbook. Fuel consumption from construction worker and vendor/delivery trucks was calculated using the trip rates and distances provided in the CalEEMod output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor

using the ARB's EMFAC 2022 model. EMFAC 2022 provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include light duty automobiles and light duty trucks. Construction vendor trucks were assumed to be medium-duty and heavy-duty trucks. The construction fuel consumption calculations are provided in Appendix K of this EIR and are summarized in Table 5.5-3.

TABLE 5.5-3 - ESTIMATED CONSTRUCTION FUEL CONSUMPTION

Construction Fuel Demand Source	Total Fuel Consumption (gallons)
Construction Equipment	428,016
Construction Worker Trips	174,298
Construction Vendor Trips	18,701
Total Construction Fuel Demand	621,015
	<del>'</del>

Construction phase fuel consumption calculation sheets are provided in Appendix K.

As shown in Table 5.5-1, a total of approximately 621,015 gallons of fuel would be consumed throughout the construction of the proposed project. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Construction equipment is also required to comply with regulations limiting idling to five minutes or less (CCR Title 13 §2449(d)(3)). Compliance with anti-idling regulations results in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of fuel.

Indirectly, construction energy efficiencies and energy conservation would also be achieved for the proposed development through energy efficiencies realized from bulk purchase, transport, and use of construction materials.

#### **Operational Energy Demands**

For operational activities, annual electricity and natural gas consumption were calculated and presented on page 94 of the CalEEMod output. CalEEMod estimates the project's electricity demand to be

approximately 971,756 kWh (approximately one million kWh) per year and the natural gas consumptions to be approximately 4,506,605 kilo-British thermal units (kBTUs) or approximately 45,066 therms.<sup>3</sup>

The fuel consumption from the traffic generated by the project was calculated using the annual VMT total provided in the CalEEMod output file divided by the average fuel economy for all vehicle classes using EMFAC 2022. The operational fuel consumption calculations provided estimate that project vehicle trips would consume approximately 261,112 gallons of fuel per year.

The project would promote building energy efficiency through compliance with all applicable energy efficiency standards of Title 24 and the CALGreen Code that are in affect at the time of project development. The project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT (see the Transportation section of this EIR). AB 1493 ("the Pavley Standard") requires reductions in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

While the project would result in the consumption of energy resources, the use of these resources would not occur in a wasteful, inefficient, or unnecessary amount. The City of Camarillo, as lead agency, considers the energy impacts associated with projects that comply with the applicable provisions of Title 24 Part 6 and the CalGreen Code for building construction to be less than significant.<sup>4</sup>

## The effects of the project on local and regional energy supplies and on requirements for additional capacity

As discussed previously, customers within the SCE service area consumed approximately 85.3 billion kilowatt-hours (kWh) of electricity in 2018 while customers within the SCG service area consumed approximately 5.2 billion therms of natural gas in 2018. The annual electricity demand of the proposed project (approximately 971,756 kWh) represents a 0.00114% increase in the demand for electricity. The annual natural gas demand of the proposed project (approximately 45,066 therms) represents a 0.000874% increase in the demand for natural gas. These resources as well as fuel for vehicles is currently not limited in quantities for consumer consumption and additional capacity would not be required to accommodate the demands of the project.

<sup>&</sup>lt;sup>3</sup> These are the mitigated amounts that represent compliance with the energy efficiency requirements of Title 24 and the CalGreen Code.

<sup>&</sup>lt;sup>4</sup> City of Camarillo, City of Camarillo Environmental Guidelines, May 2020.

#### The effects of the project on peak and base period demands for electricity and other forms of energy

As described above, the electricity demand of the project represents a 0.00114% increase in the demand for SCE electricity consumption. This is a negligible increase that would not have an adverse affect on energy supplies.

With regard to peak hour demands, purveyors of energy resources, including SCE, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. The proposed project supports these efforts through compliance with Title 24 and the CALGreen Code that will not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the proposed project will not substantially affect peak and base period demands for electricity or other forms of energy.

#### The degree to which the project complies with existing energy standards

As discussed previously, the project would promote building energy efficiency through compliance with all applicable energy efficiency standards of Title 24 and the CALGreen Code that are in affect at the time of project development. The project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT. AB 1493 ("the Pavley Standard") requires reductions in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

#### The effects of the project on energy resources

The effects of the project on energy supplies and resources from a capacity standpoint are described above in the preceding analyses. While the project would result in the consumption of energy resources, the use of these resources would not occur in a wasteful, inefficient, or unnecessary amount. The City of Camarillo, as lead agency, considers the energy impacts associated with projects that comply with the applicable provisions of Title 24 Part 6 and the CalGreen Code for building construction to be less than significant.

## The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

As stated above, energy impacts associated with transportation during construction and operation of the project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Further, the project also reduces potential vehicle fuel usage due to compliance with regulatory programs and its location that reduce VMT (see the Transportation section of this EIR).

## **Energy Efficiency**

**Threshold**: Would the proposed project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

**Impact**: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

## Impact Analysis

There are currently no adopted State or local plans for renewable energy that are applicable to the proposed project. As discussed above, the construction and operational activities would be subject to the applicable energy efficiency requirements of Title 24 Part 6 and the CalGreen Code that are in effect at the time of development. As such, the project would not conflict with such plans, and no impact would occur.

#### **CUMULATIVE IMPACTS**

Project construction and operation would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the project can be accommodated within the context of available resources and energy delivery systems. The project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Other cumulative developments within the City and the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, other cumulative developments would be subject to the same regulatory requirements as the proposed project, including compliance with Title 24 and the CalGreen Code, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, the proposed project would not result in a potentially cumulatively-considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Thus, impacts would not be cumulatively considerable.

#### UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant energy impacts.

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## GREENHOUSE GAS EMISSIONS

#### **SUMMARY**

The proposed project would generate greenhouse gas emissions but would not exceed the thresholds of significance recommended by the Ventura County Air Pollution Control District.

The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

#### **ENVIRONMENTAL SETTING**

## **Greenhouse Gas Emissions Background**

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide ( $CO_2$ ), methane ( $CH_4$ ), nitrous oxide ( $N_2O$ ), sulfur hexafluoride ( $SF_6$ ), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor ( $H_2O$ ).  $CO_2$  is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as  $CO_2$  equivalents ( $CO_2e$ ).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05 on June 1, 2005, which calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions below 1990 levels by

2050 in California. The Secretary of the California Environmental Protection Agency (CalEPA) was charged with coordination of efforts to meet these targets and formed the Climate Action Team (CAT) to implement the Order.

In March 2006, the CAT published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (the 2006 CAT Report). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-andtrade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposed full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Scoping Plan was approved by the ARB on December 11, 2008. According to the current 2022 Scoping Plan For Achieving Carbon Neutrality (2022 Scoping Plan), California has achieved its AB 32 target years ahead of schedule, all the while growing its economy, with the state distinguishing itself as a hub for green technology investment.<sup>1</sup>

In April 2015, Governor Brown signed Executive Order B-30-15 which establishes a new interim target to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. This interim target is established to ensure that the state meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include: increasing renewable electricity to 50 percent; 2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; 3) reducing petroleum use in cars and trucks by up to 50 percent; 4)

<sup>&</sup>lt;sup>1</sup> California Air Resources Board, 2022.

reducing emissions of short-lived climate pollutants; and 5) managing farms, rangelands, forests and wetlands to increasingly store carbon. Executive Order B-30-15 also called on the ARB to update the AB 32 Climate Change Scoping Plan to incorporate the 2030 target. The new interim standard was adopted under Senate Bill 32 (SB) 32 and the ARB requirements were adopted under AB 197 in the Summer of 2016.

## **Regulatory Setting**

#### California Emissions Reductions Policies and Targets

In June 2005, Governor Schwarzenegger issued Executive Order S-3-05, establishing GHG emissions reduction targets for the State of California. In 2006, the State adopted the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). AB 32 declared that global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California, and established a State goal of reducing GHG emissions to 1990 levels by the year 2020.

Executive Order B-30-15 was enacted by Governor Brown on April 29, 2015. This Executive Order establishes an interim GHG emission reduction goal for the State to reduce GHG emissions to 40 percent below 1990 levels by 2030. This Executive Order also directs all State agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the year 2050.

SB 32 authorizes the California Air Resources Board (CARB) to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. The California Legislature also passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

#### California Regulations

Although not originally intended to specifically reduce GHG emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The

current 2022 Title 24 standards (effective as of January 1, 2023) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2023 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The indoor and outdoor water use standards of the CALGreen Code are already addressed by the Camrosa Water District's Water Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new residential and non-residential developments proposed for the project site are as follows:

#### Residential Uses

- Division 4.1 Planning and Design
  - Section 4.106 Site Development
    - 4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, 4.106.4.2, or 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625.
    - 4.106.4.1 New one- and two-family dwellings and townhouses with attached garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or sub panel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or sub panel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a brach circuit overcurrent protective device.
- Division 4.4 Material Conservation and Resource Efficiency
  - Section 4.408 Construction Waste Reduction, Disposal and Recycling
    - 4.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.
    - 4.408.2 Construction waste management plan. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be

updated as necessary and shall be available during construction for examination by the enforcing agency.

- 1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
- 2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
- 3. Identify diversion facilities where the construction and demolition waste material will be taken.
- 4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.
- 5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, or both.
- 4.408.3 Waste management company. Utilize a waste management company, approved by the
  enforcing agency, which can provide verifiable documentation that the percentage of
  construction and demolition waste material diverted from the landfill complies with Section
  4.408.1.
- 4.408.4 Waste stream reduction alternative. Projects that generate a total combined weight of
  construction and demolition waste disposed of in landfills which do not exceed 3.4 pounds per
  square foot of the building area, shall meet the minimum 65 percent construction waste
  reduction requirement in Section 4.408.1.
  - 4.408.4.1 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
- Section 4.410 Building Maintenance and Operation
  - 4.410.1 Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - 1. Directions to the owner or occupant that the manual shall remain with the building throughout the lifecycle of the structure.
    - 2. Operation and maintenance instructions for the following:

- a. Equipment and appliances, including water saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
- c. Space conditioning systems, including condensers and air filters.
- 3. Information from local utility, water and waste recovery providers on methods to reduce resource consumption, including recycle programs and locations.
- 4. Public transportation and/or carpool options available in the area.
- 9. Information about state solar energy and incentive programs available.
- 10. A copy of all special inspection verifications required by the enforcing agency or this code.

#### Nonresidential Uses

- Division 5.1 Planning and Design
  - Section 5.106 Site Development
    - 5.106.12 Shade Trees. Shade trees shall be planted to comply with Sections 5.106.12.1, 5.106.12.2, and 5.106.12.3. Percentages shown shall be measured at noon on the summer solstice. Landscape irrigation necessary to establish and maintain tree health shall comply with Section 5.304.6.
      - 5.106.12.1 Surface parking areas. Shade tree plantings, minimum #10 container size or equal shall be installed to provide shade over 50 percent of the parking area within 15 years.
- Division 5.4 Material Conservation and Resource Efficiency
  - Section 5.408 Construction Waste Reduction, Disposal and Recycling
    - 5.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
      - 5.408.1.1 Construction waste management plan. Where a local jurisdiction does not have a construction and demolition waste management ordinance that is more stringent, submit a construction waste management plan that:
        - Identifies the construction and demolition waste materials to be diverted from disposal by efficient useage, recycling, reuse on the project or salvage for future use or sale.

- 2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
- 3. Identifies diversion facilities where the construction and demolition waste material will be taken.
- 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.
- 5.408.1.2 Waste management company. Utilize a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with this section.
- 5.408.1.3 Waste stream reduction alternative. The combined weight of new construction disposal that does not exceed two pounds per square foot of the building area shall meet the minimum 65 percent minimum requirement as approved by the enforcing agency.
- 5.408.3 Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Section 5.410 Building Maintenance and Operation
  - 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.

#### **Statewide GHG Emissions**

According to the 2022 Scoping Plan, the major source of GHGs in California is transportation, contributing approximately 40 percent of the state's total GHG emissions.<sup>2</sup> Industrial sources are the second largest generator, contributing approximately 15 percent of the state's GHG emissions. Residential and commercial sources contribute approximately 10 percent of the State's GHG emissions. Agriculture contributes approximately eight percent of the state's GHG emissions.

## **Existing Project Site Emissions**

Camarillo Springs Golf Course is a 182-acre, privately-owned facility that has been developed and operational for more than 45 years. The property is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures.

<sup>&</sup>lt;sup>2</sup> California Air Resources Board, 2022.

The annual GHG emissions associated with the existing golf course have been estimated utilizing the California Emissions Estimator Model (CalEEMod v. 2022.1) and the trip generation data from the project Traffic and Circulation Study as recommended by the Ventura County Air Pollution Control District (VCAPCD). The estimated average daily emissions associated with the golf course are presented in Table 5.7-1.

TABLE 5.7-1 - ESTIMATED EXISTING ANNUAL GHG EMISSIONS

CO <sub>2</sub> e in Metric Tons per Year
0.0
0.0
962.0
0.8
293.0
1256.0

CalEEMod result sheets are provided in Appendix E.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact on GHG emissions if it would:

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

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change's "global" nature. Typical CEQA analyses address project actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects may be substantial, the GHG emissions from a single general development project would have no noticeable effect on global climate.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly "new" emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions, or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project's emissions. Rather, due to the "relocation" factor, new land use projects sometimes merely redistribute existing mobile emissions;<sup>3</sup> accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the "addition" of redistributed emissions to a new locale can make a substantial difference to overall air quality.

For greenhouse gas emissions and global climate change, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact. While the ARB published some draft thresholds several years ago, they were never adopted and the ARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

As discussed in the Air Quality section of this EIR, the City of Camarillo relies upon the expert guidance of the VCAPCD regarding the methodology and thresholds of significance for the evaluation of air quality impacts within Ventura County. GHG emissions are air pollutants that are subject to local control by the VCAPCD. As such, the City looks to the VCAPCD for guidance in the evaluation of GHG impacts.

In September 2011, the Ventura County Air Pollution Control Board requested that VCAPCD staff report back on possible GHG significance thresholds for evaluating GHG impacts of land use projects in Ventura County under CEQA. VCAPCD staff responded to this request by preparing a report entitled Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County. This

Revised Draft Environmental Impact Report

<sup>&</sup>lt;sup>3</sup> For example, a subdivision of 500 homes generates 5,000 new trips per day and those trips would be added to the local streets and intersections. In the case of climate change, the trips that are associated with those same 500 homes presumably would emit roughly the same volume of GHGs in the City of Camarillo as they would if they were traveling the same number of miles in Cleveland, Ohio. As a result, while raw vehicle trip counts occurring within a project area will accurately predict changes in congestion at intersections, the same certainty cannot be provided for climate change. The trips would certainly increase the number of vehicles passing through local intersections, but they will not increase the amount of GHG emissions into the world's atmosphere if those trips simply have been relocated from another location on the planet.

report presents a number of options for GHG significance thresholds and summarizes the most prominent approaches and options either adopted or being considered by all other air districts throughout California. Similar to other air districts, VCAPCD staff members are considering a tiered approach with the main components 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 members are also exploring an efficiency-based metric (e.g., GHG emissions per capita) for land use projects and plans. The South Coast Air Quality Management District (SCAQMD) is also considering these strategies for land use projects.

Given that Ventura County is adjacent to the SCAQMD jurisdiction and is a part of the Southern California Association of Governments (SCAG) region, VCAPCD staff believes it makes sense to set local GHG emission thresholds of significance for land use development projects at levels consistent with those set by the SCAQMD and the SCAG region. VCAPCD staff believe that adopting harmonized regional GHG emission thresholds would help streamline project review and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout most of Southern California.

The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO<sub>2</sub>e (MTCO<sub>2</sub>e) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

- **Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- **Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO<sub>2</sub>e/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO<sub>2</sub>e/year), commercial projects (1,400 MTCO<sub>2</sub>e/year), and mixed-use projects (3,000 MTCO<sub>2</sub>e/year). Under option 2 a single numerical screening threshold of 3,000 MTCO<sub>2</sub>e/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions by 2020 and 2035. The 2020 efficiency targets are 4.8 MTCO<sub>2</sub>e per service population for project level analyses

and 6.6 MTCO<sub>2</sub>e per service population for plan level analyses. The 2035 targets that reduce emissions to 40 percent below 1990 levels are 3.0 MTCO<sub>2</sub>e per service population for project level analyses and 4.1 MTCO<sub>2</sub>e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

**Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

However, for the purpose of evaluating the GHG impacts associated with this proposed project, this analysis utilizes the SCAQMD's draft tiered thresholds of significance. The SCAQMD's draft thresholds have also been utilized for other projects in Ventura County and the City of Camarillo.

## PROJECT IMPACTS AND MITIGATION MEASURES

## **Generation of GHG Emissions**

**Threshold**: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Impact**: The proposed project would generate greenhouse gas emissions but would not exceed the thresholds of significance recommended by the VCAPCD.

#### **Impact Analysis**

#### Tier 1

The proposed project is subject to CEQA, but no categorical exemptions are applicable to the project. Therefore, the analysis moves to Tier 2.

#### Tier 2

Neither the VCAPCD nor the City of Camarillo have adopted a GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. Therefore, the analysis moves to Tier 3.

#### Tier 3

The estimated annual operational GHG emissions associated with the proposed project (residential use and golf course operations) have been calculated utilizing CalEEMod and the trip generation data from

the project Traffic and Circulation Study recommended by the VCAPCD. These emissions are shown in Table 5.7-2. As shown, the net increase annual emissions would not exceed the draft 3,000 MTCO<sub>2</sub>e threshold for mixed-use and non-industrial projects. Therefore, the City of Camarillo, as lead agency, concludes that the GHG emissions generated in association with the proposed project would not have a significant impact on the environment.

TABLE 5.7-2 - ESTIMATED PROJECT ANNUAL GHG EMISSIONS

Emissions Source	CO2e in Metric Tons per Year
Construction	324.4
Area Sources	3.1
Energy Sources	475.0
Mobile Sources	2,312.0
Waste Disposal	46.9
Water and Wastewater	257.0
Total Project Emissions	3,418.4
Existing Project Site Emissions	1,256.0
Net Increase	2,162.4
SCAQMD Draft Tier 3 Threshold	3,000.0
Exceeds Threshold?	No

Construction emissions are amortized over 30 years in accordance with SCAQMD guidance  $(9,731 \text{ MTCO}_{2}\text{e}/30 \text{ years})$ .

The CalEEmod calculations assume the standard statewide engine tiers for the construction equipment operating at the site. The calculations do not assume the use of or requirement for newer engines that meet more stringent USEPA standards. This provides a more conservative analysis of potential construction-related GHG emissions.

The operational emissions shown in this table are the mitigated overall operational emissions totals shown in the CalEEMod results sheets, which assume building energy efficiency as required by Title 24 and the CalGreen Code.

CalEEMod result sheets are provided in Appendix E.

## **Consistency With GHG Plans**

**Threshold**: Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Impact**: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

## Impact Analysis

The 2022 Scoping Plan is the most recent plan adopted by the ARB to achieve carbon neutrality by 2045 or earlier. The strategies from the 2022 Scoping Plan are applicable to state, regional, and local agencies in the development of plans to reduce GHG emissions, but are not applicable to each and every new general development project. The general intent of these plans, however, is to reduce statewide anthropogenic GHG emissions to 85 percent below 1990 levels by 2045. Strategies and measures have been also been implemented on the state level by example of the new Title 24 CalGreen Code and on the local level by the Camrosa Water District's Water Conservation Ordinance.

Although not originally intended to specifically reduce air pollutant emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2022 Title 24 standards (effective as of January 1, 2023) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2023 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the CALGreen Code.

Based on this information, the proposed project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. The impact of the proposed project would be less than significant.

#### **CUMULATIVE IMPACTS**

As discussed above, emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The state has mandated a goal of reducing state-wide emissions to 85 percent below 1990 levels by 2045, even though state-wide population and commerce is expected to grow substantially. As discussed above, the proposed project does not exceed the draft thresholds of significance for mixed-use and non-industrial projects. Therefore, the contribution of the project to the cumulative effect of global climate change is not considered to be cumulatively considerable.

## UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant impacts associated with GHG emissions.

# HAZARDS AND HAZARDOUS MATERIALS

#### **SUMMARY**

Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Implementation of the proposed project could 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. Measures are recommended to reduce this potential impact to a less than significant level.

Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Implementation of the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

Implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area due to aircraft operations.

Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The proposed project would not expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires.

## INTRODUCTION

The following analysis is based upon the *Phase I Environmental Site Assessment, Camarillo Springs Country Club, 791 Camarillo Springs Road, Camarillo, CA 93012* (Phase I ESA) prepared by Stantec Consulting Services, Inc., January 10, 2020, the City of Camarillo Safety Element 2013, and the Updated Emergency Evacuation Analysis for the *Camarillo Springs Golf Course Project, City of Camarillo* (Updated Emergency Evacuation Analysis) prepared by Associated Transportation Engineers, March 8, 2023. The City of Camarillo has independently reviewed and allowed for public review the information presented in the

Phase I ESA and the Updated Emergency Evacuation Analysis. A copy of the Phase I ESA is provided as Appendix N to this EIR while the Updated Emergency Evacuation Analysis is provided as Appendix W.

#### **ENVIRONMENTAL SETTING**

## **Project Site Description**

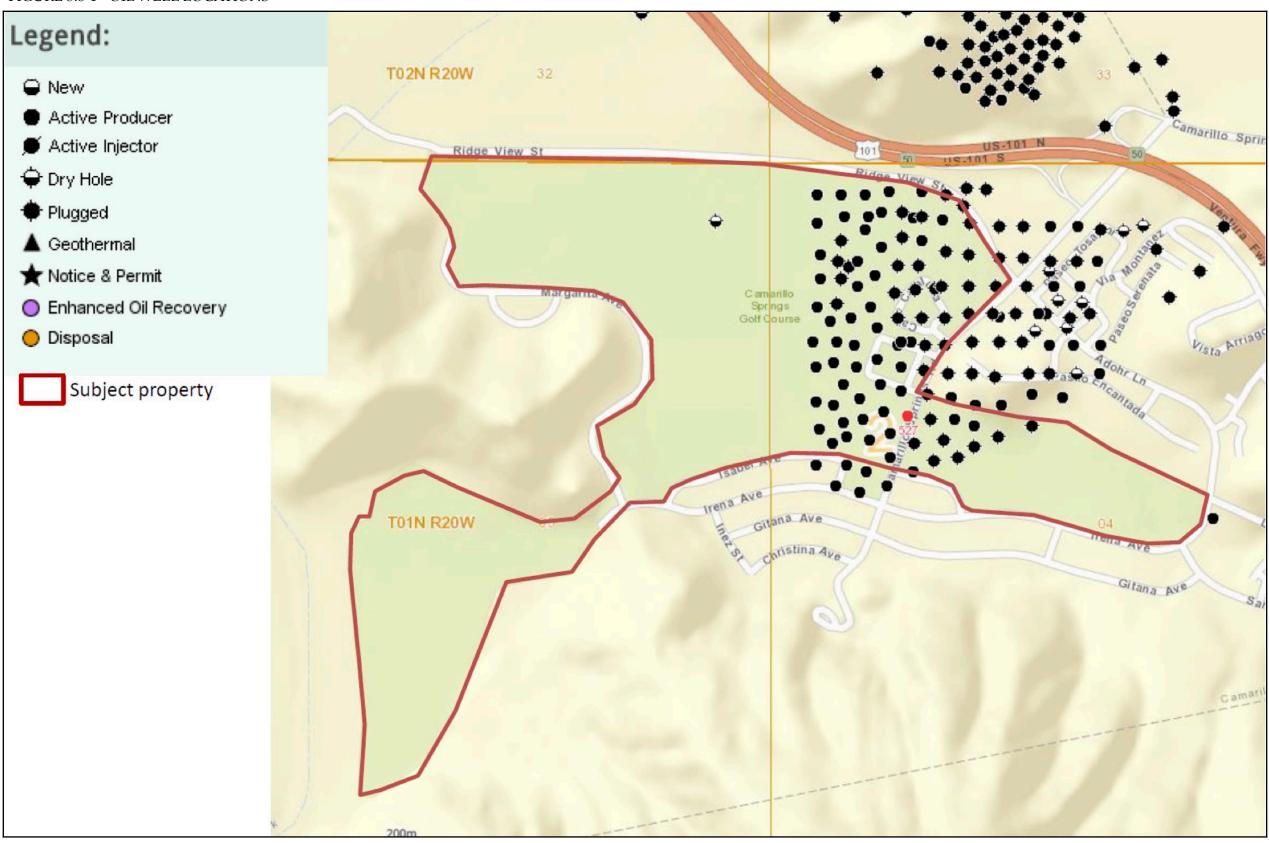
Camarillo Springs Golf Course is a 182-acre, privately-owned facility that has been developed and operational for more than 45 years. The property is comprised of nine legal parcels and is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures. The existing parcels are illustrated in Figure 3-4. The golf course is open for public use and play, as well as tournaments, and its hours of operation are from sunrise until sundown, seven days per week.

## Potential Hazardous Materials at the Project Site

Prior to development as a golf course, the property was used for agricultural purposes. The property is also located within the Conejo Oil Field and there are approximately 210 oil wells within 1/4 mile of the golf course. Approximately 94 wells are recorded on State records as having been drilled in the past within the north-northeastern portion of the property; 61 of these wells are listed as active producer wells. The locations of oil wells are depicted in Figure 5.8-1.

Three types of wells are mapped in the area of the project site: "active producer," "active injector," and "plugged." In the case of "active producer" and "active injector" wells, this designation does not necessarily mean that the wells are currently in use. Rather, these terms are used by the California Geologic Energy Management Division (CalGEM) [formerly known as the Division of Geologic and Geothermal Reserves (DOGGR)] to refer to wells that have been drilled, but for which no formal abandonment records are on file. Those wells may be idle or may have been abandoned with no accompanying documentation filed with the State. Currently, no oil production or oil field injection activities occur within the property, and no physical oil production facilities or equipment were observed within the project site during a site visit. Therefore, for purposes of this analysis, it is assumed that all of the wells mapped as "active producer" or "active injector" are no longer present on site and have been abandoned.

FIGURE 5.8-1 - OIL WELL LOCATIONS



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5.8-4 Camarillo Springs GPA 2017-2

As shown in greater detail in Figure 5.8-2, all but two of the wells are located outside of the area proposed for residential development. Figure 5.8-2 shows the location of a "dry hole" that is located in the central area proposed for residential development. As the name indicates, this represents the location where attempts to drill a well may have occurred but since the boring identified that it would not produce oil or was not needed or suitable for an injection well, a well was not ultimately drilled at this location and the location has been abandoned. In addition, a second abandoned well is located in the eastern-most area proposed for residential development.

In a records review for historic activities, a California Hazardous Materials Incident Reporting System (CHMIRS) listing indicates that a leak of crude oil was discovered in March 1995 from a former oil well. Maintenance crew of the golf course observed oil come up through the green and reported it to the Ventura County Environmental Health Division. However, there are no records available from the Ventura County Environmental Health Division that identify what was done to address the potential leak.

In addition, the California Department of Conservation, Geologic Energy Management Division (CalGEM), was contacted in May 2019 to investigate globs of oil floating on a pond on the 12th hole of the golf course. CalGEM staff met with representatives of the California Department of Fish and Wildlife (CDFW) to investigate the site. CalGEM staff state that the CDFW deemed that there was no harm to wildlife or the environment at the time.<sup>1</sup>

CalGEM was again contacted in November 2019 about a seep at approximately the same location. CalGEM staff investigated the site and found the pond nearly drained with an absorbent boom around the seeps near the shoreline of the pond. Old records and aerial photographs from the 1920s to the present were reviewed by CalGEM staff to try and pinpoint the source of the seep. Aerial photographs did not depict any potential well in the vicinity of the seep. Well records were also reviewed. Natural seepage is known in this area.<sup>2</sup> Consequently, the golf course property owner (not the applicant for the Camarillo Springs GPA 2017-2 project) has been working with a geotechnical firm and CDFW staff to develop a work plan to backfill the pond and provide immediate mitigation for the threat that the oil seep poses to wildlife. This effort is discussed in greater detail in the Environmental Setting section of this EIR.

A site survey was conducted as part of the Phase I ESA preparation. Two 1,000-gallon above ground storage tanks (ASTs) holding diesel fuel were observed in the northwestern corner of the property within the maintenance facility area. The ASTs appeared in good condition without any indication of leaking or staining. Three large drums (>50 gallons) of hydraulic oil were observed in the maintenance facility area. The drums appeared in good condition without any indication of leaking or staining. Gasoline odors were detected amongst the maintenance facility vehicles stored in the maintenance area.

<sup>&</sup>lt;sup>1</sup> Patricia A. Abel, letter to Steve Butler, April 8, 2020.

<sup>&</sup>lt;sup>2</sup> Ibid.

Fertilizer was observed along the northern part of the maintenance facility area and a locked room containing pesticides was observed in the maintenance area. The fertilizer and pesticides are routinely used in golf course maintenance throughout the property.

A 1,000-gallon underground storage tank (UST) was removed from the property in 1996. During the UST removal, soil was excavated to a depth of 12.5 feet below ground surface. A Remedial Action Completion Certification was issued by the County of Ventura Resource Management Agency in July 1997; however, no soil vapor sampling was conducted. Additionally, a previous ESA of the property stated there was a solvent degreaser used by maintenance staff.

## Potential Hazardous Materials in the Local Vicinity

The Phase I ESA researched individual facilities in the local vicinity that have the potential to pose a risk to the golf course property. The research identified the following four facilities:

- 5th Avenue Dry Cleaning (1999-2014)
- De Fina Emma (service station 2004-2007)
- Main Street Cleaners (2006-2014)
- Harman Ranch (citrus orchard current)

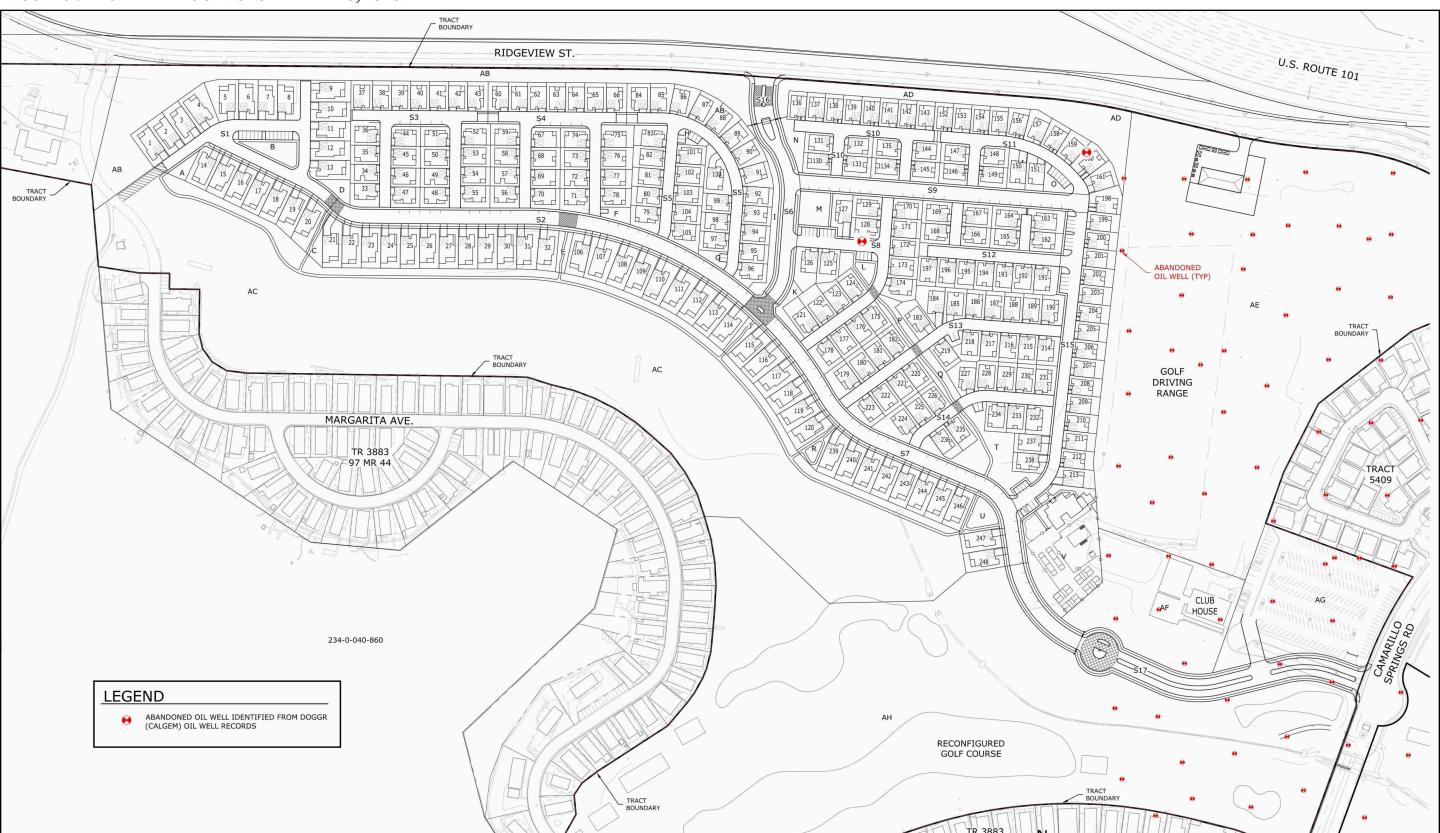
Based on one or more of the following reasons: distance from the property, position of sites with respect to assumed groundwater flow direction, the native soils, and regulatory status, none of the nearby facilities are expected to affect soil or groundwater quality at the property.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact on hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- 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.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

FIGURE 5.8-2 - OIL WELL LOCATIONS AT THE PROJECT SITE



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5.8-8 Camarillo Springs GPA 2017-2

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- 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 or excessive noise for people residing or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires.

## PROJECT IMPACTS AND MITIGATION MEASURES

## **Routine Use and Transport of Hazardous Materials**

**Threshold**: Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Impact**: Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

#### **Impact Analysis**

#### **Construction-Related Impacts**

Construction of the proposed project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

#### **Operational Impacts**

Golf course operations would continue to use and store fuels for maintenance vehicles and fertilizer and pesticides for routine maintenance. These materials are already used and stored at the property. The proper use and storage of these products as required by existing regulations would not create a significant hazard to the public living near the golf course property and the potential impact would be less than significant.

The only potentially hazardous materials that would be used on a regular basis in the new residential area would be cleaning and landscaping products that are common to typical residential developments.

The proper use and storage of these products as required by existing regulations would would not create a significant hazard to the public living near the project site and the potential impact would be less than significant.

#### **Release of Hazardous Materials**

**Threshold**: Would the proposed project 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?

**Impact**: Implementation of the proposed project could 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. Measures are identified to reduce this potential impact to a less than significant level.

#### **Impact Analysis**

The historic use of herbicides and pesticides for agriculture and golf course maintenance is considered a recognized environmental condition to the property. The disturbance of the soils during site clearing and grading activities could expose nearby residents to concentrations of these materials. This is a potentially significant impact.

As discussed previously, A 1,000-gallon gasoline UST was removed from the property in 1996. Additionally, a solvent degreaser was reported present and used for equipment maintenance. Due to a lack of soil vapor data from the UST removal, there is the potential that gasoline and degreaser materials may still be present in the soil. Release of these materials during site clearing and grading would be a potentially significant impact.

The presence of active and former oil wells within the project site boundary and within 1/4 mile radius is considered a recognized environmental condition. Disturbance of wells used for oil production (as opposed to abandoned injector wells which traditionally only injected water into the ground) during site grading could release petroleum materials into the environment. Also, any new development in the vicinity of the former oil wells may require the former oil wells to be re-abandoned to current CalGEM Idle Well Program standards or may require construction setbacks from the well casings. In addition, there is the potential for petroleum vapors from the wells to have migrated within the property. Release of petroleum vapors during site clearing and grading would be a potentially significant impact. As noted previously, there are no active wells on site, and none of the wells are within the footprint of the project area proposed for residential development. The mapped wells are located on the golf course component of the project which is currently being used as a golf course.

CamGEM advises that all wells identified on a development parcel prior to, or during development activities be tested for liquid and gas leakage. Surveyed locations should be provided to CalGEM in

Latitude and Longitude, NAD 83 decimal format. CalGEM expects any wells found leaking to be reported to it immediately. Failure to plug and re-abandon the well may result in enforcement action, including an order to perform re-abandonment well work, pursuant to PRC sections 3208.1, and 3224.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth by CalGEM. The PRC continues to define the person or entity responsible for re-abandonment as:

- 1. The property owner If the well was plugged and abandoned in conformance with DOGGR or CalGEM requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
- 2. The person or entity causing construction over or near the well If the well was plugged and abandoned in conformance with DOGGR or CalGEM requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the reabandonment.
- 3. The party or parties responsible for disturbing the integrity of the abandonment If the well was plugged and abandoned in conformance with DOGGR or CalGEM requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet

below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

## Mitigation

The following mitigation measure is recommended to address the potential release of herbicides and pesticides during site clearing and grading activities:

HM-1 Prior to the issuance of grading permits, the project developer shall have a Phase II Environmental Site Assessment prepared and completed to evaluate whether residual pesticides or heavy metals associated with historical herbicide applications are present above regulatory residential screening levels, human health risk criteria or California hazardous waste levels. Composite soil samples should be collected on one-acre centers within the property with historical agricultural use. Soil samples should be collected at 1.0 and 3.0 feet below ground surface (bgs) for analysis of organochlorine pesticides (OCPs) and associated heavy metals. The 1.0 feet bgs sample should be submitted to the laboratory and analyzed for organochloride pesticides and lead and arsenic related to historic agricultural uses. The remaining 3.0 feet soil samples collected should be placed on hold pending the analytical results of the first round of soil samples. Soil samples for OCPs and heavy metals should be analyzed by EPA test methods 8081 and 6010. If the samples identify any areas where residual pesticide or heavy metal readings exceed the applicable screening levels or human health standards, the project developer shall prepare and submit to the City a soil management and remediation program to reduce the readings to acceptable levels by measures such as removal of the contaminated soils to an off-site Class III landfill, implementation of a soil management program to reduce the concentrations present, or leaving the material in place and capping it with clean fill material.

The following mitigation measure is recommended to address the potential release of gasoline and degreaser materials from the location of the previous 1,000-gallon UST during site clearing and grading activities:

HM-2 Prior to the issuance of grading permits, the project developer shall conduct a geophysical survey and collection of soil vapor and soil samples to evaluate any impact from these features. Soil samples should be analyzed for TPH (full scan) and VOC analysis by U.S. EPA test methods 8015M and 8260 along soil vapor for VOC and TPHv analysis by EPA test method TO-15. Analytical results should be compared to regulatory screening level for commercial and residential land use set by the United States Environmental Protection Agency (US EPA), Region 9 Regional Screening Levels (RSLs), dated November 2019 or Department of Toxic Substance Control (DTSC) Hero Note #3, dated April 2019. If the samples identify any areas where the soil or soil vapor readings exceed the applicable screening levels or human health standards, the

project developer shall prepare and submit to the City a soil management and remediation program to reduce the readings to acceptable levels.

The following mitigation measures are recommended to address the potential release of well petroleum materials and vapors during site clearing and grading activities:

- HM-3 Prior to the issuance of grading permits, the project developer shall conduct a subsurface investigation including a geophysical survey and soil sampling to evaluate potential impact associated with the former oil wells. If any soil requiring remediation due to presence of the wells is identified, the project developer shall prepare and submit to the City a soil management and remediation program to remediate the soil to acceptable levels by measures such as removal of the contaminated soils to an off-site Class III landfill, implementation of a soil management program to reduce the concentrations present, or leaving the material in place and capping it with clean fill material. If any wells are identified, the project developer shall comply with Mitigation Measure HM-4.
- HM-4 Prior to the issuance of grading permits, the project developer shall have all wells identified within the project site tested for liquid and gas leakage. Any wells found leaking shall be reported to CalGEM immediately. The developer shall submit a report of findings to CalGEM and the City of Camarillo. Surveyed locations shall be provided in Latitude and Longitude, NAD 83 decimal format.
- HM-5 Prior to the issuance of grading permits, the project developer shall submit to the City of Camarillo a report that identifies all oil wells in the vicinity of the grading and construction areas and that specifies whether the wells are to be re-abandoned to current CalGEM Idle Well Program standards or whether grading and construction setbacks are being provided from the well casings.

#### Mitigation Monitoring

The Department of Community Development shall review the technical reports to ensure that they address the requirements of mitigation measures HM-1 through HM-5.

## Impact After Mitigation

Compliance with all applicable standards for the treatment of soils and wells would reduce the potential impacts of the project to less than significant levels.

#### Release of Hazardous Materials Near Schools

**Threshold**: Would the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**Impact**: Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

## Impact Analysis

There are no existing or proposed schools located within the Camarillo Springs area or within one-quarter mile of the project site. No impact would occur.

#### **Hazardous Materials Sites**

**Threshold**: Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Impact**: Implementation of the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

#### Impact Analysis

Based on the research conducted for the Phase I ESA, the project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

#### Aircraft Hazards

**Threshold**: 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 or excessive noise for people residing or working in the project area?

**Impact**: Implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area due to aircraft operations.

#### Impact Analysis

The Camarillo Springs area is located within the general flight paths of Camarillo Airport and the Approach/Departure Clearance Zones for Runway 03/21, the primary runway at the Naval Base Ventura County Point Mugu airfield but is located outside of the airport land use plan areas for these airports. There are no private airstrips located within the vicinity of Camarillo. No impact would occur.

# **Emergency Evacuation**

**Threshold**: Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

**Impact**: Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

#### **Impact Analysis**

According to the City of Camarillo Safety Element 2013, evacuation routes in Camarillo are dependent upon the event and need for evacuation. During a breach of the Bard Reservoir, the only required evacuation route would be the movement onto high ground out of the flood plain, which is generally north of Ponderosa Road, westerly of Ponderosa and Las Posas Roads and easterly of Calleguas Creek northerly of the Ventura Freeway (U.S. 101). In the event of a major chemical spill or other significant disaster, the City would be evacuated using U.S. 101 for east and westerly traffic or Lewis Road for evacuating the residents to the north or south. The proposed project would not alter any vehicular circulation routes external to the project site, or impede public access or travel upon public rights-of-way. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This would be a less than significant impact.

The Camarillo Springs area is an isolated community within the City of Camarillo. The City of Camarillo requested an evaluation of an emergency evacuation of the Camarillo Springs community assuming a major catastrophe (fire, flood, earthquake, etc.) is in order to evaluate the time required for 100% evacuation of the community. It is noted that the following evacuation analysis is based on assumptions that may or may not represent real evacuation situations and is, therefore, not an operations plan for a real evacuation situation.

Access to the Camarillo Springs community is limited to two primary routes: 1) the U.S. Highway 101/Camarillo Springs Road interchange and 2) the Ridge View Street-Adohr Lane connection to Pancho Road. Emergency evacuation times were evaluated assuming three evacuation scenarios: 1) assuming that the connection to U.S. Highway 101 is blocked, 2) assuming that the Ridge View Street-Adohr Lane connection is blocked, and 3) assuming that both connections are open.

#### **Traffic Generation**

Evacuation traffic flows were forecast based on the population of the Camarillo Springs area on a typical weekday when the office and retail commercial uses in the community are most active (versus overnight periods and weekend periods when those uses are less active). According to U.S. census tract data, there are 967 residential units, 73,390 square feet of business center (office) space, 21,400 square feet of commercial retail space, and the 18-hole golf course within the Camarillo Springs area.

The next step in the analysis converts the population within the community to the number of vehicles that would be active during the evacuation period. The analysis assumes that 50% of the community residents would be located outside of the community, receive notification of the disaster, return to their homes to gather valuables, pets, etc., and then evacuate the community. The analysis also assumes that 75% of the residential units would evacuate in one vehicle and 25% would evacuate in two vehicles. The number or vehicles evacuating the non-residential uses (commercial, office, and golf course) were calculated based on parking lot space counts and occupancies. Table 5.8-1 summarizes the existing number of inbound and outbound vehicles that are forecast for the 100% evacuation scenario.

TABLE 5.8-1 - CAMARILLO SPRINGS EMERGENCY EVACUATION TRAFFIC GENERATION - EXISTING CONDITIONS

Land Use	Dwelling Units/ Square Feet Inbound Vehicles		Outbound Vehicles				
Existing Residential	967 Units 484		1,209				
Existing Business Center	73,390 Square Feet	0	136				
Existing Commercial Center	21,400 Square Feet	0	35				
Existing Golf Course	18 Holes	0	66				
Totals		484	1,446				
Source of table data: Associated Transportation Engineers, March 8, 2023.							

Table 5.8-2 summarizes the number of inbound and outbound vehicles that are forecast for the 100% evacuation scenario with the proposed project.

TABLE 5.8-2 - CAMARILLO SPRINGS EMERGENCY EVACUATION TRAFFIC GENERATION - EXISTING + PROJECT CONDITIONS

Land Use	Dwelling Units/ Square Feet	Inbound Vehicles	Outbound Vehicles	
Existing Residential	967 Units	484	1,209	
Existing Business Center	73,390 Square Feet	0	136	
Existing Commercial Center	21,400 Square Feet	0	35	
Existing Golf Course	12 Holes	0	44	
Proposed Project	248 Units	124	310	
Totals		608	1,734	

Source of table data: Associated Transportation Engineers, March 8, 2023.

#### Scenario 1 - U.S. Highway 101 Access Blocked

This scenario assumes that access to /from U.S. Highway 101 is not available (no access to U.S. Highway 101 eastbound and westbound ramps). Evacuation would occur solely via the Ridge View Street-Adohr Lane connection to Pancho Road (which connects to Pleasant Valley Road to leave the area). The highest concentration of traffic, and therefore a potential bottleneck, would occur on the segment of Ridge View Street just west of the project site. Under existing conditions, a total of 484 vehicles would be inbound to the community (residents that are outside of the community and return home to gather valuables assuming that they would be allowed by emergency personnel) and 1,446 vehicles would be outbound during the evacuation event. For Existing + Project conditions, the volumes would increase to 608 inbound vehicles and 1,734 outbound vehicles.

The analysis assumes that emergency evacuation due to a large disaster near or within the community would require immediate evacuation and be facilitated by emergency personnel (e.g. police, fire, designated personnel). The evacuation scenario assumes that emergency personnel would be present to alert residents to evacuate and to direct traffic into/out of the community via the Ridge View Street-Adohr Lane route as well as at key intersections within the community (e.g. Ridge View Street-Adohr Lane/Pancho Road) to maximize flow rates. Assuming a street network capacity that would accommodate 1,700 inbound + 1,700 outbound vehicles per hour, the existing 484 inbound vehicles could reach their homes in approximately 17 minutes and the 1,446 outbound vehicles could evacuate the community in approximately 51 minutes. With Existing + Project traffic, the inbound travel time would increase to 22 minutes and the outbound evacuation time would increase to 61 minutes. The project's traffic additions would account for approximately 20% of the inbound traffic flows and 18% of the outbound traffic flows.

# Scenario 2 - Ridge View Street-Adohr Lane Access Blocked

This scenario assumes that access to both sides of U.S. Highway 101 (northbound and southbound) would be available and access via the Ridge View Street-Adohr Lane connection to Pancho Road would be blocked. The highest concentration of traffic, and therefore a potential bottleneck, would occur on the segment of Camarillo Springs Road just south of the U.S. Highway 101 eastbound ramps, which contains four lanes. This analysis assumes a street network capacity that would accommodate 3,400 inbound + 3,400 outbound vehicles per hour. Based on this roadway capacity estimate, the existing 484 inbound vehicles could reach their homes in approximately 9 minutes and the 1,446 outbound vehicles could evacuate the community in approximately 26 minutes. With existing + project traffic, the inbound travel time would increase to 11 minutes and the outbound evacuation time would increase to 31 minutes. The project's traffic additions would account for approximately 20% of the inbound traffic flows and 18% of the outbound traffic flows.

#### Scenario 3 - No Access Blocked

This scenario assumes that access to both sides of U.S. Highway 101 and Ridge View Street-Adohr Lane are open. Assuming that emergency personnel would be present to alert residents to evacuate and to direct traffic to evacuate via U.S. Highway 101 or Ridge View Street-Adohr Lane, the maximum flow rates would be 3,400 inbound + 3,400 outbound vehicles per hour on Camarillo Springs Road and 1,700 inbound + 1,700 outbound vehicles per hour on Ridge View Street-Adohr Lane. Based on this roadway capacity estimate, the existing 484 vehicles inbound vehicles could reach their homes in approximately six minutes and the existing 1,446 outbound vehicles could evacuate the community in approximately 17 minutes. With existing + project traffic, the inbound travel time would increase to 7 minutes and the outbound evacuation time would increase to 20 minutes. The project's traffic additions would account for approximately 20% of the inbound traffic flows and 18% of the outbound traffic flows.

Table 5.8-3 summarizes the emergency evacuation times for the existing population and existing + project population. The table also summarizes the net increase in evacuation times with the Project.

TABLE 5.8-3 - CAMARILLO SPRINGS EMERGENCY EVACUATION TIMES								
Scenario	Existing Population		Existing + Project Population		Net Increase			
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound		
Scenario 1 U.S. 101 Access Blocked	17 min.	51 min.	22 min.	61 min.	5 min.	10 min.		
Scenario 2 Ridge View Street-Adohr Lane Acces Blocked	9 min.	26 min.	11 min.	31 min.	2 min.	5 min.		
Scenario 3 No Access Blocked	6 min.	17 min.	7 min.	20 min.	1 min.	3 min.		
Source of table data: Associated Transportation Engineers, March 8, 2023.								

The County Office of Emergency Services (OES) under the Sheriff's Department is responsible for evacuations in Ventura County. There are no official standards for evacuation times. The OES only requires that there be multiple ingress/egress routes to allow for evacuations. As demonstrated in the preceding analysis, the multiple routes allow for evacuation of the Camarillo Springs Community. The proposed project would not change the existing roadways surrounding the site and would not eliminate any existing evacuation routes.

#### Wildfire

**Threshold**: Would the proposed project expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires?

**Impact**: The proposed project would not expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires.

# **Impact Analysis**

A more comprehensive discussion on potential wildland fire impacts is provided in the Wildfire section of this EIR. As discussed in the Wildfire section, residents of the proposed project, as with all residents of the Camarillo Springs community, would be exposed to smoke and pollutant concentration from a wildfire in the nearby hills. However, the project would occur within the existing boundaries of the Camarillo Springs Golf Course property and would not directly affect any areas of the nearby fire hazard zones. As such, the project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The impact of the project would be less than significant.

# **CUMULATIVE IMPACTS**

Development of the proposed project in combination with projects elsewhere in Camarillo has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials throughout the City. However, the potential impact associated with the proposed project would be less than significant and, therefore, not cumulatively considerable. As with the proposed project, the potential presence of hazardous substances associated with other related projects would require evaluation on a case-by-case basis in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with related projects. Therefore, with compliance with local, state and federal laws pertaining to hazardous materials, the proposed project in conjunction with other project throughout Camarillo would be expected to result in less than significant cumulative impacts with respect to hazards and hazardous materials.

At the present time, the only other related projects within the Camarillo Springs area are the request to modify the conditional of approval for the Village Greens Market located at 795 Camarillo Springs Road and the work plan to backfill Pond 7 at Camarillo Springs Golf Course. The work plan is proposed to eliminate the risk to local wildlife such as water fowl and amphibians that can come into contact with water features that may contain oil. No other new development project is proposed or approved within the Camarillo Springs area. As such, no significant cumulative impacts associated with hazards and hazardous materials in the Camarillo Springs area are expected.

# **UNAVOIDABLE SIGNIFICANT IMPACTS**

The proposed project would not create any unavoidable significant impacts to hazards and hazardous materials.

# HYDROLOGY AND WATER QUALITY

# **SUMMARY**

Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces, and could result in substantial erosion or siltation onsite or offsite. Mitigation is identified to reduce this impact to a less than significant level.

Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite.

Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff.

Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could impede or redirect flood flows.

The proposed project would be located in an existing flood hazard zone but would remove the development area from the flood hazard zone and reduce the release of pollutants due to project inundation.

Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

# INTRODUCTION

The following analysis is based upon the following reports and references:

- Camarillo Springs Golf Course Master Drainage Plan and Floodplain Analysis (Master Drainage Plan), prepared by Pacific Advanced Civil Engineering, Inc., April 2022.
- Ventura Countywide Stormwater Quality Program Post-Construction Stormwater Management Plan (PCSMP) for Camarillo Springs TTM 6016 (SW#0034), Parcel #234-004-0-59, prepared by Encompass Consulting Group. Approved March 5, 2019 (Revised June 2020).
- Camarillo Springs Golf Course FEMA Conditional Letter of Map Revision (CLOMR), prepared by Pacific Advanced Civil Engineering, Inc., April 2019.
- Camarillo Springs Proposed Development Project No Change Necessary to Master Drainage Plan for Pond 7 Backfill Project (Pond 7 Backfill Project Letter), prepared by Pacific Advanced Civil Engineering, Inc., March 23, 2023.
- City of Camarillo Safety Element 2013, prepared by RBF Consulting, adopted May 8, 2013.
- Letter to Michael Brown of Cadence Environmental Consultants, from Hassan Kasraie, PE and Rich Gleason, PE of Kasraie Consulting regarding Camarillo Springs Golf Course New Urban West, Inc. 3rd Party Drainage Review Final Observations (Kasraie Consulting Letter). October 14, 2022.

The City of Camarillo has independently reviewed and allowed for public review the information presented in the Master Drainage Plan, PCSMP, and CLOMR. A copy of the Master Drainage Plan is provided as Appendix N to this EIR, the PCSMP is provided as Appendix O, the CLOMR is provided as Appendix P, the Pond 7 Backfill Project Letter is provided as Appendix Q, and the Kasraie Consulting Letter is provided as Appendix R.

While the Federal Emergency Management Agency (FEMA) and the Ventura County Watershed Protection District (VCWPD) have performed technical feasibility reviews of the technical reports to date, their involvement in the final determination of the project's proposed revision to the flood hazard areas is not completed. The CLOMR application material was reviewed by City staff to verify it met the general requirements for submittal to FEMA. City requirements related to stormwater hydrology, hydraulics, drainage and flooding must be met through the entitlement, design review and construction processes before a final determination can be made by FEMA to issue a final Letter of Map Revision (LOMR) which effectuates any modifications to the flood zone. Any possible removal of properties from a Special Flood Hazard Area floodplain can happen only if FEMA revises the flood maps with a LOMR, which can only happen when FEMA gives final determination and approval that the grading and improvements identified in the FEMA approved CLOMR have been completed with verification by the City. An outstanding FEMA requirement before issuance of the CLOMR is for the City (in its role as floodplain

administrator) to publish a public notice of the development's intent to modify the floodway/FIRM map. The City will not publish this public notice until after the project has received full entitlement approval by City Council including conditions of approval specific to stormwater hydrology, hydraulics, and drainage. If any proposed buildings, currently shown on the proposed Tentative Map within a fault hazard study zone, are relocated to be within a FEMA 100-year floodplain, then the Master Drainage Plan/Floodplain Analysis must be updated along with the CLOMR.

The project applicant has also submitted hydrology and hydraulic modeling and analysis to the VCWPD for review relative to Conejo Creek, a jurisdictional channel of the VCWPD. Further detailed hydrology and hydraulic calculations and modeling will be required as part of the review of the specific design of the project, and prior to any associated approvals by the VCWPD, FEMA, and the City.

# **ENVIRONMENTAL SETTING**

# Regional and Local Watershed

Camarillo Springs Golf Course is located within the local 1,111-acre Camarillo Springs Creek watershed, tributary to the 48,122-acre Conejo Creek regional watershed, which is part of the larger Calleguas Creek regional watershed illustrated in Figure 5.9-1.

# Floodplain

Portions of the golf course and adjacent areas are located within a 100-year Federal Emergency Management Agency (FEMA) floodplain resulting primarily from overbank flow from Conejo Creek but are also affected by tributary runoff flowing through the golf course from the local Camarillo Springs Creek watershed. The existing FEMA floodplain is illustrated in Figure 5.9-2. As shown, there are approximately 154 existing mobile homes located to the south and southwest of the golf course within the existing 100-year FEMA floodplain. The existing peak flood depths are illustrated in Figure 5.9-3.

# Groundwater

As discussed in the Geology and Soils section of this EIR, groundwater was encountered in a previous, adjacent geotechnical investigation at an elevation of about 107 feet. However, the PCSMP concludes that the groundwater levels at the site are high and there is no applicable place for infiltration.

The golf course is irrigated by private water from existing wells located adjacent to Conejo Creek along the westerly edge of the golf course - south area of the project site.

# **Historical Natural Hazards**

Historically, the Camarillo Springs area has experienced numerous natural hazard events including fires, local (Camarillo Springs Creek) and regional (Conejo Creek) flooding, hillside instability, and debris flow. These events include Conejo Creek/Camarillo Springs Creek flooding in March 1983, which is shown in Figure 5.9-4. In May 2013, the Springs Fire burned through and eliminated much of the vegetation along the surrounding slopes, increasing the likelihood of hillside instability. Heavy and intense rainfall events swept through the area in November and December of 2014 creating substantial public safety hazard events that resulted in substantial residential and general infrastructure damage due to mud and debris flows. Photographs recorded by City staff showing the mud and debris flows are provided in Figure 5.9-5. As a result, the City of Camarillo has had to issue proclamations of local emergency and has invested substantial capital in the installation of numerous debris flow control systems to protect existing homes in the Camarillo Springs area.

# Regulatory Setting

#### Federal Clean Water Act

The Federal Water Pollution Control Act (commonly known as the Clean Water Act [CWA]) requires states to conduct water quality assessments of water resources. These assessments are used to identify water bodies that do not meet Federal water quality standards, and which are placed on a list of impaired waters pursuant to Section 303(d) of the CWA. In 1972, the CWA was amended to require National Pollutant Discharge Elimination System (NPDES) permits for the discharge of pollutants to "waters of the U.S." from any point source. In 1987, the CWA was amended again to require that the U.S. Environmental Protection Agency (USEPA) establish regulations for permitting under the NPDES permit program of municipal and industrial storm water discharges. On November 16, 1990, the USEPA published final regulations for storm water discharges associated with industrial activity, for construction activities on five acres or more, and from large municipal separate storm sewer systems (MS4). An MS4 is a conveyance or system of conveyances, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains. MS4s are owned or operated by a public body that has jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes. The MS4s are only designated or used for collecting or conveying storm water (i.e., not wastewater or combined sewage). In 1998, individual NPDES permits were required for storm water discharges associated with industrial activities. In 1999, regulations were adopted to address storm water discharges from small MS4s and construction sites that are one acre or more.

FIGURE 5.9-1 - REGIONAL AND LOCAL WATERSHED HYDROLOGY MAP

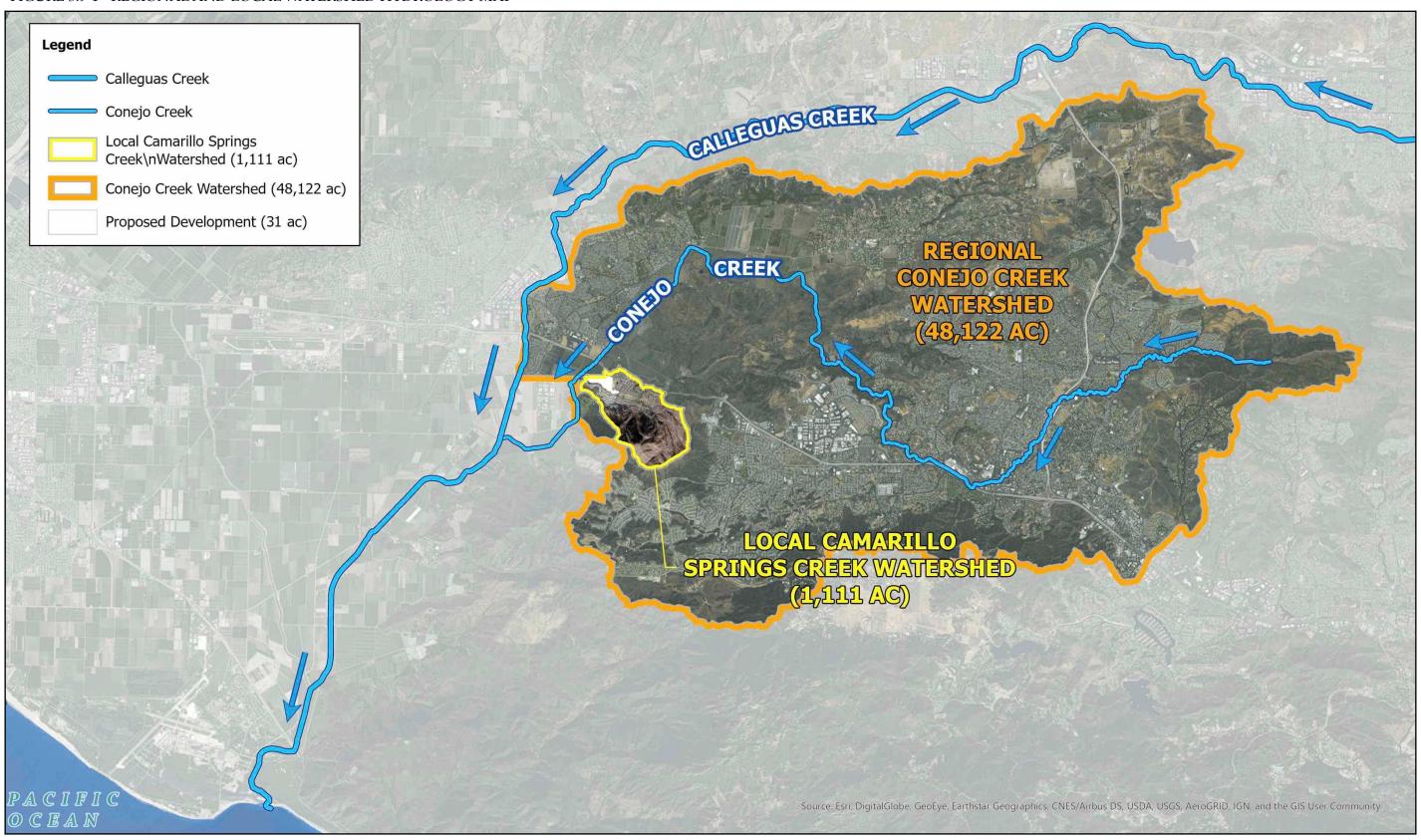
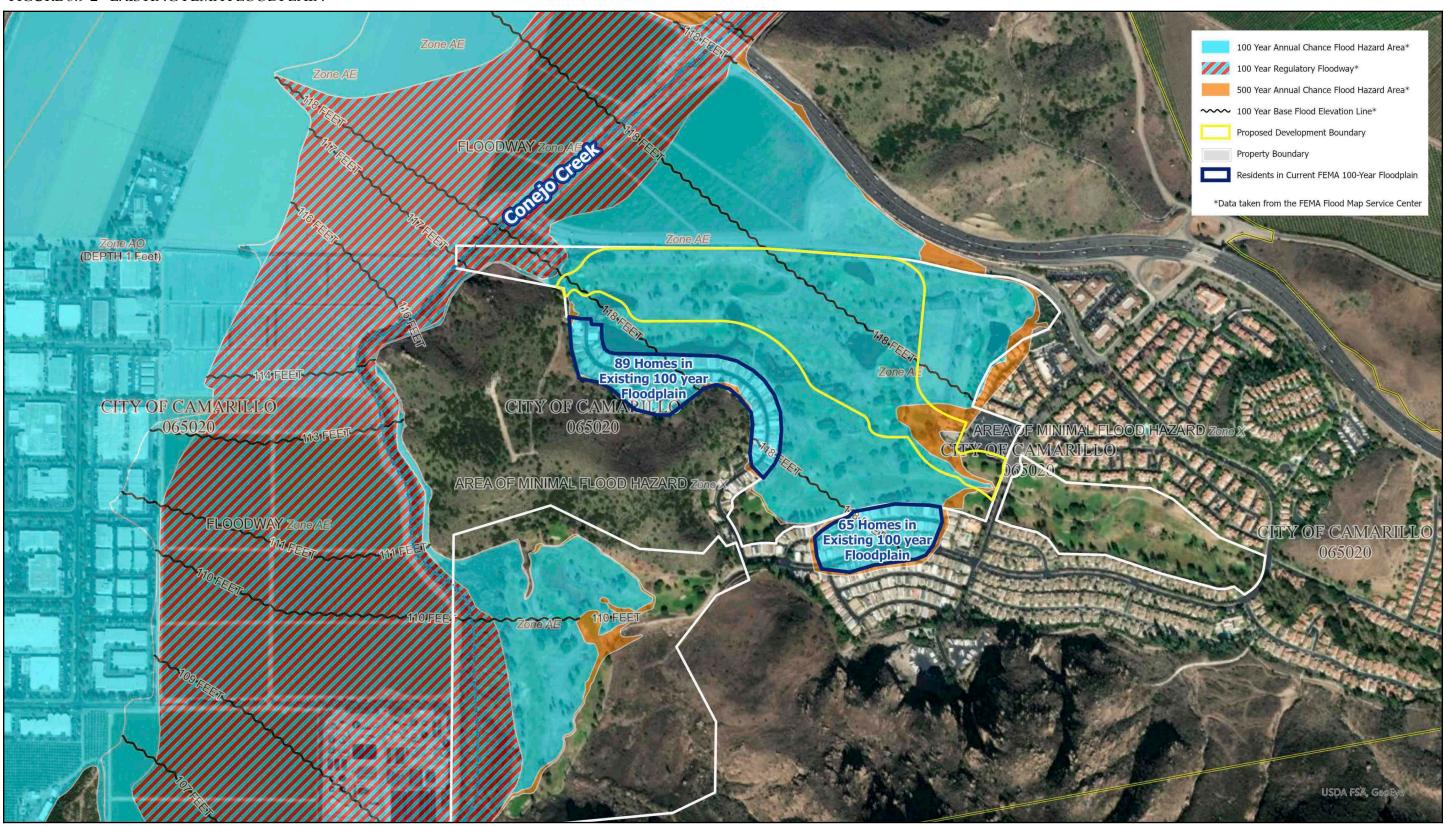
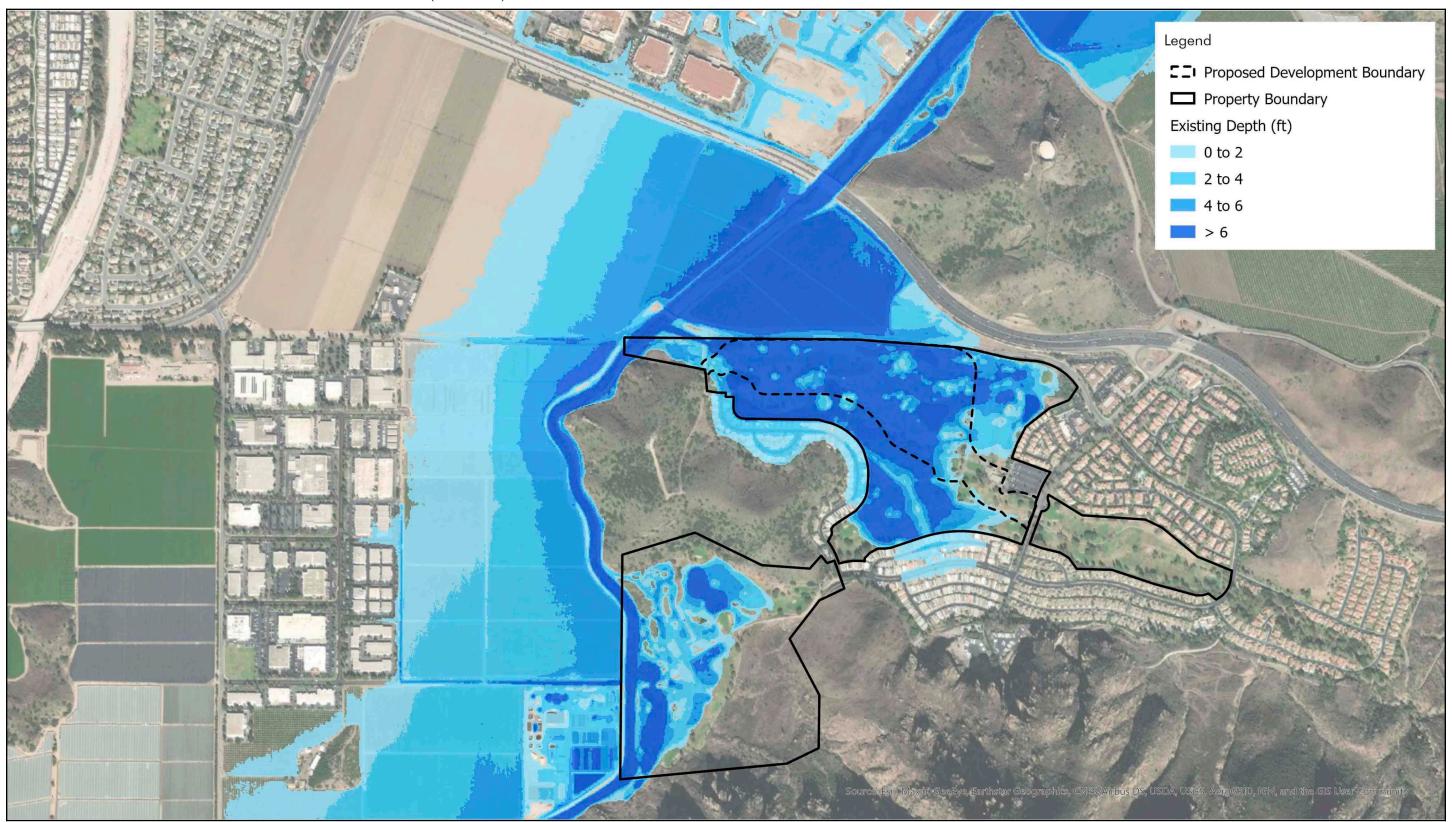


FIGURE 5.9-2 - EXISTING FEMA FLOODPLAIN



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FIGURE 5.9-3 - EXISTING CONDITIONS PEAK FLOW DEPTH (100-YEAR)



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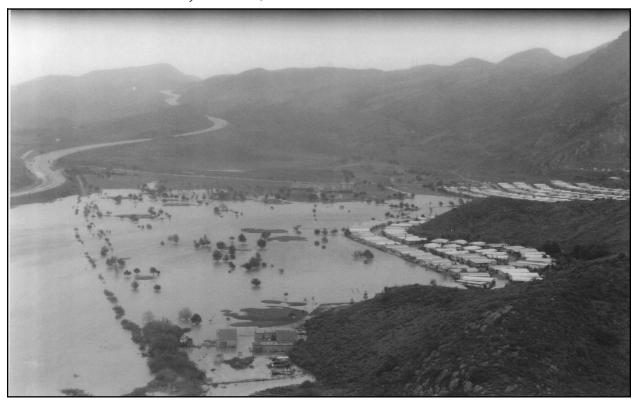


FIGURE 5.9-4 - 1983 CONEJO CREEK/CAMARILLO SPRINGS CREEK FLOODING

In addition, the CWA requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a water body (e.g., wildlife habitat, agricultural supply, fishing), along with the water quality criteria necessary to support those uses. Water quality criteria are prescribed concentrations or levels of constituents—such as lead, suspended sediment, and fecal coliform bacteria—or narrative statements that represent the quality of water that supports a particular use. Because California has not established a complete list of acceptable water quality criteria, the USEPA established numeric criteria for priority toxic pollutants in the form of the California Toxics Rule (CTR) (see 40 Code of Federal Regulations [CFR] 131.38).

FIGURE 5.9-5 - 2014 CAMARILLO SPRINGS MUD AND DEBRIS FLOWS

# California Water Code

The California Water Code is the principal State law regulating water quality in California. The other codes mentioned contain water quality provisions that require compliance. The CWA places the primary responsibly for the control of water pollution and for planning the development and use of water resources with the states, although it does establish certain guidelines for states to follow in developing their programs. California's primary statute governing water quality and water pollution issues is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) (California Water Code, Division 7). The Porter-Cologne Act establishes waste discharge requirements, water quality control planning and monitoring, enforcement of discharge requirements, and ground and surface water quality objectives. It also prevents waste and unreasonable use of water, and it adjudicates water rights. It directs each

Regional Water Quality Control Board (RWQCB) to develop a Water Quality Control Plan (Basin Plan) for all areas within its region. The Basin Plan serves as the basis for each RWQCB's regulatory programs. The City of Camarillo area is located within the purview of the Los Angeles RWQCB (Region 4), and must comply with applicable elements of the region's Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (discussed below), the Porter-Cologne Water Quality Control Act, and the CWA. Following is a discussion of water quality regulations particularly relevant to the proposed project.

# Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (i) identifies beneficial uses for surface and ground waters, (ii) includes the narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan. In combination, beneficial uses and their corresponding water quality objectives are called Water Quality Standards.

Beneficial uses form the cornerstone of water quality protection under the Basin Plan. Twenty-four beneficial uses in the Region are identified in the Basin Plan. The definitions of the beneficial uses applicable to the proposed project are as follows:

**Municipal and Domestic Supply (MUN):** Uses of water for community, military, municipal, or individual water supply systems including, but not limited to, drinking water supply.

**Groundwater Recharge (GWR):** Uses of water for natural or artificial recharge of groundwater for purposes including, but not limited to, future extraction, maintaining water quality, or halting of saltwater intrusion into freshwater aquifers.

**Water Contact Recreation (REC-1):** Uses of water for recreational activities involving bodily contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.

**Non-Contact Water Recreation (REC-2):** Uses of water for recreational activities involving proximity to water, but not normally involving bodily contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

Warm Freshwater Habitat (WARM): Uses of water that support warm water ecosystems including, but not limited to, preservation and enhancement of aquatic habitats, vegetation habitats, and fish and wildlife habitats (including invertebrates).

**Wetland Habitat (WET):** Uses of water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally occurring contaminants.

**Wildlife Habitat (WILD):** Uses of water that support wildlife habitat including, but not limited to, preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife water.

# National Pollutant Discharge Elimination System Municipal Construction General Permit

As authorized by the CWA, the National Pollutant Discharge Elimination System (NPDES) Permit Program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches. Examples of pollutants include, but are not limited to, rock, sand, dirt, and agricultural, industrial, and municipal waste discharged into waters of the United States (see 40 CFR 122.2).

Pursuant to Section 402(p) of the CWA, the State Water Resources Control Board (SWRCB) has issued a statewide general NPDES Permit for storm water discharges from construction sites ([NPDES No. CAS000002] Water Quality Order 2009-0009-DWQ as amended by Orders 2010-0014-DWQ and 2012-0007-DWQ). Under this Construction General Permit, storm water discharges from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by determining the risk level of the construction site and by preparing a Storm Water Pollution Prevention Plan (SWPPP) that includes a site evaluation and assessment, best management practices (BMPs) to be implemented at the construction site, and an inspection program. The SWPPP should also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) according to the Risk Level for the site, as set by the Construction General Permit. The primary objective of the SWPPP is to ensure that the responsible party properly construct, implement, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. Permit Registration Documents (SWPPP, Notice of Intent, and other documents), as well as annual reports, Notice of Terminations, and NAL exceedance reports, must be electronically submitted to the SWRCB and the permit fee mailed to the SWRCB for Construction General Permit coverage.

# Ventura County Municipal Separate Storm Sewer System Permit

The Ventura County Watershed Protection District, County of Ventura, cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura (Ventura), Santa Paula, Simi Valley and Thousand Oaks have joined together to form the Ventura Countywide Storm Water Quality Management Program to discharge wastes. Together, they are parties to the Ventura County Municipal Separate Storm Sewer System Permit (CAS004002, Order R4-2010-0108) approved by the Los Angeles RWQCB.

The objective of CAS004002 is to ensure that discharges from the MS4 in Ventura County comply with water quality standards, including protecting the beneficial uses of receiving waters that are identified on the State Water Resources Control Board's current 303D list of impairments. The current 303D list of impairments for the downstream waterbody (Conejo Creek/Calleguas Creek) to this project include, bacteria, salts, metals, trash, nutrients, pesticides, PCBs and sediment. To meet this objective, CAS004002 requires that BMPs will be implemented to reduce the discharge of pollutants in storm water to the maximum extent practicable and achieve water quality objectives and standards. The implementation of measures set forth in CAS0040028 and CAS004002 are reasonably expected to reduce the discharge of pollutants conveyed in storm water discharges into receiving waters, and to meet the total maximum daily load (TMDL) waste load allocation (WLAs) for discharges from MS4s that have been adopted by the Regional Water Board.

# Camarillo Municipal Code

Chapter 16.34 - Flood Damage Protection of the Camarillo Municipal Code has been adopted to promote public health, safety and general welfare, and to minimize public and private losses due to flood conditions in specific areas of the city. To accomplish its purpose, Chapter 16.34 includes methods and provisions for the following (Section 16.34.120):

- A. Restricting or prohibiting uses which are dangerous to health, safety and property due to water or erosion hazards, or which result in damaging increases in erosion or in flood heights or velocities;
- B. Requiring that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction;
- C. Controlling the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel floodwaters;
- D. Controlling filling, grading, dredging and other development which may increase flood damage; and
- E. Preventing or regulating the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact on hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation onsite or offsite.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.
- Be located in a flood hazard zone and risk the release of pollutants due to project inundation.
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

# PROJECT IMPACTS AND MITIGATION MEASURES

# **Water Quality**

**Threshold**: Would the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Impact**: Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

# Impact Analysis

# **Construction-Related Impacts**

Implementation of the proposed project would involve site preparation and construction of the proposed buildings and associated infrastructure. Since development of the proposed project would include grading of more than one acre, it would require a General Construction Activity Storm Water Permit from the SWRCB prior to the start of construction. The NPDES requires that a Notice of Intent (NOI) be filed with the SWRCB. By filing an NOI, the project developer agrees to the conditions outlined in the Construction General Permit. One of the conditions of the General Permit is the development and the implementation of an SWPPP. The SWPPP identifies which structural and nonstructural BMPs will be implemented, such as sandbag barriers, temporary desilting basins near inlets, gravel driveways, dust controls, employee training, and general good housekeeping practices. With implementation of the applicable grading and building permit requirements and the application of BMPs specifically designed to minimize construction-related water quality impacts, the construction of the proposed project would not violate any water quality standards or waste discharge requirements. Therefore, impacts from construction activities would be less than significant.

# **Operational Impacts**

The proposed project would be subject to the requirements of the Ventura County Municipal Separate Storm Sewer System Permit (CAS004002) and related requirements of the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (TGM) that are in effect at the time of building development.

Compliance with all applicable federal, State, and local regulations, Code requirements, and permit provisions would ensure that the proposed project would not violate any water quality standards or waste discharge requirements and the impact of the project would be less than significant.

The development also includes three bypass culverts to convey storm water flows from the Upper Camarillo Springs Watershed to Conejo Creek. The project also includes two 48-inch-diameter drainage pipes to convey excess storm water from the golf course lake to Conejo Creek. This storm water flow is not subject to water quality treatment standards.

# **Groundwater Supplies**

**Threshold**: Would the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

**Impact**: Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

# **Impact Analysis**

As discussed previously, the groundwater levels at the site are high and there is no applicable place for infiltration. Therefore, the proposed project would not interfere substantially with groundwater recharge.

As discussed in the Utilities and Services Systems section of this EIR, a Water Study has been prepared, and approved by the Camrosa Water District, that demonstrates the projected Camrosa water supply is adequate to meet the domestic water demand of the project. There would be no increased consumption of groundwater for the project's domestic water supply.

The golf course is irrigated by private water from two existing wells located adjacent to Conejo Creek along the westerly edge of the golf course - south area of the project site. Development of the residential area would require a reconfiguration and update of the existing golf course. All existing cart paths, existing ponds, and other golf features (fairways, tees, greens, etc.) would be removed and redesigned as a 12-hole golf course. The reduction of golf course area would reduce the amount of groundwater that is required to irrigate the property.

Therefore, the proposed project would have a less than significant impact on groundwater supplies.

# **Erosion and Siltation**

**Threshold**: Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation onsite or offsite?

**Impact**: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces, and could result in substantial erosion or siltation onsite or offsite.

# Impact Analysis

#### **Construction-Related Impacts**

As discussed previously, the SWPPP required for project construction activities will include structural and nonstructural BMPs for runoff control, sediment control, erosion control, and housekeeping to ensure that construction-related water quality impacts resulting from soil erosion would be reduced to a less than significant level. These BMPs may include, but would not be limited to, perimeter controls such as silt fences and/or sandbag barriers, installation of sediment trapping devises (e.g., straw wattles, hay bales, gravel bags), temporary desilting basins and/or check dams near inlets, fiber rolls, soil stabilization

(e.g., hydroseed, soil binders), protection of steep slopes, covered stockpiles, gravel driveways, dust controls, employee training, and general good housekeeping practices. Required elements of a SWPPP include: (a) site description addressing the elements and characteristics specific to the site; (2) descriptions of BMPs for erosion and sediment controls; (3) BMPs for waste handling and disposal; (4) implementation of approved local plans; (5) proposed post-construction requirements; and (6) non-stormwater management. Routine inspections would be performed of all SWPPP measures and control practices being used at the site, including inspections before and after storm events. In addition, the City's grading and building permit process further ensures that drainage design will meet the City's requirements relating to drainage and erosion control. With implementation of the applicable grading and building permit requirements, and the application of BMPs specifically designed to minimize construction-related water quality impacts, the construction of the proposed project would not cause substantial erosion or siltation onsite or offsite. Therefore, potential erosion and/or siltation impacts related to project construction would be less than significant.

# **Operational Impacts**

Regarding operational impacts, implementation of the proposed project would substantially alter the existing drainage pattern of the site through a change in site grading, the addition of impervious surfaces (as discussed in detail below), and the project's outflow into an existing open channel (Conejo Creek).

According to the Master Drainage Plan, the bypass culverts have been sized and designed to convey the flow from the Upper Camarillo Springs Watershed to Conejo Creek. Precise outlet details and outfall erosion protection have yet to be designed and the Master Drainage Plan states that these would be established during final design, as part of the construction documents.

Creating the building pad for the proposed residences as well as removing the 154 existing residential structures from the mapped 100-year floodplain area would require the excavation and transfer of soils from other areas of the golf course and transferring the soils to the proposed residential area. Most of this would be obtained from the southern golf course area, which would be excavated and lowered to a level that preserves the existing amount of Conejo Creek floodplain storage. Specifically, the project grading and design would increase the amount of floodplain storage in this area by 325 acre-feet. This area has been designed to provide storage for larger flow events, but would be graded to drain passively back to the Conejo Creek channel. The precise grading for the inlet and outlet configuration, which the Master Drainage Plan states would be established during final design, would be designed to allow the storage volume to drain within the time required by the VCWPD. Engineered bank protection, which may be buried, is proposed to provide integrity to the inflow and outflow between the main Conejo Creek channel and the golf course storage area, and protect against erosion.

However, during it's review of the Master Drainage Plan, the City noted that discharges and velocities to the channel west of Margarita Avenue would increase due to the added conveyance caused by the triple box culverts, the Ridge View Street storm drain, and the two 48-inch reconfigured lake/pond drain pipes. A complete energy dissipator and outlet structure design at Margarita Avenue to support a reduction in flow velocities from 9 feet per second (fps) to 3 fps has not been provided in the Master Drainage Plan. Therefore, the City is presently unable to confirm that the project would not cause substantial erosion within Conejo Creek. This is a potentially significant impact.

As a golf course and residential use, the proposed project is not expected to be a generator of siltation. However, the golf course is subject to sediment and debris flows from the Upper Camarillo Springs Watershed. The East Basin has been designed to provide 8.0 acre-feet of debris storage. The proposed design also includes multiple debris basins upstream of the bypass culvert inlet, and a trash rack to stop floating debris from entering the culverts. According to the Master Drainage Plan, the inlet and debris basins have been sized to capture the largest possible volume of debris that could be generated in the Upper Camarillo Springs Watershed. The exact grading and configuration of the basins, and debris deposition profile, have yet to be designed and would be refined at the final design stage to ensure that the basins meet County design standards for debris basins. Therefore, the proposed project's operation is expected to result in less than significant siltation impacts.

Further, any impacts of erosion or siltation on biological resources within jurisdictional areas would be addressed and reduced to a less than significant level through implementation of mitigation measure BIO-12, and the project's sections 401 and 404 permitting under the Clean Water Act, and Section 1602 of the California Fish and Game Code, if applicable. Further, the SWPPP, described above, would include and identify post-construction requirements. Therefore, the proposed project's operation is expected to result in less than significant erosion or siltation impacts.

#### Mitigation

As described above, potentially significant impacts associated with substantial erosion within Conejo Creek may occur. The following mitigation measure is identified to reduce this impact:

HWC-1 The project developer shall submit a complete energy dissipator and outlet structure design at Margarita Avenue that demonstrates a reduction in flow velocities from 9 feet per second (fps) to 3 fps.

#### Mitigation Monitoring

The Public Works Department shall review the project energy dissipator and outlet structure design at Margarita Avenue prior to issuance of grading permits to ensure that it demonstrates a reduction in flow velocities from 9 fps to 3 fps.

# Impact After Mitigation

Mitigation measure HWC-1 would reduce the potential erosion impact of the project to a less than significant level.

# **Flooding**

Threshold: Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?

**Impact**: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite.

#### **Impact Analysis**

The project flood protection system is proposed to consist of elevating the proposed 31-acre residential development area to be a flood protection barrier along the northern boundary of the project site. The project area, as well as the area outside of and immediately south of the project site that includes 154 existing residences (residential structures), is proposed to be protected from the Conejo Creek floodplain. The raising of the residential development site would result in a reduction of about 389 acre-feet of the Conejo Creek floodplain storage. To manage the removed storage volume, an on-site system is proposed that provides flood storage in the lake system located within the main golf course area and both flood and debris storage in the East Basin .

In the proposed conditions, the Camarillo Springs Creek watershed would be divided into the following three primary drainage areas, as shown in Figure 5.9-6, labeled Proposed Condition Drainage Map:

- Watershed A (Upper): the area tributary to the bypass culvert,
- Watershed B (Tributary): the area directly tributary to the lake (South Adjacent Lower Camarillo Springs Creek Watershed and South Project Development),
- Watershed C (North): the area that drains to the north/east of the lake and proposed residential project (East Adjacent Lower Camarillo Springs Creek Watershed and East Project Development).

The proposed Master Drainage Plan is illustrated in Figure 5.9-7 and described as follows. Peak flow rates and volumes for the drainage areas are also noted in Figure 5.9-7.

As shown in Figure 5.9-7, the East Basin would be located east of Camarillo Springs Road and would collect storm water and sediment from the 842-acre Upper Camarillo Springs Watershed (Watershed A). This basin would have a footprint of 3.1 acres and provide the capacity for 18 acre-feet of storm water storage (including 8.0 acre-feet of sediment and debris storage).

Excess storm water from the East Basin would then flow through the existing golf cart tunnel and proposed culverts located beneath Camarillo Springs Road and into the West Basin located to the west of Camarillo Springs Road. The westerly and southerly bank of the West Basin would have a breach resistant soil core design intended to prevent the basin from failing and allowing flows into the golf course lake. Instead of diverting the flows from the Upper Camarillo Springs Watershed into the golf course lake, the West Basin would divert the flows into three bypass culverts which would convey the flows to Conejo Creek. The main bypass culvert would travel under the proposed residential area and along Ridge View Street to an outlet at Margarita Avenue. A secondary double culvert would travel along the northern edge of the lake to the same outlet at Margarita Avenue. For storms greater than 100-year, a secondary overflow spillway from the West Basin would be utilized to direct higher flows north toward the driving range. The secondary overflow spillway would also be used in the case of a blockage occurring in the bypass culverts.

The golf course lake would capture the storm event flows from the adjacent hillsides and existing residences to the south, and the runoff from the southerly half of the new proposed development (Watershed B), but not from the main Upper Camarillo Springs Watershed. The lake would have a normal operating surface water elevation of up to 108 feet. The lake area would have a footprint of 19 acres and provide a surcharge capacity of 56 acre-feet of storm water storage between the normal elevation and the designed maximum flood elevation of 112 feet. Once the storm has passed through, the overflow would drain from the lake out to Conejo Creek through a 48-inch-diameter drainage pipe. A second 48-inchdiameter drainage pipe is proposed for redundancy. This second pipe could function as an emergency spillway in the event of a blockage of the main 48-inch drainage pipe. Each pipe would have a tide flex flap gate to prevent larger debris from getting trapped. Both 48-inch-diameter drainage pipes would also have manually activated gate valves. With this additional safety feature, if debris should be trapped, Conejo Creek floodwaters could be isolated from the lake by closing the gate valves. The valves are intended to only be used in an emergency condition. Once the flood level in Conejo Creek has receded, the gate valves could be opened and the lake would drain by gravity down to the non-storm water surface elevation (108 feet or below). At that point, what was blocking the overflow pipe and flap gate from sealing completely could be seen and removed. The proposed main lake drain pipe and emergency spillway configuration is illustrated in Figure 5.9-8.

FIGURE 5.9-6 - PROPOSED CONDITIONS DRAINAGE MAP

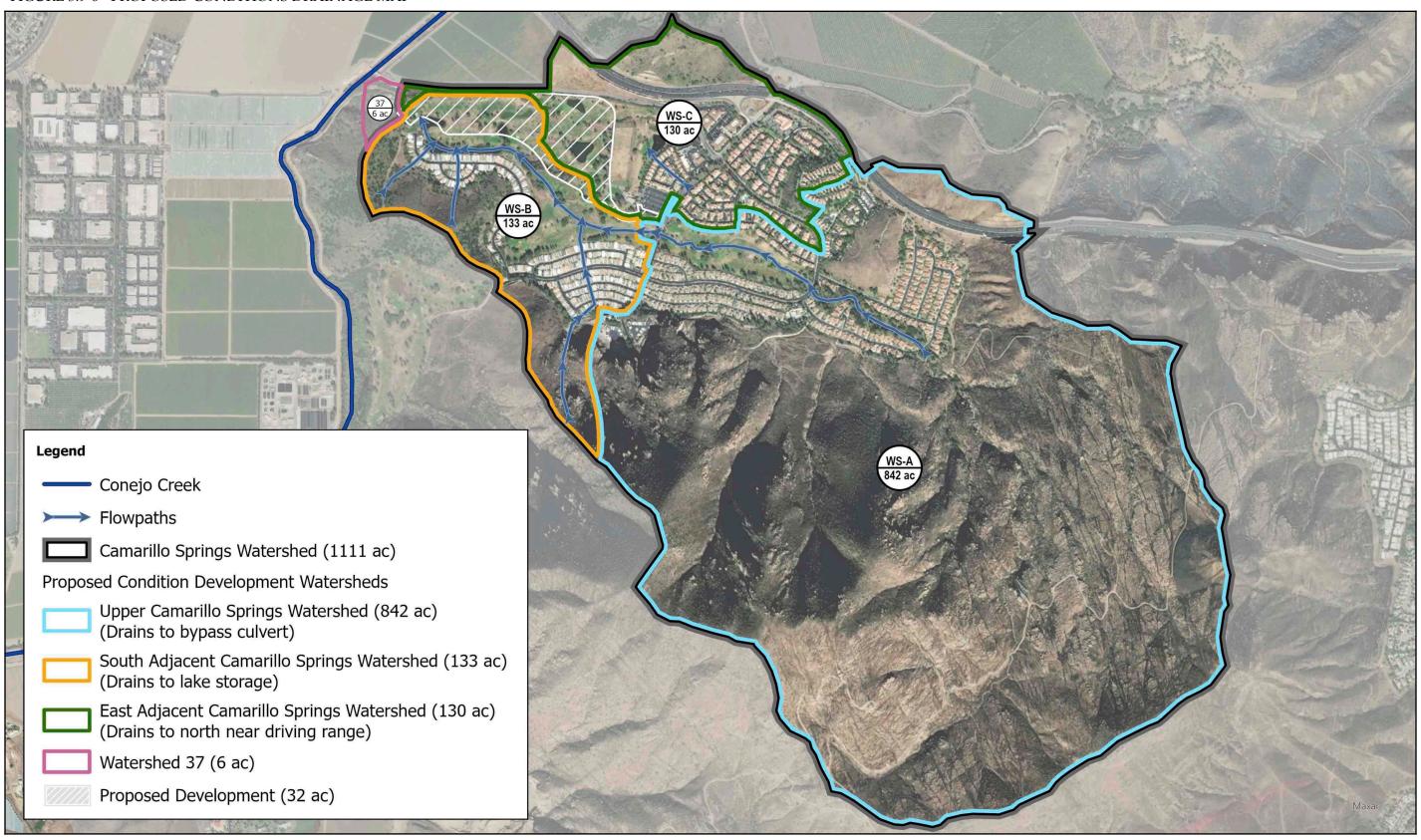
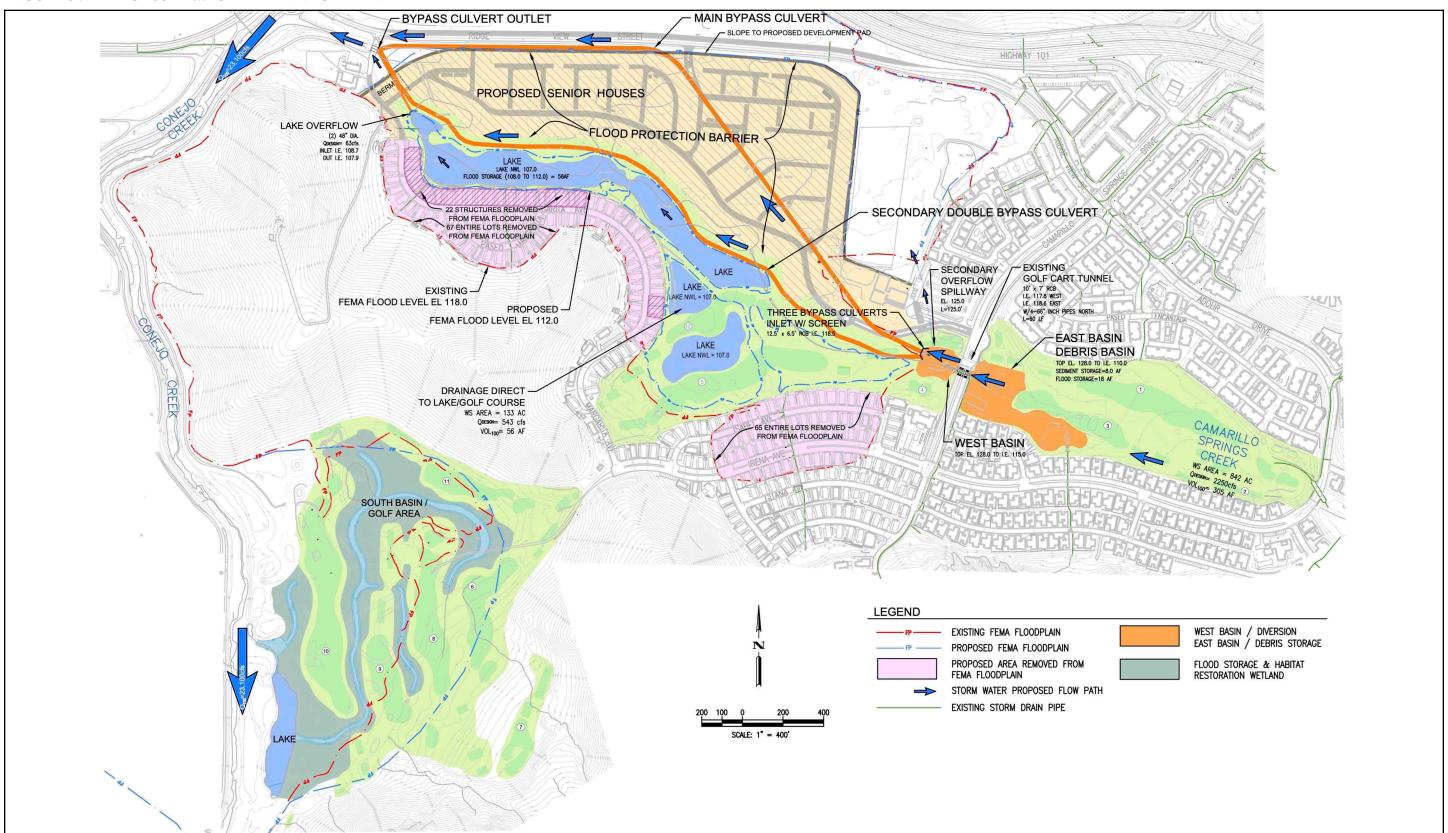


FIGURE 5.9-7 - PROPOSED MASTER DRAINAGE PLAN



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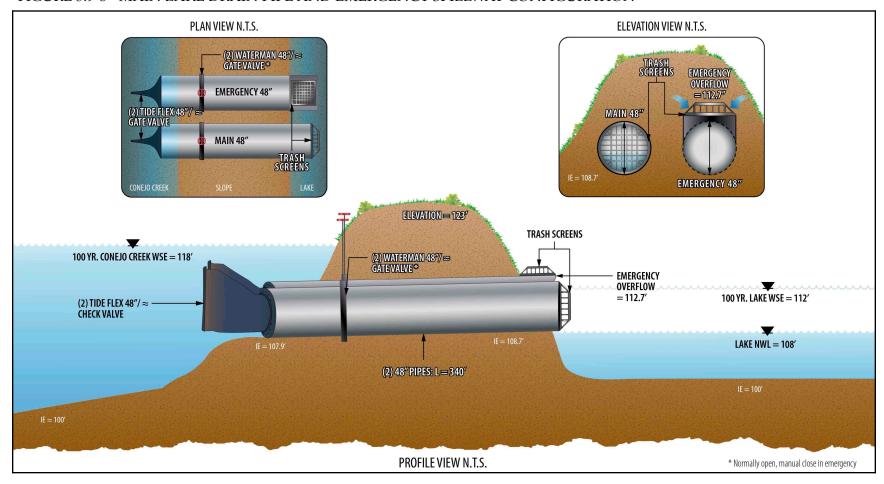


FIGURE 5.9-8 - MAIN LAKE DRAIN PIPE AND EMERGENCY SPILLWAY CONFIGURATION

According to the Master Drainage Plan and Floodplain Analysis, there are no elements of the proposed drainage plan that require active operational activity by anyone or anything (pumps, valves, actuators, level controls, etc.). The proposed drainage system is considered "passive" and includes multiple redundant safety features as part of the design effort. Operation and maintenance personnel are not required to perform any action for the system to function as designed during a flood event, unless the system is not functioning during a storm. Maintenance (as is required on every drainage facility) would happen before and after the annual rainy season.

The project applicant has proposed that the maintenance responsibility of the proposed drainage system ( East Basin, West Basin, bypass culvert inlets, outlet and length of the culverts, and two 48-inch-diameter lake drainage pipes (with flap gates and valves)) would be paid for as an annual assessment to the proposed new property owners and be the financial and management responsibility of the new property owners and not the City or the existing residents. The maintenance entity would be the homeowners association (HOA).

Because the project site is located within a flood hazard area and the project would include privately-owned flood protection measures, Camarillo Municipal Code Section 16.34.330 requires that an operation or maintenance plan be prepared and submitted by the owner and be on file with the City of Camarillo. The project applicant has prepared a preliminary drainage system Maintenance Manual for use in evaluating the fiscal impacts of the project. The preliminary drainage system Maintenance Manual is provided as Appendix S to this EIR. The drainage system maintenance plan and easements would be finalized with completion of the final design and drainage improvement plans.

Creating the building pad for the proposed residences as well as removing the 154 existing residential structures from the mapped 100-year floodplain area would require the excavation and transfer of soils from other areas of the golf course and transferring the soils to the proposed residential area. Most of this would be obtained from the southern golf course area, which would be excavated and lowered to a level that preserves the existing amount of Conejo Creek floodplain storage. Specifically, the project grading and design would increase the amount of floodplain storage in the southern golf course area by 325 acrefeet. This area is designed to provide storage for larger flow events, but would be graded to drain passively back to the Conejo Creek channel. The precise grading for the inlet and outlet configuration, which would be established during final design, must demonstrate that the storage volume would drain within the time required by the Ventura County Watershed Protection District. Engineered bank protection, which may be buried, is proposed to provide integrity to the inflow and outflow between the main Conejo Creek channel, and the golf course storage area and protect against erosion. A drainage easement is proposed to be dedicated to the VCWPD over the storage and conveyance areas to ensure that the storage volume is maintained. Maintenance activities on the storage area would be under the jurisdiction of the VCWPD.

#### Camarillo Springs Creek Hydraulic Analysis

The proposed project is designed to create flood protection for the 154 existing residences and new development. A design performance requirement is that the proposed design must preserve the amount of existing Conejo Creek floodplain storage. The proposed project will occupy overbank area where there is approximately 389 acre-feet of existing Conejo Creek 100-year floodplain storage as illustrated in Figure 5.9-9. The proposed project provides compensatory storage consisting of approximately 70 acre-feet of storage in the interior lake and East Basin (not counting the storage available for sediment volume), and increases the floodplain storage on the south golf course area by 325 acre-feet as illustrated in Figure 5.9-10.

Figure 5.9-10 shows that the 154 existing residences (residential structures) could be removed from the 100-year floodplain. A total of 132 mobile home lots could be completely removed from the 100-year flood hazard zone. However, because some existing mobile home lots have elevations as low as 110 feet, a portion of 22 lots located along Margarita Avenue would remain partially within the 100-year flood zone. Specifically, the 154 mobile home lots within the FEMA 100-year floodplain could be affected as follows:

- There are 89 lots and residential structures in the west area generally adjacent to Margarita Avenue: 67 lots and residential structures could be completely removed from FEMA 100-year flood hazard, 22 lots immediately adjacent to the existing lake have existing ground below elevation 112.0 and, therefore, a portion of the lots would remain in the FEMA 100-year floodplain. Although all 22 lots could have the residential structure removed from the 100-year floodplain, mortgage companies may require flood insurance for these properties.
- There are 65 lots and residential structures in the south area generally adjacent to Irena Avenue: all 65 residential structures and the entire lots could be removed from the FEMA 100-year floodplain.

#### Conejo Creek Hydraulic Analysis

## Flow Depth Impacts

The existing peak flood flow depths were shown previously in Figure 5.9-3 while the proposed flood flow depths are illustrated in Figure 5.9-11. These flow depth exhibits show the greatest extents of the surface water during the design storm. As can be seen by comparing the flood depth exhibits for the existing and proposed conditions, the peak flow depths do not change substantially outside of the project site boundary on the properties upstream or downstream of the golf course property, or on the properties west of the golf course property. Any changes to the floodplain extents are not detectable at the FEMA map scale.

Comparing the existing and proposed conditions flow depth exhibits, changes to the flow depths and extents can be seen within the project site. The changes within the north golf course area reflect onsite project grading and fill, and also the onsite floodplain storage of flow generated on the local watershed.

The exhibits also show the removal of the 100-year floodplain from within the main residential project area and 154 existing mobile homes along the southern edge of the golf course. The comparison also shows the increase in overbank floodplain storage depth on the south golf course area.

The 100-year flow depth differential exhibit, Figure 5.9-12, shows the flood depth changes, calculated as the proposed conditions depth minus existing conditions depth. The figure shows the substantial depth increases, by design, on the project property on the south golf course area. Only very slight increases in the modeled flow depth occur anywhere in the Conejo Creek channel or on adjacent overbank areas through the entire study reach. Absolute flow depth increases of less than 0.1 foot, are shown in the Conejo Creek Channel and on offsite overbank areas throughout the entire project study area. There are several observations that indicate that these are not substantial impacts.

- These slight differences from the models are on the same order of magnitude as the hydraulic model convergence tolerance, and so are at the low limit of the model ability to reliably calculate.
- The small differences are calculated using a hypothetical large storm event that is very rare.
- The differences are not sustained, and would only occur during a short time.
- In actual field conditions, these changes are not measurable in elevation.
- These changes also do not cause any change to mapped floodplain extents.

These slight depth changes are essentially calculated artifacts but are not changes that would be visible or measurable. These changes would not create significant impacts to the Conejo Creek floodplain or to surrounding properties.

## Flow Velocity Impacts

The existing and proposed conditions flow velocity exhibits, Figure 5.9-13 and Figure 5.9-14, depict the grid averaged velocity field in Conejo Creek at the peak of the hydrographs. Comparison of the flow velocity exhibits for the existing and proposed conditions reveal that there are minor changes to the velocity outside of the project property, with some larger velocity changes within the project property on the south golf course storage area. The exhibits also show the north part of the project area, including more than 150 existing homes, with no velocity in proposed conditions.

The flow velocity differential, Figure 5.9-15, shows the flow field localized velocity changes, calculated as the proposed conditions flow velocity minus the existing conditions velocity. The figure shows that there are minor increases to the velocity offsite areas. Absolute velocity increases are less than 0.5 feet/second everywhere, except for a few isolated spots. Most of the area shows no increase in velocity.

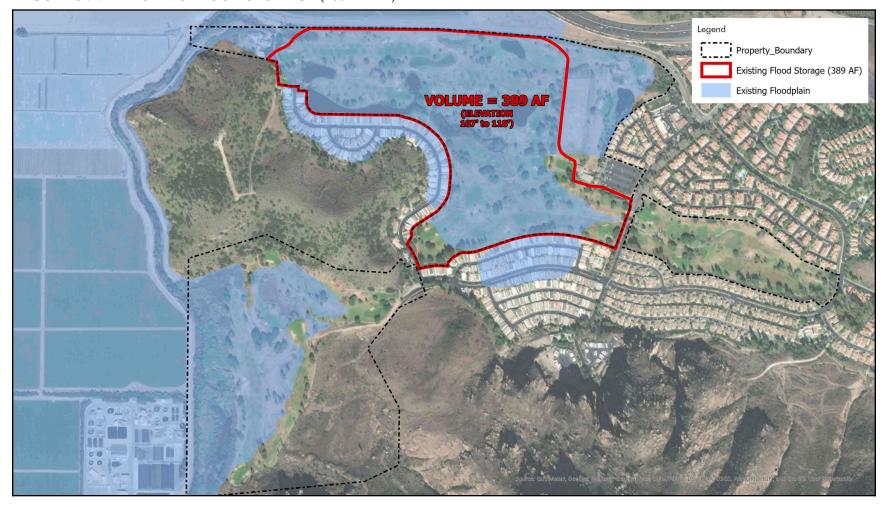
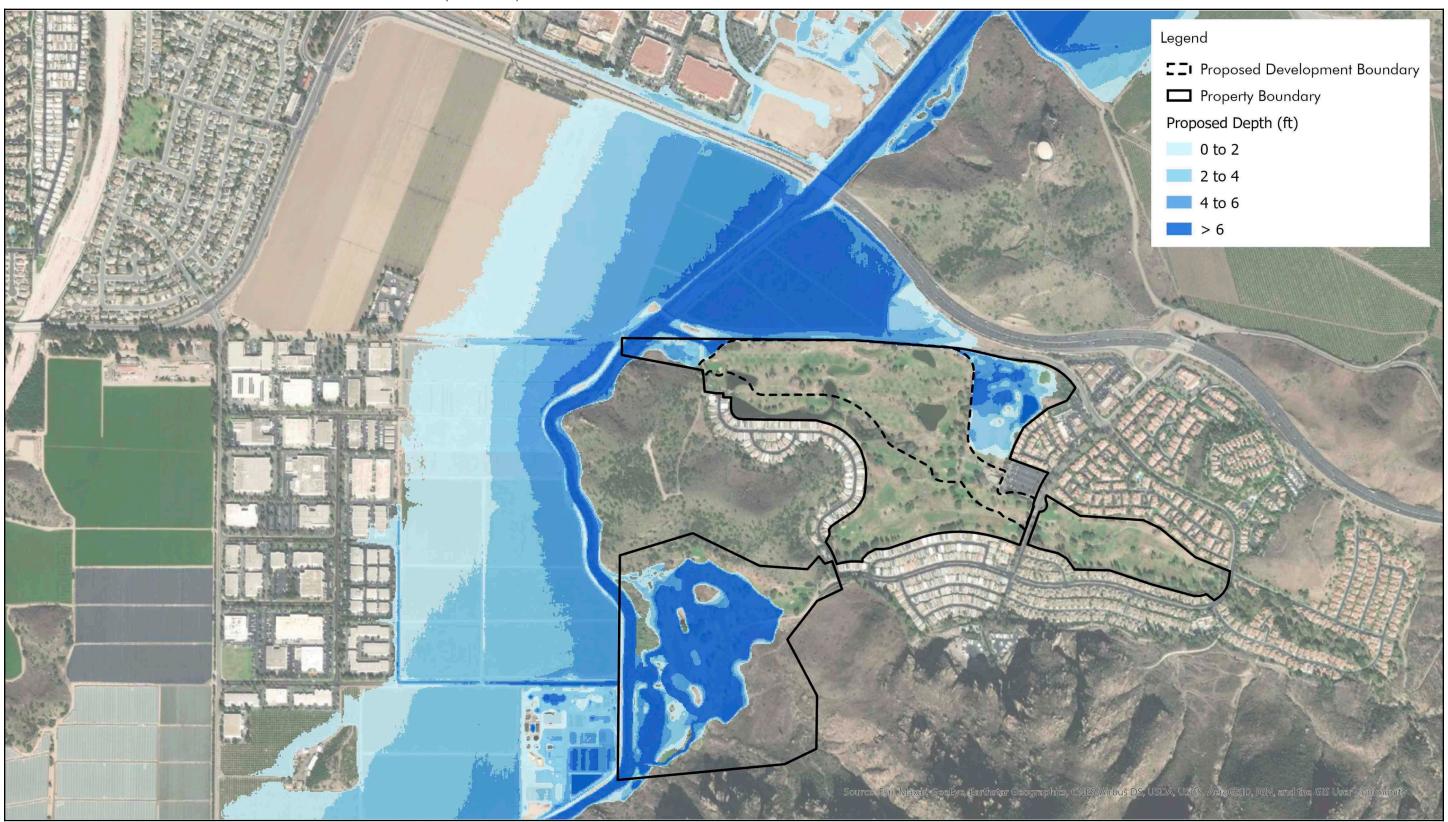


FIGURE 5.9-9 - EXISTING FLOOD STORAGE (100-YEAR)

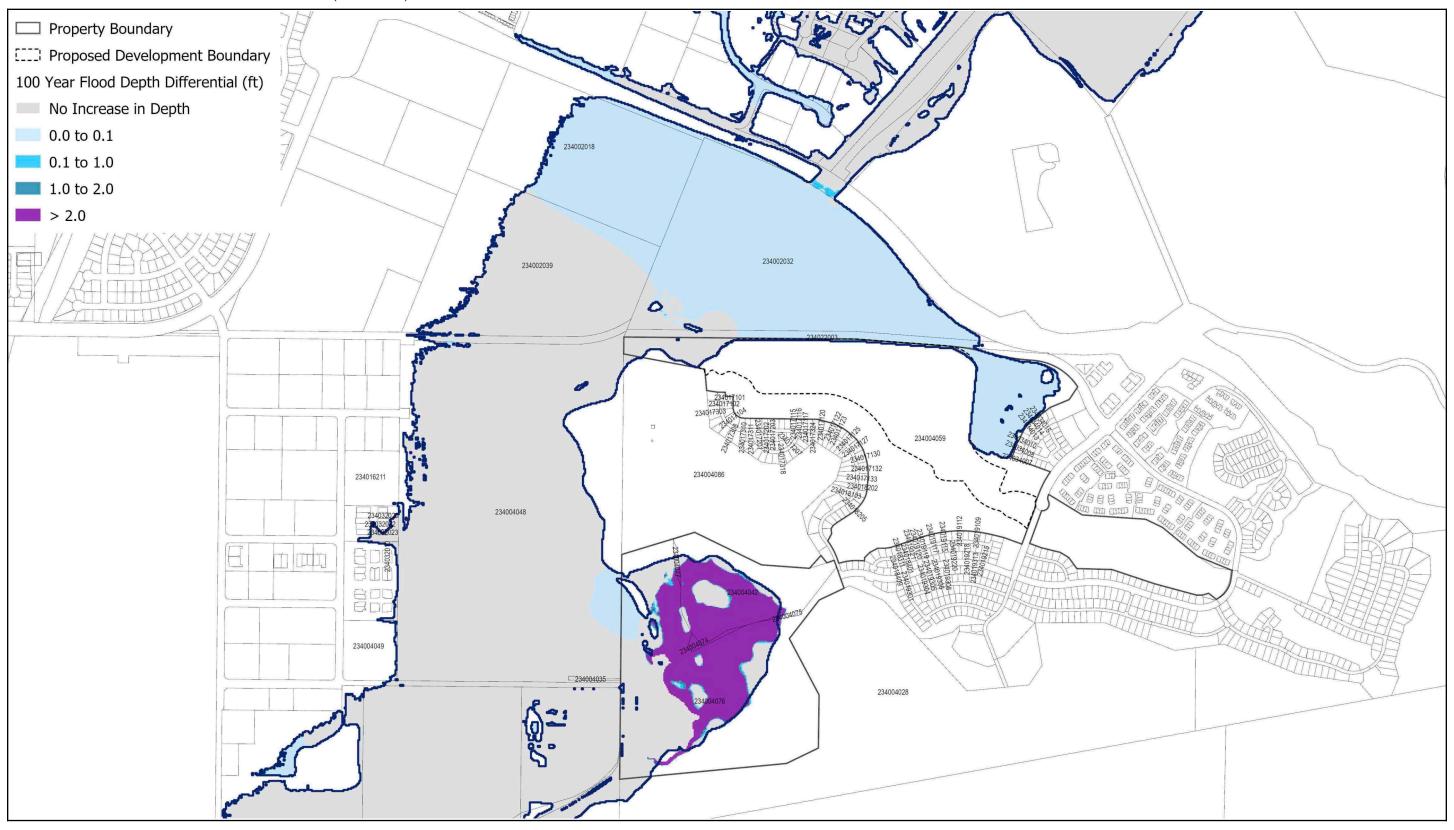
Legend **C::** Property Boundary Project Boundary Proposed Flood Storage Proposed Floodplain

FIGURE 5.9-10 - PROPOSED FLOOD STORAGE (100-YEAR)

FIGURE 5.9-11 - PROPOSED CONDITIONS PEAK FLOW DEPTH (100-YEAR)



# FIGURE 5.9-12 - FLOW DEPTH DIFFERENTIAL (100-YEAR)

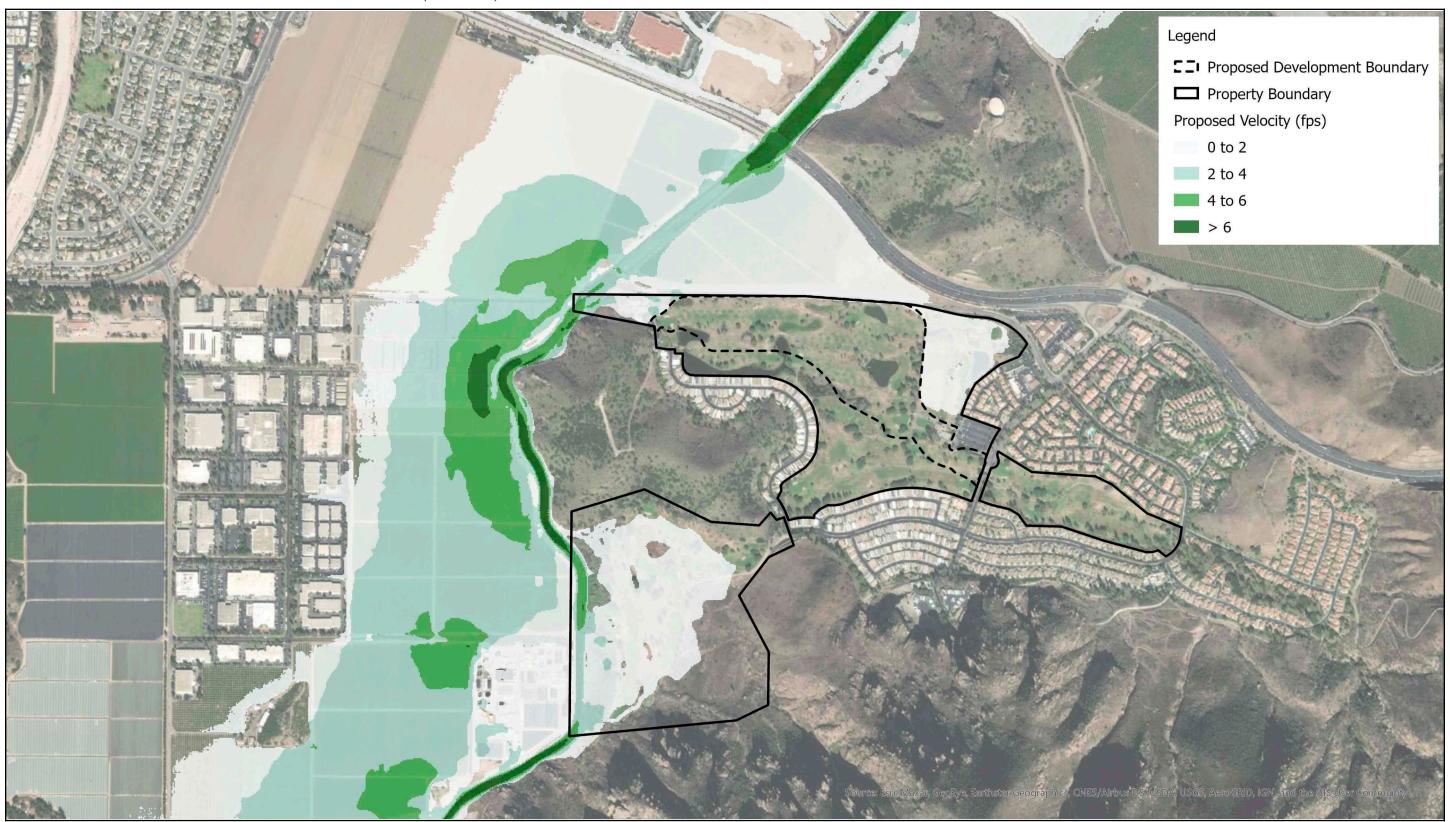


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FIGURE 5.9-13 - EXISTING CONDITIONS PEAK VELOCITY (100-YEAR)

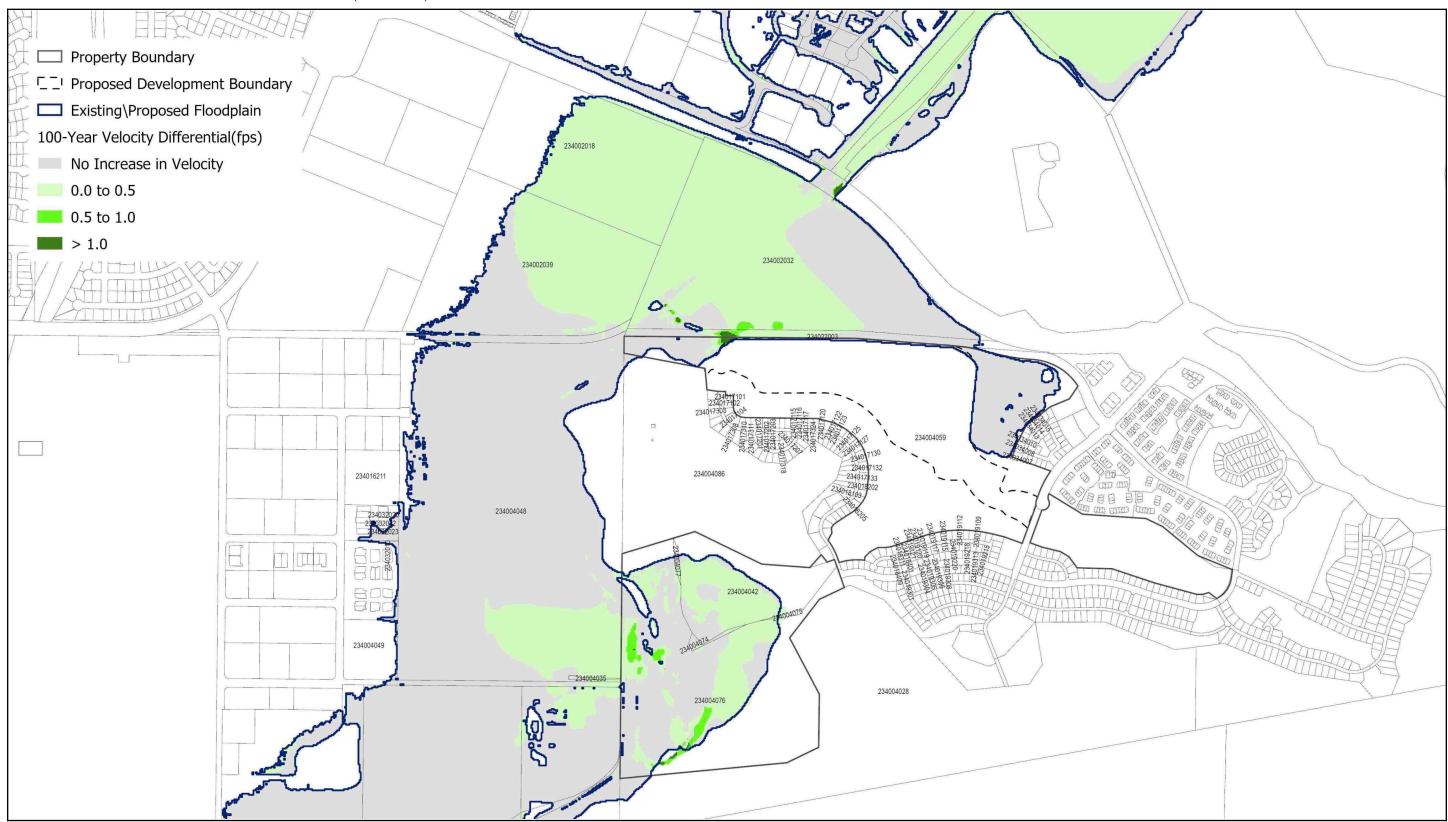


FIGURE 5.9-14 - PROPOSED CONDITIONS PEAK VELOCITY (100-YEAR)



5.9-32 Camarillo Springs GPA 2017-2

FIGURE 5.9-15 - PEAK VELOCITY DIFFERENTIAL (100-YEAR)



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The impacts of any calculated changes in velocity are examined by considering if the flow could cause erosion. The National Engineering Handbook recommends allowable sustained velocity design values of 2 feet/second to 10 feet/second. For the study reach, a peak velocity of 4 feet/second was used, as recommended by the County of Ventura. This value is used to calculate possible velocity impacts, as shown in the flow velocity differential exhibit in Figure 5.9-16. The impacts value is chosen as the condition where the velocity in existing conditions is below 4 feet/second but the velocity in proposed conditions is above 4 feet/second. It can be seen from Figure 5.9-16 that the project would not impact offsite areas by creating new areas of erosive conditions.

There are only a few scattered cells that are shown with the impacts condition but they are all surrounded by large areas of no color. Isolated spots indicate localized, transient model peaks. Such areas do not indicate velocity differences that could be expected and measured in field conditions.

#### **Additional Event Analysis**

In an effort to thoroughly examine the function of the proposed drainage system, a series of additional events were analyzed. The additional events are hypothetical situations to test the extreme limits of the drainage system performance. These are reasonable to consider based on historical events as previously discussed. The additional events are greater than County or Federal design events, and result in conditions that are far more taxing on the proposed drainage system than County or Federal design events. The intent is to explore the performance of the drainage system beyond that required by County or Federal design. Table 5.9-1 lists the analyzed additional events.

TABLE 5.9-1: ADDITIONAL EVENT ANALYSIS LIST	
#	Scenario
1	Proposed System with Four-Day Storm
2	Proposed System with Blockage of Pipes at Camarillo Springs Road
3	Proposed System with Blockage of Three Bypass Culverts
4	Proposed System with Blockage of North RCP Drain
5	Proposed System with Blockage of Lake Drainage Pipe
ource	of table data: Pacific Advanced Civil Engineering, Inc., April 2022.

• For Scenario 1, the Ventura County Hydrology Manual describes how a four-day storm can be developed from the 100-year Storm Data. A four-day storm was calculated and modeled for each of the sub-watersheds. The results in the Master Drainage Plan of the model indicate the proposed drainage system would be able to accommodate the four-day storm, which is essentially three smaller storms before a full 100-year storm arrives on the fourth day. The lake elevation in this scenario would reach a maximum elevation of 113.1 feet. This elevation is less than the current existing conditions flood elevation of 118 feet.

- Scenario 2 takes the full proposed drainage system and assumes the four proposed 66-inch pipes and existing golf cart tunnel are all blocked at Camarillo Springs Road. The same scenario was also run in the existing condition with the existing golf cart tunnel blocked at Camarillo Springs Road. The results in the Master Drainage Plan show the lake in the proposed conditions would reach an elevation of 112.8 feet. This elevation is less than the current existing conditions flood elevation of 118 feet.
- Scenario 3 takes the full proposed drainage system and blocks the three proposed bypass culverts. The results of this scenario were compared to existing conditions. The lake in the proposed conditions would reach an elevation of 112.6 feet. This elevation is less than the current existing conditions flood elevation of 118 feet.
- Scenario 4 takes the full proposed drainage system and blocks the drainage pipe running along the north edge of the property. The results of Scenario 4 were compared to existing conditions. The lake in the proposed conditions would reach an elevation of 112.0 feet. This elevation is less than the current existing conditions flood elevation of 118 feet.
- Scenario 5 takes the full proposed drainage system and blocks the lake drainage pipe. The results of Scenario 5 were compared to existing conditions and are shown in Figures J and P of Appendix F to the Master Drainage Plan. The lake in the proposed conditions reaches an elevation of 112.0 feet. This elevation is less than the current existing conditions flood elevation of 118 feet.

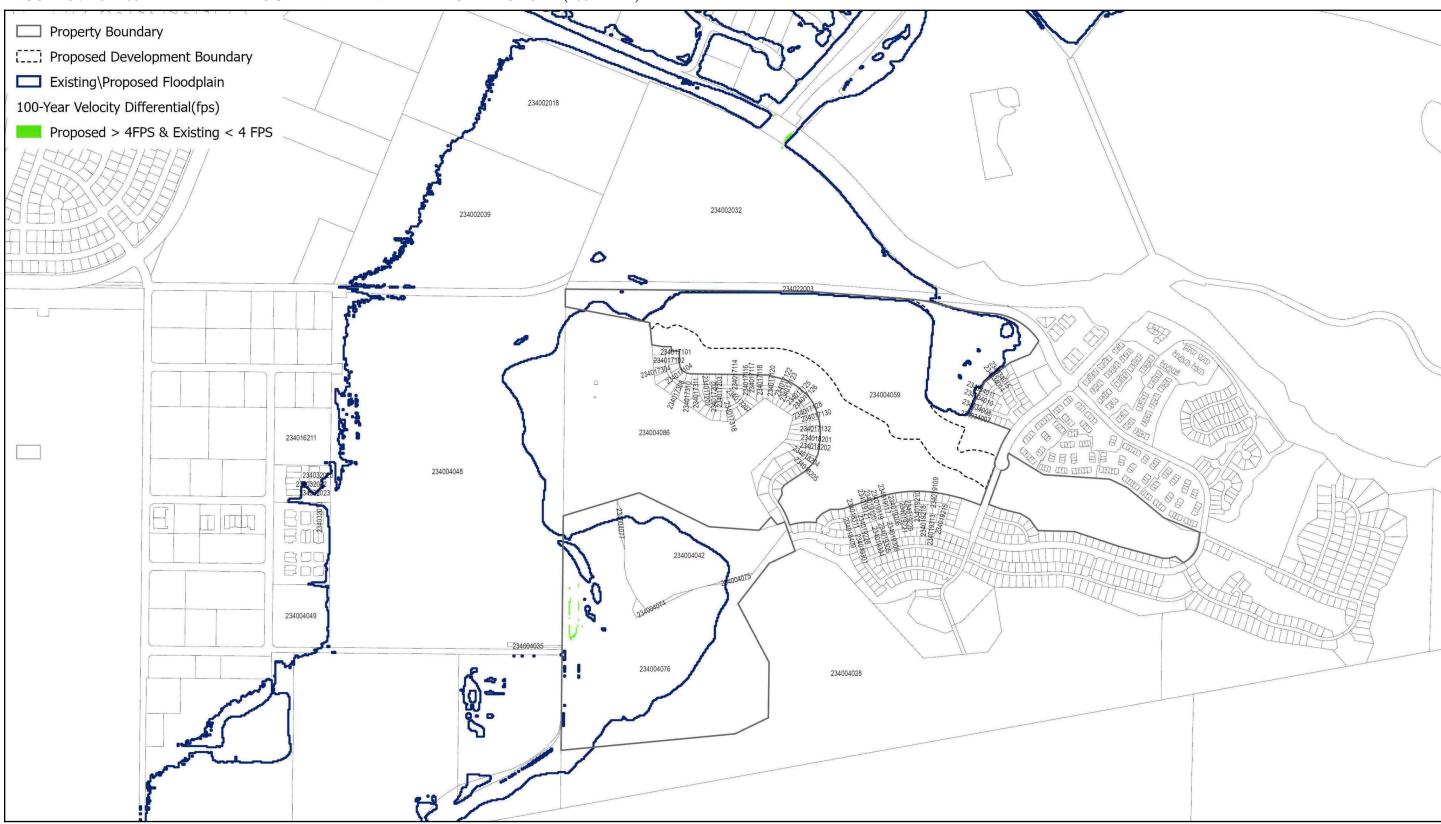
The analysis in the Master Drainage Plan shows that even in the additional event conditions, the proposed drainage system could provide improved community flood protection compared to the existing conditions. Doing so, however, relies on the proposed mechanical flood protection devices that require intensive maintenance in perpetuity.

#### **Project Design Considerations**

The proposed project includes an artificial lake fill embankment with new homes on top which would be higher than the existing houses adjacent to the lake. This is not a standard design for projects in Camarillo where unobstructed emergency overflow spillways are constructed lower than the adjacent home pad elevations and higher than the downstream flood elevations. Therefore, there are some inherent risks associated with the proposed drainage design concept.

The artificial fill embankment would double as a dam embankment and a levee embankment, yet the Master Drainage Plan does not state if it would be designed and engineered as such. A "lake" area would be formed behind the proposed fill embankment located perpendicular to the current Camarillo Springs Creek center line through the golf course. At the same time, a levee embankment would be created parallel to the Conejo Creek center line with homes behind it.

FIGURE 5.9-16 - 100-YEAR PEAK VELOCITY DIFFERENTIAL - 4 FPS THRESHOLD (100-YEAR)



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The National Flood Insurance Program (NFIP) defines a levee in Title 44, Chapter 1, Section 59.1 of the Code of Federal Regulations (44 CFR 59.1) as "a man-made structure, usually an earthen embankment, designed and constructed in accordance with sound engineering practices to contain, control, or divert the flow of water so as to reduce risk from temporary flooding." Within the NFIP, a levee is a manmade structure, usually an earthen embankment, designed and constructed in accordance with sound engineering practices to contain, control, or divert the flow of water so as to provide protection from temporary flooding. Therefore, as part of the required revised CLOMR to FEMA, the fill embankment should be included as a levee meeting NFIP regulations since it is being used to remove existing homes from the FEMA 100-year floodplain. NFIP design criteria for a levee include the following:

- Freeboard. The minimum freeboard required is 3 feet above the Base Flood Elevation (BFE) all along the length of the levee, with an additional 1 foot within 100 feet of structures (such as bridges) of wherever flow is restricted, and an additional 0.5 foot at the upstream end of a levee. Levees impacted by coastal flooding have special freeboard requirements.
- Closures. All openings must be provided with closure devices that are structural parts of the system during operation and designed according to sound engineering practice.
- Embankment Protection. Engineering analyses must be submitted that demonstrate that no appreciable erosion of the levee embankment can be expected during the base flood, as a result of either currents or waves, and that anticipated erosion will not result in failure of the levee embankment or foundation directly or indirectly through reduction of seepage path and subsequent instability.
- Embankment and Foundation Stability Awareness. Engineering analyses that evaluate levee embankment stability must be submitted. The analyses provided must evaluate expected seepage during loading conditions associated with the base flood and must demonstrate that seepage into or through the levee foundation and embankment will not jeopardize embankment or foundation stability. An alternative analysis demonstrating that the levee is designed and constructed for stability against loading conditions for Case IV as defined in the U.S. Army Corps of Engineers (USACE) Engineer Manual 1110–2–1913, Design and Construction of Levees, (Chapter 6, Section II), may be used.
- Settlement Analysis. Engineering analyses must be submitted that assess the potential and magnitude of future losses of freeboard as a result of levee settlement and demonstrate that freeboard will be maintained. This analysis must address embankment loads, compressibility of embankment soils, compressibility of foundation soils, age of the levee system, and construction compaction methods. In addition, detailed settlement analysis using procedures such as those described in USACE Engineer Manual 1110–1–1904, Soil Mechanics Design— Settlement Analysis, must be submitted.
- Interior Drainage. An analysis must be submitted that identifies the source(s) of such flooding, the extent of the flooded area, and, if the average depth is greater than 1 foot, the water-surface elevation(s) of the base flood. This analysis must be based on the joint probability of interior and exterior flooding

and the capacity of facilities (such as drainage lines and pumps) for evacuating interior floodwaters, as described in USACE Engineer Manual 1110-2-1914, Hydrologic Analysis of Interior Areas.

Because of its location and the proximity to Conejo Creek, the fill embankment creates a "levee condition" with an elevation of at least 123 feet along Conejo Creek as there are many existing homes adjacent to the lake, which are several feet below the existing 100-year Base Flood Elevation (BFE) of Conejo Creek (118 feet). This is in potential conflict with Camarillo Municipal Code Section 16.34.120(E) for preventing or regulating the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

While each project has a unique drainage system, other development projects in the City have historically included an unobstructed emergency overflow spillway constructed lower than the adjacent home pad elevations and higher than the downstream flood elevations in the receiving streams allowing stormwater to escape before it reaches the elevation of any homes in compliance with the Camarillo Municipal Code. Emergency overflow spillways are typically designed to handle the unreduced incoming 100-year flood peak flows without the use of mechanical backflow prevention devices. The following developments in Camarillo include drainage basins that have unobstructed emergency overflow spillways in one form or other serving the same purpose of protecting the building pads from flooding and providing a pathway for stormwater to escape from the basin downstream without causing flooding in the event that the drain pipe system becomes plugged or overwhelmed:

- Pitts Ranch
- Village at the Park
- Vina del Mar (at the base of Spanish Hills)
- Camarillo Town Center (Target), Camarillo Town Center West (Home Depot), and adjacent properties south of Ventura Boulevard drain to basins with emergency overflows to the Camarillo Hills Drain
- Residential development around Quito Park has a basin/overflow at the end of Camino Las Ramblas

Due to the substantial flood level differential between Conejo Creek and the area adjacent to the proposed lake, the project as proposed would be unable to provide an unobstructed emergency overflow spillway to allow stormwater to escape from the lake under any rainfall conditions before it reaches the elevation of any existing and proposed homes, and guaranteeing that the proposed development would not increase flooding hazards.

Instead of providing an unobstructed emergency spillway as prescribed above, the project is proposed to provide a redundant 4-foot-diameter overflow pipe from the lake with a weir opening on top set at the 112.7-foot 100-year flood elevation of the lake. This proposed overflow pipe and weir is not designed for the unreduced incoming 100-year flood peak flow. The other main 4-foot-diameter operating outlet pipe

and this redundant overflow pipe both require mechanical backflow prevention devices at their outlets such as flap gates to prevent flood water from backflowing from Conejo Creek into the lake. Manually operated gate valves are proposed as a backup prevention measure in the event the mechanical flap gates fail. These mechanical devices and the drainage pipes and culverts would require implementation of a maintenance plan in perpetuity to ensure their proper operation to prevent flooding. The proposed drainage plan does not provide a passive system such as an unobstructed emergency overflow spillway to guarantee that the proposed development would not increase flooding hazards.

In addition, the second 48-inch-diameter drainage pipe from the lake to Conejo Creek that is proposed to function as an emergency spillway in the event of a blockage of the main 48-inch drainage pipe is not a typical emergency spillway design. The proposed 'redundant' pipe would not convey the full unattenuated flow. The inlet to the pipe was modified to only flow out of the lake when it is above the 100-year water level.

Meeting the City's requirements as previously described is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and proposed development.

#### **City Review Considerations**

As part of the review process for the proposed project, the City hired Kasraie Consulting to conduct a third party review of the project Master Drainage Plan and Floodplain Analysis. Most of these issues identified during the third party review are in the current Master Drainage Plan and Floodplain Analysis for the project. However, the following issues that were identified during the review have not been resolved:

- Hydrology
  - The impervious value for subarea WS35 of the modeling analysis was not revised in the current Master Drainage Plan and Floodplain Analysis.
- Unobstructed Emergency Spillway
  - An unobstructed emergency spillway and flow path were not provided as required by the City.
  - A redundant 48" RCP outlet pipe and weir structure are proposed in addition to the single lake 48" RCP operating outlet pipe. Preventing backflow from Conejo Creek through the lake outlet is dependent on a mechanical system, such as the proposed mechanical Tideflex Duckbill Check Valves (TDCV) on the outlets of both 48-inch RCP pipes and the additional manual gate valve on each 48-inch RCP. An operations and maintenance plan is necessary for the proposed mechanical system.

#### • Separation Floodwall-Levee Embankment

• The embankment or floodwall between the West Basin and the lake is proposed to separate the upstream Camarillo Springs Creek flows and the local flows adjacent to the lake. A full design of the embankment or floodwall, including soils or geotechnical engineering analysis, was not provided in the current Master Drainage Plan and Floodplain Analysis. The project applicant has indicated that this information will be provided at the time of final design. Therefore, the separation cannot be verified by the City at this time.

#### • Additional Information or Data

• A breach analysis was not provided in the current Master Drainage Plan and Floodplain Analysis for the embankment between the lake and the West Basin. The project applicant has indicated that they will consult with a geotechnical engineer to ensure the separation floodwall and levee embankment will be designed to prevent breaching. Therefore, breach resistance cannot be verified by the City at this time.

#### Summary

In summary, the proposed project development would be protected from the FEMA 100-year floodplain and 154 existing residences could be removed from the current 100-year FEMA floodplain. The analysis also shows that the proposed project would preserve the amount of existing Conejo Creek floodplain volume. However, the proposed drainage plan does not meet the City's requirements of an unobstructed emergency overflow spillway as previously described. Meeting the City's requirements is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and the proposed development. In addition, several issues identified during the City's third party review of the Master Drainage Plan and Floodplain Analysis for the project have not been resolved and, as a result, the proposed project is unable to guarantee that there would be no increase in flooding hazards. Therefore, the impact of the project on flooding onsite or offsite would be significant and unavoidable.

While preliminary flood mitigation analysis and review has been conducted by the VCWPD and FEMA, the final flood mitigation plans and revision of the FEMA flood hazard map are subject to the review and approval of detailed engineering plans and hydraulic calculations by the City and further VCWPD and FEMA review and approval as necessary. The final review and approval would occur during plan check after the EIR and development entitlements have been approved.

#### **Runoff Water**

**Threshold**: Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious

surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?

**Impact**: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff.

#### Impact Analysis

As discussed above, the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading. The proposed project development would be protected from the FEMA 100-year floodplain and 154 existing residences could be removed from the current 100-year FEMA floodplain. The analysis also shows that the proposed project would preserve the amount of existing Conejo Creek floodplain volume. However, the proposed drainage plan does not meet the City's requirements of an unobstructed emergency overflow spillway to guarantee that the proposed development would not increase flooding hazards. Emergency overflow spillways are typically designed to handle the unreduced incoming 100-year flood peak flows without the use of mechanical backflow prevention devices. Instead of providing an unobstructed emergency spillway as prescribed above, the project is proposed to provide a series of mechanical devices and the proposed drainage pipes and culverts would require implementation of a maintenance plan to ensure their proper operation to prevent flooding in perpetuity. There can be no guaranteed assurance of the proper implementation of the maintenance plan into perpetuity and, therefore, no guarantee of compliance with Camarillo Municipal Code Chapter 16.34. Meeting the City's requirements as previously described is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and proposed development. In addition, several issues identified during the City's third party review of the Master Drainage Plan and Floodplain Analysis for the project have not been resolved and, as a result, the proposed project is unable to guarantee that there would be no increase in flooding hazards. Therefore, the impact of the project on flooding onsite or offsite would be significant and unavoidable.

#### **Flood Flows**

**Threshold**: Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

**Impact**: Implementation of the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the addition of impervious surfaces and could impede or redirect flood flows.

#### **Impact Analysis**

As discussed above, the proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading. The proposed project development would be protected from the FEMA 100-year floodplain and 154 existing residences could be removed from the current 100-year FEMA floodplain. The analysis also shows that the proposed project would preserve the amount of existing Conejo Creek floodplain volume. However, the proposed drainage plan does not meet the City's requirements of an unobstructed emergency overflow spillway to guarantee that the proposed development would not increase flooding hazards. Emergency overflow spillways are typically designed to handle the unreduced incoming 100-year flood peak flows without the use of mechanical backflow prevention devices. Instead of providing an unobstructed emergency spillway as prescribed above, the project is proposed to provide a series of mechanical devices and the proposed drainage pipes and culverts would require implementation of a maintenance plan to ensure their proper operation to prevent flooding in perpetuity. There can be no guaranteed assurance of the proper implementation of the maintenance plan into perpetuity and, therefore, no guarantee of compliance with Camarillo Municipal Code Chapter 16.34. Meeting the City's requirements as previously described is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and proposed development. In addition, several issues identified during the City's third party review of the Master Drainage Plan and Floodplain Analysis for the project have not been resolved and, as a result, the proposed project is unable to guarantee that there would be no increase flooding hazards. Therefore, the impact of the project on flooding onsite or offsite would be significant and unavoidable.

#### Flood Hazards

**Threshold**: Would the proposed project be located in a flood hazard zone and risk the release of pollutants due to project inundation?

**Impact**: The proposed project would be located in an existing flood hazard zone but would remove the development area from the flood hazard zone and reduce the release of pollutants due to project inundation.

#### **Impact Analysis**

5.9-44

As discussed previously, portions of the golf course and adjacent areas are located within a 100-year FEMA floodplain resulting primarily from overbank flow from Conejo Creek but is also affected by

tributary runoff flowing through the golf course from the local Camarillo Springs Creek watershed. In addition, there are approximately 154 mobile homes located within the 100-year FEMA floodplain to the south and southwest of the golf course.

The proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading and the proposed residential uses would be protected from the FEMA 100-year floodplain, and 154 existing residences would also be removed from the current 100-year FEMA floodplain. No new structures that would store or utilize hazardous materials are proposed within the area of the site that would continue to be within the 100-year floodplain. Therefore, the impact of the project would be less than signifiant.

#### Water Quality Plans

**Threshold**: Would the proposed project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**Impact**: Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

#### **Impact Analysis**

The PCSMP has been prepared to demonstrate compliance with the Ventura Countywide Stormwater Quality Program. As discussed previously, there would be no increased consumption of groundwater for the project's domestic water supply and the reduction of golf course area would reduce the amount of groundwater that is required to irrigate the property. The impact of the project would be less than significant.

#### **CUMULATIVE IMPACTS**

Development of the proposed project in combination with other new projects in the City of Camarillo would largely result in further development or redevelopment in an already urbanized area. Development of each related project site would be subject to the development and construction standards that are designed to ensure water quality and hydrological conditions are not adversely affected. All of the related projects would be required to implement BMPs and those that disturb more than one acre would be required to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would be less than significant.

<sup>&</sup>lt;sup>1</sup> As discussed previously, 154 existing mobile homes would be removed from the 100-year floodplain but 22 lots Along Margarita Avenue immediately adjacent to the existing lake have existing ground below elevation 112.0 and, therefore, a portion of the lots would remain in the FEMA 100-year floodplain.

On November 17, 2020, the California Department of Fish and Wildlife (CDFW) was notified by the California Office of Emergency Services of oil observed in what is referred to as Pond 7 at Camarillo Springs Golf Course and that the oil was injuring wildlife. Pond 7 is a lined, unvegetated, man-made pond that is used for drainage from the adjacent residential neighborhood to the east. It receives drainage via a 24-inch storm drain pipe beginning within Calle Cataluna and ending in the southern edge of the pond. Pond 7 is also connected to Pond 6 via a 12-inch drain pipe. Although Pond 7 is unvegetated, it can be used by native and migratory bids for drinking and rest.

A review of historical data along with geophysical exploration of the Pond 7 area and analytical laboratory soil and water samples collected during early 2021 within and adjacent to Pond 7 have concluded that the source of the oil in Pond 7 has been from an intermittent, subsurface oil and gas seep or series of seeps that are located immediately underneath or adjacent to Pond 7. No former wells are believed to be involved with or a source of the oil contained in Pond 7. The oil floating on Pond 7 is a naturally occurring crude oil along with very minor amounts of natural gas. The oil and gas is not a refined petroleum product that has escaped from a pipeline or other accidental release.

The CDFW considers the oil seeps to be a risk to local wildlife such as water fowl and amphibians that can come into contact with water features that may contain oil. It is believed that the only way to keep the oil out of the water in Pond 7 is to abandon Pond 7 as a water storage feature.

In response, the golf course property owner (not the applicant for the Camarillo Springs GPA 2017-2 project) has been working with a geotechnical firm and CDFW staff to develop a work plan to backfill the pond and provide immediate mitigation for the threat that the oil seep poses to wildlife. A new drop inlet would intercept the existing storm drain pipe from the residential neighborhood just within the golf course property and a new storm drain pipe would then extend from the drop inlet to Pond 6. The existing drain pipe from Pond 7 to Pond 6 would be abandoned in place. Approximately 1,250 cubic yards of non-hazardous sludge is located vertically above the Pond 7 liner. This sludge will be removed and then the pond will be filled with approximately 2 to 3 feet of clean, uncompacted soil imported from off-site or collected from areas at the golf course.

If the proposed Camarillo Springs GPA 2017-2 project is approved, the pipe connection between the residential neighborhood and Pond 6 would be severed and the pipe would connect to the Camarillo Springs GPA 2017-2 project 48-inch storm drain culvert, ultimately discharging into Conejo Creek.

To assess any impact to the floodplain as a result of the Pond 7 backfill project, another version of the proposed conditions was modeled to analyze the scenario with Pond 7 backfilled. The results show no change to water surface elevation or proposed condition floodplain extents, as supported by the two following figures.

Figure 5.9-17 provides a comparison between the water depth results from the Master Drainage Plan model and the revised model to include the backfilled Pond 7. As shown, the depth of water in the area of Pond 7 would be the only change – it would now be the depth of water associated with the water flowing across the backfilled pond, not the depth of water in the pond itself.

Figure 5.9-18 provides a comparison between the water surface elevation results from the Master Drainage Plan model and the revised model to include the backfilled Pond 7. As shown, the water surface elevation would not change between the two proposed conditions. The floodplain boundary is also shown to not change between the two proposed conditions.

Results from the revised modeling to include the backfilled Pond 7 indicate that Pond 7 is not used for regional level storage or detention and Conejo Creek is the primary source for the floodplain in this area. This is supported by no change in water surface elevation and no change in floodplain extents between the two proposed condition models.

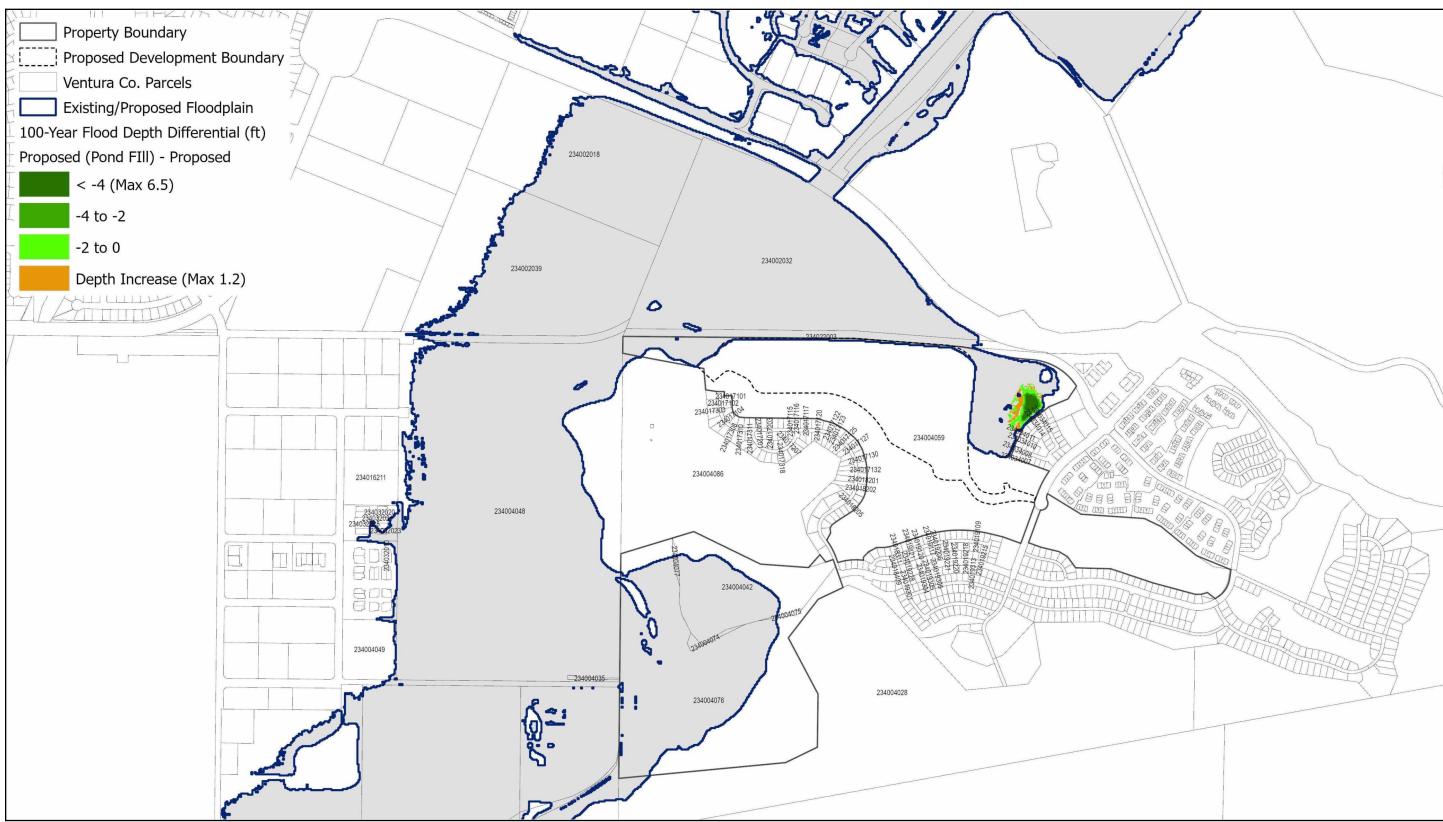
For these reasons, the proposed condition regional floodplain would be unchanged with the addition of the Pond 7 backfill project.

#### UNAVOIDABLE SIGNIFICANT IMPACTS

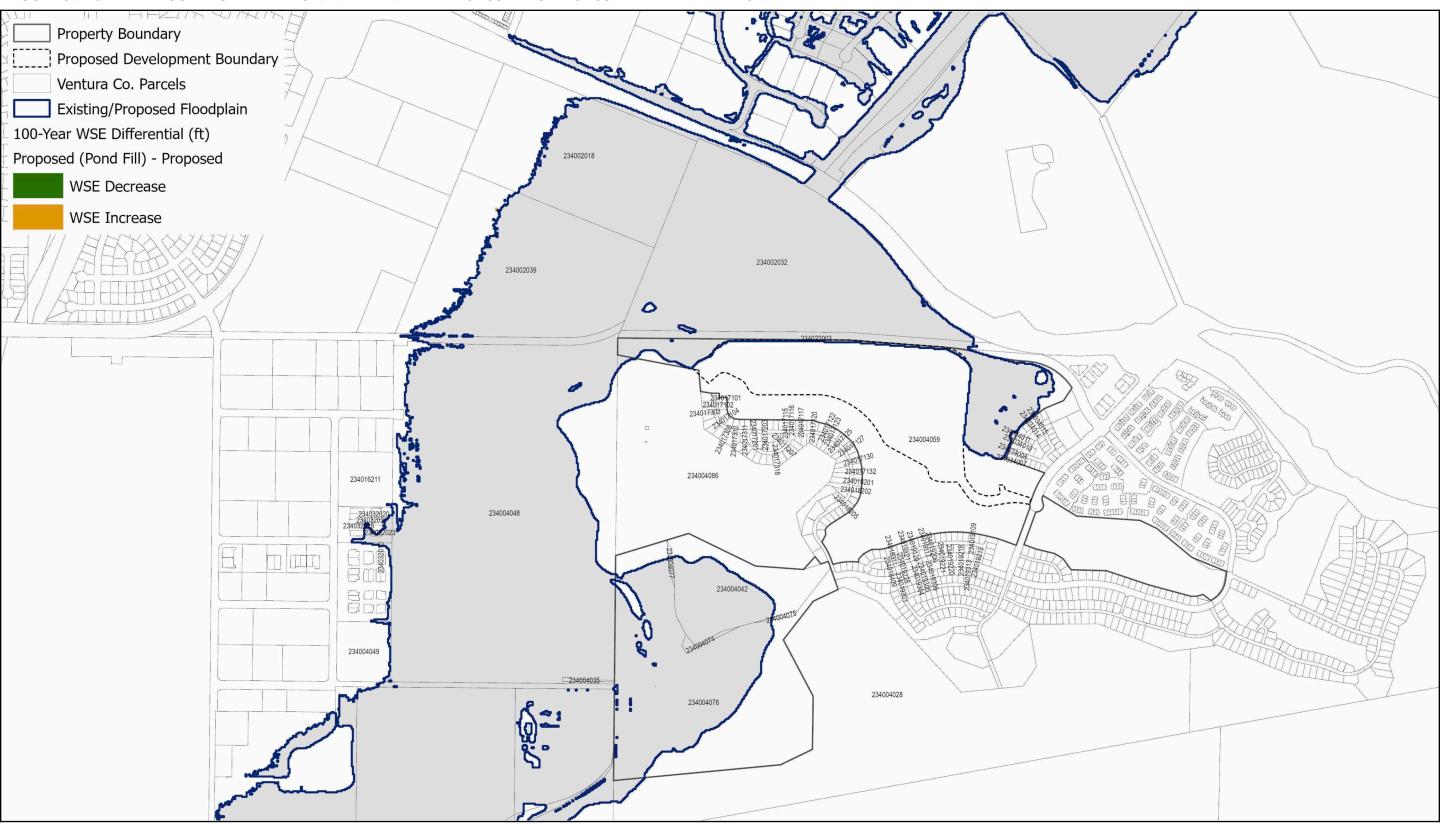
The proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading. The proposed project development would be protected from the FEMA 100-year floodplain and 154 existing residences could be removed from the current 100-year FEMA floodplain. The analysis also shows that the proposed project would preserve the amount of existing Conejo Creek floodplain volume. However, the proposed drainage plan does not meet the City's requirements of an unobstructed emergency overflow spillway to guarantee that the proposed development would not increase flooding hazards. Emergency overflow spillways are typically designed to handle the unreduced incoming 100-year flood peak flows without the use of mechanical backflow prevention devices. Instead of providing an unobstructed emergency spillway as prescribed above, the project is proposed to provide a series of mechanical devices and the proposed drainage pipes and culverts would require implementation of a maintenance plan to ensure their proper operation to prevent flooding in perpetuity. Meeting the City's requirements as previously described is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and proposed development. In addition, several issues identified during the City's third party review of the Master Drainage Plan and Floodplain Analysis for the project have not been resolved and, as a result, the proposed project is unable to guarantee that there would be no increase flooding hazards. Therefore, the impact of the project on flooding onsite or offsite would be significant and unavoidable.

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#### FIGURE 5.9-17 - DEPTH DIFFERENTIAL - PROPOSED VS. PROPOSED WITH FILLED POND 7



#### FIGURE 5.9-18 - WATER SURFACE ELEVATION DIFFERENTIAL - PROPOSED VS. PROPOSED WITH FILLED POND 7



5.9-50 Camarillo Springs GPA 2017-2

## WILDFIRE

#### **SUMMARY**

The proposed project would not substantially impair an emergency response plan or adopted emergency evacuation plan.

The proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

#### **ENVIRONMENTAL SETTING**

A wildfire is an uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Although not located in a wilderness area, the threat of a wildfire in or near Camarillo is high due to the wildland urban areas in and around the City, where structures and other human development meet or intermingle with wildland or vegetative fuels. The threat of wildfire is particularly significant during dry summer months and when there are strong Santa Ana winds. The fire season typically extends approximately five to six months, from late spring through fall. The aftermath of wildland fire produces new areas of potential landslide as burned and defoliated soils are exposed to winter rains.

#### Fire Hazard Severity Zones in Camarillo

The undeveloped hillside areas in and adjacent to the City of Camarillo present a potentially serious hazard due to the high potential for large-scale wildfires. The hills along the northern and eastern boundaries of the City are notorious for their threat of wildfires that move quickly through the area. According to the Ventura County Community Wildfire Protection Plan and the California Department of Forestry and Fire Prevention (Cal Fire), these areas are within the Very High Fire Hazard Severity Zone (VHFHSZ). The areas within and around the City of Camarillo that are designated as VHFHSZ are illustrated in Figure 5.16-1. These designations have been adopted by Ventura County Fire Protection District ordinance. As shown, the entire Camarillo Springs area is within a VHFHSZ. The VHFHSZ

within the city are the responsibility of the Ventura County Fire Protection District. The VHFHSZ areas outside of the City of Camarillo are within a State Responsibility Area.

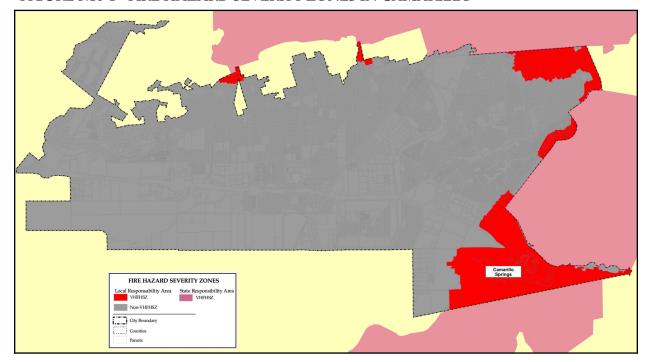


FIGURE 5.16-1 - FIRE HAZARD SEVERITY ZONES IN CAMARILLO

Major wildfires that have occurred within the Camarillo Springs area include the following:

- Conejo Grade Fire June 1957
- Conejo Grade Brush Fire September 1968
- Hill Canyon Fire October 1980
- Spring Fire May 2013

#### **Regulatory Setting**

#### California Fire Code

All developed Properties within California are subject to the standards of the California Fire Code (California Code of Regulations, Title 24, Part 9), which governs the occupancy and maintenance of all structures and premises for precautions against fire and the spread of fire, and general requirements for fire safety. The California Fire Code applies to the design, installation, inspection, operation, testing, and maintenance of all fire protection and life safety systems. Chapter 49 of the California Fire Code also provides minimum standards to increase the ability of a building to resist the intrusion of flame or burning embers being projected by a wildfire. The California Building Code (California Code of

Regulations, Title 24, Part 2) Chapter 7A identifies building material requirements for the exterior design and construction of new buildings located within a Wildland-Urban Interface Fire Area.

#### State Minimum Fire Safe Regulations

California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2 is known as the State Minimum Fire Safe Regulations established for wildfire protection by the California Board of Forestry and Fire Protection (Cal Fire). The State Minimum Fire Safe Regulations apply to building, construction, and development within the VHFHSZ. The standards provide for emergency access, signing and building numbering, private water supply reserves for emergency fire use, vegetation modification, building setbacks, fuel breaks, greenbelts, and measures to preserve undeveloped ridgelines. Prior to July 1, 2021, the State Minimum Fire Safe Regulations only applied to the State Responsibility Areas outside of local jurisdictions; however, they now apply to all new development within the VHFHSZ.

#### Ventura County Fire Code

The requirements of the State Minimum Fire Safe Regulations are implemented at the local level through the Ventura County Fire Code. Key standards of the Ventura County Fire Code that apply to the proposed project are as follows:

- Standard 416 Landscape and Fuel Modification Zone Plans
  - Fire Department review is required when a project is located within a State mapped Very High, High, or Moderate Fire Hazard Severity Zone or a local Hazardous Fire area.
  - All vegetation within the 0-100 foot zone around buildings is subject to defensible space laws and regulations. This includes ornamental plants, cultivated landscape plants, native plants, trees, shrubs, grasses, weeds, and wildland vegetation.
- Standard 515 Defensible Space and Fuel Modification Zones
  - Zone 0 Ember-Resistant Zone (0 to 5 feet from structure)
    - Herbaceous non-woody ground cover not exceeding 3-inches high.
    - Non-woody small herbaceous or succulent plants not exceeding two (2) feet high. Plants shall be spaced a minimum of 2x the height from other plants.
    - Plants shall have a minimum clearance of 2x the plant height below and adjacent to windows or other openings into the structure, including vents.
    - All ground cover and plants shall be set back from structures and decks 1x the height of the plant or 12-inches, whichever is greater.

- Vines and climbing plants are not allowed on structures, including decks, patio / shade structures, and any fences within 5 feet of a building.
- No combustible landscape mulch or wood chips. Use clear soil, rocks, gravel, or concrete.
- No combustible landscape boards and timbers.
- Only non-combustible pots and planting boxes at ground level shall be used.
- No new window planting boxes shall be attached to the structure.
- Firewood is prohibited in Zone 0.
- Artificial or synthetic grass is prohibited within Zone 0.
- Vegetation is prohibited underneath any deck.
- Other fuels underneath decks may be limited and shall not cause an ignition due to embers.
- Vegetation on decks shall meet the requirements of Zone 0 regardless of the distance to the structure.
- Roofs and gutters on buildings shall be maintained free of any leaves, needles, or other vegetative combustible materials.
- Combustible fencing shall not be installed back-to-back. Two parallel combustible fences shall be separated by at least 5 feet.
- There shall be no mulch, combustible vegetation, or any other combustible material lined at the bottom and within 12 inches on each side of combustible fences.
- Fencing and gates that are not parallel to the building, and are within 5 feet of the building, shall be of non-combustible material.
- Zone 1 Intermediate Zone (5 to 30 feet from structure)
  - New trees shall be planted and maintained so that the tree's drip line at maturity is a minimum
    of 10 feet from any combustible structure.
  - Firewood shall be relocated outside Zone 1 unless completely covered in a secured, fire-resistant enclosure or covered with a secured, fire-resistant material, and not exceeding 1,000-cubic feet.
- Additional Requirements of All Zones

- Prohibited Plants. Plants and trees listed in Fire Department Guideline 410 Prohibited Plant
  List or identified as "\*Target" (undesirable) plants and trees in Fire Department Guideline 417 Plant Reference Guide shall not be planted within any zone. It is highly recommended that no
  new invasive plants be installed, and that any existing invasive plants be removed.
- Grasses. Natural or annual grasses shall be moved to a maximum height of 3-inch stubble with clippings removed.
- Ground Clearance of Trees. Trees exceeding 6-feet in height shall be limbed up from the ground 6-feet or 1/3 the height of the tree, whichever is less. Exception: Fruit trees when approved, shall provide a minimum 12-inch clearance above ground.
- Ground cover under tree canopy. When approved ground cover and shrubs are located underneath trees, the vertical clearance to the lowest branch of the tree canopy shall not be less than three times the height of ground cover or shrub under or adjacent to the tree. The horizontal clearance shall be 3 feet from the trunk of the tree.
- Maintenance. All plants and trees, including dried palm fronds, shall be maintained free of dead and dying wood, leaves, and limbs that can increase ability to ignite and/or carry fire.
- Mulch and Wood Chips. Combustible mulch and wood chips shall comply with Fire Department Standard 517 and are not allowed within 5 feet of structures.
- Accessory Storage Buildings. New accessory buildings of any size installed after January 1, 2023
  and located within 50 feet of an applicable building on the same parcel shall be constructed of
  non-combustible materials or of ignition-resistant materials as required in California Building
  Code (CBC) Section 704A.2.
- Chapter 49 Requirements for Wildland-Urban Interface Fire Areas
  - Section 4905.4 Fencing
    - 4905.4.2 New Fencing. New fencing and gates installed on or after January 1, 2023, shall comply with the following:
      - 1. Combustible fencing shall not be installed back-to-back. Two parallel combustible fences shall be separated by at least 5 feet.
      - 2. There shall be no mulch, combustible vegetation, or any other combustible material lined at the bottom and within 12 inches on each side of combustible fences.
      - 3. Fencing and gates that are not parallel to the building, and are within 5 feet of the building, shall be of non-combustible material.

- Section 4905.5 Building Setbacks
  - 4905.5.2 Setback for Structures in FHSZs. New Structures in any FHSZ within the SRA, or Very High FHSZ in the LRA, shall be setback in accordance with California Code of Regulations, Title 14, Division 1, §1276.01 as amended from time-to-time. When the required setback cannot be provided, alternate methods shall be provided to reduce Structure-to-Structure ignition by incorporating a combination of features such as, but not limited to:
    - 1. Ignition-Resistance fencing and gates.
    - 2. Noncombustible material extending five (5) feet horizontally from the furthest extent of the Building.
    - 3. Hardscape landscaping.
    - 4. Reduction of exposed windows on the side of the Building with less than the required setback.

#### THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact due to wildfire if it is located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

#### PROJECT IMPACTS AND MITIGATION MEASURES

#### **Emergency Evacuation**

**Threshold**: Would the proposed project substantially impair an emergency response plan or adopted emergency evacuation plan?

**Impact**: The proposed project would not substantially impair an emergency response plan or adopted emergency evacuation plan.

#### **Impact Analysis**

According to the City of Camarillo Safety Element 2013, evacuation routes in Camarillo are dependent upon the event and need for evacuation. During a breach of the Bard Reservoir, the only required evacuation route would be the movement onto high ground out of the flood plain, which is generally north of Ponderosa Road, westerly of Ponderosa and Las Posas Roads and easterly of Calleguas Creek northerly of the Ventura Freeway (U.S. 101). In the event of a major chemical spill or other significant disaster, the City would be evacuated using U.S. 101 for east and westerly traffic or Lewis Road for evacuating the residents to the north or south. The County Office of Emergency Services (OES) under the Sheriff's Department is responsible for evacuations in Ventura County. Neither the City nor the County have adopted emergency response plans or emergency evacuation plans that are specific to wildfires in the Camarillo area.

As discussed in the Hazards and Hazardous Materials section of this EIR, the City of Camarillo requested an evaluation of an emergency evacuation of the Camarillo Springs community assuming a major catastrophe (fire, flood, earthquake, etc.) in order to evaluate the time required for 100% evacuation of the community. Access to the Camarillo Springs community is limited to two primary routes: 1) the U.S. Highway 101/Camarillo Springs Road interchange and 2) the Ridge View Street-Adohr Lane connection to Pancho Road. Emergency evacuation times were evaluated assuming three evacuation scenarios: 1) assuming that the connection to U.S. Highway 101 is blocked, 2) assuming that the Ridge View Street-Adohr Lane connection is blocked, and 3) assuming that both connections are open.

The analysis presented in the Hazards and Hazardous Materials section of this EIR concludes that the existing Camarillo Springs community could be evacuated in 51 minutes when access to/from U.S. Highway 101 access is not available, in 26 minutes when the Ridge View Street-Adohr Lane access is blocked, and in 17 minutes when no access is blocked. With existing + project traffic, the Camarillo Springs community could be evacuated in 61 minutes when access to/from U.S. Highway 101 access is not available, in 31 minutes when the Ridge View Street-Adohr Lane access is blocked, and in 20 minutes when no access is blocked. There are no official standards for evacuation times. The proposed project would increase the existing outbound evacuation time by a maximum of 10 minutes.

The OES only requires that there be multiple ingress/egress routes to allow for evacuations. As demonstrated in the Hazards and Hazardous Materials analysis, the multiple existing routes allow for evacuation of the Camarillo Springs Community. The proposed project would not change the existing roadways surrounding the site and would not eliminate any existing evacuation routes. Therefore, proposed project would not substantially impair an emergency response plan or adopted emergency evacuation plan. The impact of the project would be less than significant.

#### **Exacerbate Wildfire Risks**

**Threshold**: Would the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**Impact**: The proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

#### **Impact Analysis**

The proposed new residential uses and redeveloped golf course would occur within the existing boundaries of the Camarillo Springs Golf Course. As illustrated in Figure 5.16-1, the entire Camarillo Springs area, including the existing residential areas surrounding the golf course, are located within a VHFHSZ. The proposed residential uses and redeveloped golf course would be required to comply with the Ventura County Fire requirements for new development within a VHFHSZ. The proposed residential uses would also be located further from the nearby hillsides than other existing residential uses within the Camarillo Springs area. As such, the project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The impact of the project would be less than significant.

#### Infrastructure Wildfire Risks

**Threshold**: Would the proposed project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

**Impact**: The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

#### Impact Analysis

The proposed new residential uses and redeveloped golf course would occur within the existing boundaries of the Camarillo Springs Golf Course. The project would not require special features such as firebreaks or fuel modification setbacks to protect the proposed uses from wildfires.

The proposed residential development would connect to the existing 12-inch water main is located within Ridge View Street for potable water use. The golf course would continue to be irrigated by private water from existing wells. Electrical power to the project site would continue to be provided by Southern California Edison via the existing underground infrastructure located within Camarillo Springs Road and Ridgeview Street. Natural Gas would be continuously provided to the project site by the Southern

California Gas Company via an existing six-inch gas line infrastructure in the local vicinity. As such, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The impact of the project would be less than significant.

#### **Post-Wildfire Risks**

**Threshold**: Would the proposed project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

**Impact**: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

#### Impact Analysis

Areas within the Camarillo Springs community are exposed to risks of flooding and landslides as a result of runoff and instability after wildfires within the adjacent hills. However, the proposed residential area is separated from the nearest hills by the existing mobile home community and the proposed golf course/lake area, and this area of the project site is not subject to any landslides. (Reference the Geology and Soils section of this EIR.) Flooding at the golf course is a result of overflows from Conejo Creek during large storm events and is not a result of post-fire runoff from the nearby hills. The project's design is proposed to preserve the amount of existing floodplain storage along Conejo Creek, to maintain or reduce base flood elevations through the area, and to remove the 154 existing mobile homes from the current FEMA 100-year floodplain. These drainage changes would not affect the adjacent hillsides. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

#### **CUMULATIVE IMPACTS**

At the present time, the only other related projects within the Camarillo Springs area are the request to modify the conditional of approval for the Village Greens Market located at 795 Camarillo Springs Road and the work plan to backfill Pond 7 at Camarillo Springs Golf Course. No other new development project is proposed or approved in the Camarillo Springs area. The work plan to backfill Pond 7 does not involve the development of any new potentially flammable structures. As such, no significant cumulative impacts associated with wildfire in the Camarillo Springs area are expected.

### UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant wildfire impacts.

# ALTERNATIVES TO THE PROPOSED PROJECT

#### INTRODUCTION TO THE ALTERNATIVES ANALYSIS

As stipulated in Section 21002.1(a) of the CEQA Statutes (Public Resources Code):

The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided.

More specifically, the State CEQA Guidelines (Section 15126.6) require an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives need not be exhaustive, but it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible."

Section 15126.6(a) of the State CEQA Guidelines states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

#### Purpose

Section 15126.6(b) of the State CEQA Guidelines states:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

#### Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the State CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

#### Level of Detail

The State CEQA Guidelines do not require the same level of detail in the alternatives analysis as in the analysis of the proposed project. Section 15126.6(d) of the State CEQA Guidelines states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

#### SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT

The proposed project would result in the redevelopment and renovation of Camarillo Springs Golf Course, which has been developed, operational, and modified for more than 45 years. The current General Plan land use designation for the site is Public/Quasi-Public and the underlying zoning is RE (Rural Exclusive) and RE-1 Acre.

As discussed in the Environmental Impact Analysis section of this EIR, all potential environmental impacts of the proposed project would be reduced to less than significant levels through the mitigation measures recommended in this EIR with the exception of hydrology and water quality. The proposed project would substantially alter the existing drainage pattern of the site or area through a change in site grading. The proposed project development would be protected from the FEMA 100-year floodplain and 154 existing residences could be removed from the current 100-year FEMA floodplain. The analysis also shows that the proposed project would preserve the amount of existing Conejo Creek floodplain volume. However, the proposed drainage plan does not meet the City's requirements of an unobstructed emergency overflow spillway to guarantee that the proposed development would not increase flooding hazards. Emergency overflow spillways are typically designed to handle the unreduced incoming 100year flood peak flows without the use of mechanical backflow prevention devices. Instead of providing an unobstructed emergency spillway as prescribed above, the project is proposed to provide a series of mechanical devices and the proposed drainage pipes and culverts would require implementation of a maintenance plan to ensure their proper operation to prevent flooding in perpetuity. Meeting the City's requirements as previously described is not possible by this project with the proposed fill embankment and drainage design concept. This, combined with the significant historical events in Camarillo Springs including brush fires, intense rain storms and destructive mud and debris flows, may result in potential significant flooding risks to the existing homes and proposed development. In addition, several issues identified during the City's third party review of the Master Drainage Plan and Floodplain Analysis for the project have not been resolved and, as a result, the proposed project is unable to guarantee that there would be no increase in flooding hazards. Therefore, the impact of the project on flooding onsite or offsite would be significant and unavoidable.

Based on the State CEQA Guidelines requirements discussed above, this analysis is required to focus on alternatives to the proposed project that could avoid or substantially lessen the significant and unavoidable impacts associated with flooding hazards onsite and offsite. In addition, the consideration and discussion of alternatives in an EIR is governed by a "rule of reason" that includes feasibility (State CEQA Guidelines Section 15126.6(f)(1). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the

proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

#### ALTERNATIVES REJECTED FROM FURTHER CONSIDERATION

#### **Alternative Site Locations**

Pursuant to State CEQA Guidelines Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. In addition, the project would need to feasibly accomplish most of the basic objectives of the project when developed at the alternative site. Because the City of Camarillo is the lead agency for the project, the alternative site would also need to be located within the jurisdiction of the City.

Accomplishing the primary project objective of increasing the City's housing stock and diversifying the range of housing opportunities for a special needs population (seniors) in an area adjacent to existing, established residential communities could occur by developing new senior housing units at other properties within the City of Camarillo. However, the two primary project objectives of abating existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency and implementing comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo are specific to the proposed project site. Likewise, the primary project objective of renovating an existing privately-owned golf course (Camarillo Springs Golf Course) to address changing demands for golf alongside interrelated recreational amenities can only be met through development at the proposed project site.

For these reasons, the development of the proposed project at another site within Camarillo is rejected as infeasible.

#### Widening and/or Deepening the Conejo Creek Channel

In theory, it may be possible to lower the existing flood elevation of Conejo Creek by widening and/or deepening the Conejo Creek channel. The specific design characteristics that would be required to reduce the existing flood elevation are presently unknown and are well beyond the scope of this EIR. This effort would would require substantial alterations to the Conejo Creek channel and likely other properties along Conejo Creek. Therefore, any action to widen and/or deepen the Conejo Creek channel would result in greater impacts to riparian biological resources than the proposed project. Most of the properties along Conejo Creek south of U.S. Highway 101 and the project site are zoned and used for agriculture. Therefore, widening the channel would result in impacts to agricultural resources. These are impacts that

do occur with the proposed project. In addition, it is not known whether the project applicant could reasonably acquire, control or otherwise have access to the properties where the widening of Conejo Creek would need to occur. For these reasons, widening and/or deepening the Conejo Creek channel is rejected as infeasible for the proposed project.

## Constructing a Barrier Along the Border of the Camarillo Springs Country Club Village

It might be possible to remove the 154 existing residences within the current 100-year FEMA floodplain by constructing a barrier along the southern edge of the golf course adjacent to the Camarillo Springs Country Club Village. This effort would require more excavation and transfer of soil from the southern golf course area to provide the additional earth material for the barrier and the barrier would require more floodwater storage within the southern golf course area. This area of the Camarillo Springs Country Club Village is part of the South Adjacent Camarillo Springs Watershed that drains towards the golf course. Constructing a barrier that is impervious to flood waters would require a reworking of the existing drainage within the Camarillo Springs Country Club Village. The specific actions that would need to occur in order to drain the existing residential area while protecting it from flooding with a perimeter barrier are not known at this time and the project applicant may not receive approval from the existing residents to provide any improvements within that neighborhood. The barrier may also act as a dam or levee and increase flooding hazards within the residential neighborhood if the drainage system were to fail during a major storm event. This is a similar situation to the significant and unavoidable impact of the proposed project. The barrier would also be expected to reduce views of the golf course from the existing residences. For these reasons, constructing a barrier along the southern edge of the golf course adjacent to the Camarillo Springs Country Club Village is rejected as infeasible for the proposed project.

# Purchasing and Removing the Existing Residences within the Current 100-year FEMA Floodplain

In theory, it may be possible for the project applicant to purchase and then physically remove the 154 existing residences within the current 100-year FEMA floodplain. In this case, the parcels occupied by the 154 existing residences would become permanent vacant land in the midst of the Camarillo Springs Country Club Village. This would allow the proposed residential development and golf course renovations to proceed after the 154 parcels are vacant without the need to prevent water from Conejo Creek flooding the reconfigured golf course. The existing flood potential would remain for the golf course and surrounding uses but the existing residences that the presently within the floodplain would not longer be there. This alternative could create a new aesthetic impact through the potential degradation of the vacant former residential lots if they are not improved or maintained; however, that would be speculative. This would be a negative aesthetic effect on the remaining existing residences that surround

the newly vacated lots. In addition, it is not known whether the project applicant could reasonably acquire, control or otherwise have access to the existing residential properties within the existing floodplain. For this reason, purchasing and then physically removing the 154 existing residences within the current 100-year FEMA floodplain is rejected as infeasible for the proposed project.

#### ALTERNATIVES TO THE PROPOSED PROJECT

Based on the State CEQA Guidelines requirements discussed above, this analysis is required to focus on alternatives to the proposed project that could avoid or substantially lessen the significant and unavoidable impacts associated with flooding hazards onsite and offsite. The alternatives to the proposed project that were considered for this EIR are described and evaluated in the following discussions.

#### No Project Alternative

As required by CEQA, a no project alternative is analyzed in this EIR section. Section 15126.6(e)(2) of the State CEQA Guidelines states that the no project alternative "analysis shall discuss the existing conditions at the time the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Furthermore, Section 15126.6(e)(3)(B) of the State CEQA Guidelines states:

If approval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

As discussed previously in this EIR, the current General Plan land use designation for the golf course is Public/Quasi-Public and the underlying zoning is RE and RE-1 Acre. The Conejo Creek area of the property is designated as a Waterway Linkage in the City of Camarillo General Plan Land Use Element and is zoned Open Space. Public uses permitted in these designations include parks, schools, libraries, police facilities and fire facilities. The quasi-public classification of the General Plan also permits those uses which are private in nature, but that serve the public needs. This includes such uses as hospitals, private educational institutions, religious institutions, and recreational uses such as golf courses.

The RE zone is a large lot residential zone with lots varying in size from 10,000 square feet to one acre or larger in size with a limited area used for mobile home parks. Pursuant to Section 19.12.030 of the Camarillo Municipal Code, uses permitted within the RE zone include the following:

- Agricultural uses. Land within the RE zone may be used for the growing of agricultural crops and uses
  ancillary thereto but no poultry or animals may be raised or kept on the lot or parcel except as
  otherwise permitted by this title and in accordance with the standards set forth herein;
- One-family dwelling of a permanent character placed in a permanent location;
- Day care, small family and large family;
- Elementary, junior high and high schools offering a full curriculum as required by state law but excluding boarding schools with private colleges being permitted under a conditional use permit;
- Farm animals and fowl subject to the limitations of conditions;
- Boarding and care of horses including accommodations and living quarters for groom and caretakers located within the same building when the parcel of land comprises ten acres or more;
- Fire stations, public buildings and other facilities of federal, state, county and city agencies, excluding detention facilities;
- Horticultural and floricultural of all types including nurseries, hothouses, greenhouses, orchards, flower and vegetable gardens, and accessory structures necessary for such use (excluding retail sales);
- Movie sets or locations which may contain structures of a temporary nature to be used for photographic
  purposes in connection with the production of motion pictures and television programs; provided,
  however, such sets or locations may not be used as a permanent studio or for other similar types of
  uses;
- Petroleum products storage required for agricultural uses on the premises; storage not to exceed one thousand gallons of petroleum products to be stored in a manner approved by the fire department and the community development department;
- Pigeons and small birds;
- Public parks, playgrounds and athletic fields.

Pursuant to Section 19.12.030 of the Camarillo Municipal Code, uses that are permitted within the RE zone with a conditional use permit include the following:

- Animals, fowl not otherwise permitted in this zone excluding livestock feeding pens;
- Boardinghouses and rest homes;

- Cemeteries, crematoriums and mausoleums;
- Churches;
- Commercial stables and riding academies;
- Community and publicly owned recreational centers, clubhouses and similarly used buildings and structures open to the public;
- Day care facilities for more children than allowed by right;
- Golf courses, tennis clubs, swim clubs, including clubhouse and accessory restaurant, pro shop, either
  publicly or privately owned but not including miniature golf courses;
- Public utility buildings and structures;
- Schools, colleges and boarding schools and similar establishments for education and training facilities
  and housing for the accommodating of faculty, students, trainees and other persons associated with
  such establishments when located on the same parcel or continuous parcels of land upon which a school
  or establishment is located;
- Natural resources, development of, including necessary structures and appurtenances;
- Mobilehome parks and mobilehome subdivisions;
- Temporary agricultural stands.

Under the No Project Alternative, the proposed project would not be constructed and the site would remain as a golf course. Under this scenario, none of the impacts evaluated in this EIR would occur. The golf course could continue to be operated in its current condition, it could be renovated or re-designed, or it could close.

A No Project alternative would not meet any of the objectives for the proposed project. The No Project Alternative would not abate existing flood hazards for current residents located immediately south of the project site. No new senior housing would be provided. No development in furtherance of the City's Housing Element would be taken, and no trails would be constructed or connected.

It is possible that a subsequent applicant could renovate, redesign, or redevelop the golf course within the existing limits of the golf course or expand the golf course within the existing property boundaries. It is also possible that another application could be submitted to the City of Camarillo in the near future requesting approval to redevelop the site with uses to the extent permitted by the existing RE and RE-1 Acre zones and General Plan land use designation of Public/Quasi-Public. This could include the uses described above. Therefore, the No Project Alternative would not preclude development of the project site; it may instead temporarily delay to a later date the redevelopment of the site with a potential range

of new uses. Any such development would need to raise the proposed building pads above the 100-year floodplain and provide a corresponding amount of Conejo Creek floodplain storage. This may or may not include provisions to remove the existing residences from the 100-year floodplain. Redevelopment consistent with the underlying existing zoning could create greater impacts associated with transportation, air quality, greenhouse gas emissions, noise, public services, and utilities if the site is developed with uses that are more intensive than the proposed project (e.g., an educational institution, a hospital, public agency offices, active athletic fields, etc.). If such development eliminates the golf course altogether, such development would likely result in greater biological resources impacts than the proposed project, which retains a substantial portion of the golf course.

It is speculative and beyond the scope of this EIR to evaluate the potential development of the site under every use that is permitted in the RE and RE-1 Acre zones. Therefore, for purposes of this analysis, it is assumed that the existing golf course would continue to operate in its existing condition, which would result in fewer impacts than the proposed project. The No Project Alternative would not result in potential significant flooding risks to the existing homes and proposed development, and it also would not remove any of the existing residences in the Camarillo Springs area from the 100-year floodplain.

## No Conejo Creek Flood Protection Alternative

This alternative would include the development of the proposed 248 age-restricted (55+) single family detached dwelling units along with the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative may reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

The following compares the potential impacts of this No Conejo Creek Flood Protection Alternative to those of the proposed project:

Aesthetics and Visual Resources: The aesthetic characteristics of the No Conejo Creek Flood Protection Alternative residential area would be similar to those of the proposed project. This alternative would not have a substantial adverse effect on a scenic vista. It would not permanently change any scenic resources designated for agriculture, open space, historic sites, or waterways to urban uses and it would not conflict with applicable zoning or other regulations governing scenic quality. This alternative could create a new source of substantial light or glare but it would be subject to the same light-shielding requirements and

mitigation measures as the proposed project. However, the proposed project's impacts to aesthetics and visual resources are also less than significant.

**Air Quality**: This alternative may generate fewer construction-related emissions than the proposed project since there may be less grading. The operational air quality impacts of this alternative would be the same as the proposed project since it would provide the same number of residential units and golf course holes. However, the proposed project's air quality impacts are also less than significant with mitigation.

**Biological Resources**: This alternative would affect the same sensitive biological resources but may have slightly lower impacts than the proposed project since there may be less grading in the southern golf course area. However, the proposed project's biological resources impacts are also less than significant with mitigation.

**Cultural Resources** and **Tribal Cultural Resources**: This alternative would have the same potential to disturb previously undiscovered archaeological resources (unanticipated discoveries) during grading as the proposed project and would be subject to the same mitigation measures as the proposed project. However, the proposed project's cultural resources impacts are also less than significant with mitigation.

**Energy**: This alternative may require less energy during construction due to less grading. The operational energy demand of this alternative would be the same as the proposed project since it would provide the same number of residential units and golf course holes. However, the proposed project's energy impacts are also less than significant.

**Geology and Soils**: The impacts associated with the development of this alternative are the same as those associated with the proposed project. This alternative would be subject to the same mitigation for the protection of previously undiscovered paleontological resources as the proposed project.

**Greenhouse Gas Emissions**: This alternative may generate fewer construction-related GHG emissions since there may be less grading. The operational GHG impacts of this alternative would be the same as the proposed project since it would provide the same number of residential units and golf course holes. However, the proposed project's greenhouse gas emissions impacts are also less than significant.

Hazards and Hazardous Materials: The impacts associated with the development of this alternative are the same as those associated with the proposed project although this project may have nominally less potential to release hazardous materials during site grading since there may be less grading in the southern golf course area. This alternative would be subject to the same mitigation for the prevention of hazardous materials releases as the proposed project. However, the proposed project's hazards and hazardous materials-related impacts are also less than significant with mitigation.

Hydrology and Water Quality: This alternative would be subject to the same regulations for the control and treatment of water during construction and operation as the proposed project. The new residential

development area would be raised above the base flood elevation; thus, ensuring that the new development would not increase flooding hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. This alternative would not include the need for an unobstructed spillway, thus eliminating the one significant and unavoidable impact of the proposed project. In doing so, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain.

**Land Use and Planning**: The land use and planning impacts associated with the development of this alternative are the same as those associated with the proposed project. Like the proposed project, this alternative would require approval of a General Plan Amendment and change of zone.

**Noise and Vibration**: This alternative would generate less construction-related noise and vibration levels since there may be less grading in the southern golf course area. The operational noise impacts of this alternative would be the same as the proposed project since it would provide the same number of residential units and golf course holes. However, the proposed project's noise impacts are also less than significant.

**Population and Housing:** This alternative would generate the same number of new residents (approximately 496) and would result in the same less than significant impacts to population and housing as the proposed project.

**Public Services and Recreation**: This alternative would generate the same demand for public services and recreational amenities as the proposed project. However, the proposed project's public services and recreational impacts are also less than significant.

**Transportation**: This alternative would generate the same number of vehicle trips and vehicle miles traveled (VMT) as the proposed project, and result in the same less than significant transportation impacts as the proposed project.

**Utilities and Service Systems**: This alternative would generate the same demand for public utilities and service systems as the proposed project since it would provide the same number of residential units and golf course holes. However, the proposed project's utilities and service systems impacts are also less than significant.

**Wildfire**: The risk to wildfire of the new residential uses under this alternative would be the same as the proposed project. However, the proposed project's wildfire impacts are also less than significant.

Development of the No Conejo Creek Flood Protection Alternative would meet most of the primary objectives for the project. However, this alternative would not meet the following objectives for the project:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

## **Reduced Density Alternative**

The proposed project involves a General Plan Amendment (GPA) to change the land use designation for a 31-acre portion of the property to Low-Medium Density Residential (5.1 - 10 dwelling units per acre). The Reduced Density Alternative would involve a GPA to change the land use designation for the same 31-acre portion of the property to Low Density Residential (5 dwelling units per acre max). This would result in the development of up to 150 new age-restricted (55+) residential units.

This alternative would include the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative may reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

The following compares the potential impacts of this Reduced Density Alternative to those of the proposed project:

Aesthetics and Visual Resources: The aesthetic characteristics of the Reduced Density Alternative residential area would be similar to those of the proposed project. This alternative would not have a substantial adverse effect on a scenic vista. It would not permanently change any scenic resources designated for agriculture, open space, historic sites, or waterways to urban uses and it would not conflict with applicable zoning or other regulations governing scenic quality. This alternative could create a new source of substantial light or glare but it would be subject to the same light-shielding requirements and mitigation measures as the proposed project. However, the proposed project's impacts to aesthetics and visual resources are also less than significant.

**Air Quality**: This alternative may generate fewer construction-related emissions than the proposed project since there may be less grading. This alternative would also generate fewer operational emissions since there would be fewer new residences and associated vehicle trips. However, the proposed project's air quality impacts are also less than significant with mitigation.

**Biological Resources**: This alternative would affect the same sensitive biological resources but may have slightly lower impacts than the proposed project since there may be less grading in the southern golf course area. However, the proposed project's biological resources impacts are also less than significant with mitigation.

**Cultural Resources** and **Tribal Cultural Resources**: This alternative would have the same potential to disturb previously undiscovered archaeological resources (unanticipated discoveries) during grading as the proposed project and would be subject to the same mitigation measures as the proposed project. However, the proposed project's cultural resources impacts are also less than significant with mitigation.

**Energy**: This alternative may require less energy during construction due to less grading. The operational demand for energy would be less due to fewer new residences. However, the proposed project's energy impacts are also less than significant.

**Geology and Soils**: The impacts associated with the development of this alternative are the same as those associated with the proposed project. This alternative would be subject to the same mitigation for the protection of previously undiscovered paleontological resources as the proposed project.

**Greenhouse Gas Emissions**: This alternative may generate fewer construction-related GHG emissions since there may be less grading. The operational GHG emissions of this alternative would be less as there would be fewer new residences and associated vehicle trips. However, the proposed project's greenhouse gas emissions impacts are also less than significant.

Hazards and Hazardous Materials: The impacts associated with the development of this alternative are the same as those associated with the proposed project although this project may have nominally less potential to release hazardous materials during site grading since there may be less grading in the southern golf course area. This alternative would be subject to the same mitigation for the prevention of hazardous materials releases as the proposed project. However, the proposed project's hazards and hazardous materials-related impacts are also less than significant with mitigation.

Hydrology and Water Quality: This alternative would be subject to the same regulations for the control and treatment of water during construction and operation as the proposed project. The new residential development area would be raised above the base flood elevation; thus, ensuring that the new development would not increase flooding hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. This alternative would not include the need for an unobstructed spillway, thus eliminating the one significant and unavoidable impact of the proposed project. In doing so, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain.

Land Use and Planning: The land use and planning impacts associated with the development of this alternative are similar to those associated with the proposed project. Like the proposed project, this alternative would require approval of a General Plan Amendment and change of zone.

**Noise and Vibration**: This alternative may generate less construction-related noise and vibration levels since there may be less grading in the southern golf course area. This alternative would also generate less operational noise levels since there would be fewer new residences and associated vehicle trips. However, the proposed project's noise impacts are also less than significant.

**Population and Housing**: This alternative would generate a lesser number of new residents (approximately 300) than the proposed project. However, this alternative would result in the same less than significant impacts to population and housing as the proposed project.

**Public Services and Recreation**: This alternative would generate less demand for public services and recreational amenities than the proposed project. Therefore, impacts would be slightly less than the proposed project. However, the proposed project's public services and recreational impacts are also less than significant.

**Transportation**: This alternative would result in similar transportation impacts as the proposed project. While this alternative would generate fewer traffic trips since there would be fewer new residences, vehicle miles traveled per capita would likely be the same, as overall the project would have fewer residents.

**Utilities and Service Systems**: This alternative would generate less demand for public utilities and service systems than the proposed project and therefore would have slightly less impact than the proposed project. However, the proposed project's utilities and service systems impacts are also less than significant.

**Wildfire**: The risk to wildfire of the new residential uses under this alternative would be the same as the proposed project. However, the proposed project's wildfire impacts are also less than significant.

Development of the Reduced Density Alternative could meet most of the primary objectives for the project. However, this alternative would provide substantially fewer dwelling units than the proposed project and would not meet the following primary objectives:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

## **Reduced Intensity Alternative**

This alternative would develop new residential units consistent with the same Low-Medium Density Residential (5.1 - 10 dwelling units per acre) designation as the proposed project but would cover an area of 15 acres rather than the 31 acres of the proposed project. This alternative would result in the development of up to 150 new age-restricted (55+) residential units.

This alternative would include the proposed renovations to the existing golf course. The new residential development area would be raised above the base flood elevation and the reconfigured golf course would preserve the amount of existing floodplain storage along Conejo Creek to maintain or reduce base flood elevations through the area; thus, not increasing flood hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. With no flood protection barrier, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain. This alternative would reduce the amount of grading necessary as the excavation depth in the southern golf course area could be shallower.

The following discussions compare the potential impacts of this Reduced Intensity Alternative to those of the proposed project:

Aesthetics and Visual Resources: The aesthetic characteristics of the Reduced Intensity Alternative residential area would be similar to those of the proposed project. This alternative would not have a substantial adverse effect on a scenic vista. It would not permanently change any scenic resources designated for agriculture, open space, historic sites, or waterways to urban uses and it would not conflict with applicable zoning or other regulations governing scenic quality. This alternative could create a new source of substantial light or glare but it would be subject to the same light-shielding requirements and mitigation measures as the proposed project. However, the proposed project's impacts to aesthetics and visual resources are also less than significant.

**Air Quality**: This alternative would generate fewer construction-related emissions that the proposed project since there would be less grading and fewer operational emissions as there would be fewer new residences and associated vehicle trips. However, the proposed project's air quality impacts are also less than significant with mitigation.

**Biological Resources**: This alternative would affect the same sensitive biological resources but may have slightly lower impacts than the proposed project since there would be less grading in the southern golf course area. However, the proposed project's biological resources impacts are also less than significant with mitigation.

Cultural Resources and Tribal Cultural Resources: This alternative would have the same potential to disturb previously undiscovered archaeological resources (unanticipated discoveries) during grading as

the proposed project and would be subject to the same mitigation measures as the proposed project. However, the proposed project's cultural resources impacts are also less than significant with mitigation.

**Energy**: This alternative would require less energy during both construction and operation due to less grading and construction activity and fewer new residences. However, the proposed project's energy impacts are also less than significant.

**Geology and Soils**: The impacts associated with the development of this alternative are the same as those associated with the proposed project. This alternative would be subject to the same mitigation for the protection of previously undiscovered paleontological resources as the proposed project.

**Greenhouse Gas Emissions**: This alternative would generate fewer construction-related GHG emissions since there would be less grading, and fewer operational GHG emissions since there would be fewer new residences and associated vehicle trips. However, the proposed project's greenhouse gas emissions impacts are also less than significant.

Hazards and Hazardous Materials: The impacts associated with the development of this alternative are the same as those associated with the proposed project although this project may have nominally less potential to release hazardous materials during site grading since there would be less grading in the southern golf course area. This alternative would be subject to the same mitigation for the prevention of hazardous materials releases as the proposed project. However, the proposed project's hazards and hazardous materials-related impacts are also less than significant with mitigation.

Hydrology and Water Quality: This alternative would be subject to the same regulations for the control and treatment of water during construction and operation as the proposed project. The new residential development area would be raised above the base flood elevation; thus, ensuring that the new development would not increase flooding hazards. However, the residential development area of this alternative would not provide a flood protection barrier between Conejo Creek and the golf course. This alternative would not include the need for an unobstructed spillway, thus eliminating the one significant and unavoidable impact of the proposed project. In doing so, the existing flood conditions in the Camarillo Springs area would remain and the existing homes south of the project site would not be removed from the 100-year floodplain.

Land Use and Planning: The land use and planning impacts associated with the development of this alternative are similar to those associated with the proposed project. Like the proposed project, this alternative would require approval of a General Plan Amendment and change of zone.

**Noise and Vibration**: This alternative would generate less construction-related noise and vibration levels since there would be less grading in the southern golf course area and less operational noise levels since there would be fewer new residences and associated vehicle trips. However, the proposed project's noise impacts are also less than significant.

**Population and Housing:** This alternative would generate a smaller number of new residents (approximately 300) than the proposed project. However, this alternative would result in the same less than significant impacts to population and housing as the proposed project.

**Public Services and Recreation**: This alternative would generate less demand for public services than the proposed project. Therefore, impacts would be slightly less than the proposed project. However, the proposed project's public services and recreational impacts are also less than significant.

**Transportation**: This alternative would result in similar transportation impacts as the proposed project. While this alternative would generate fewer traffic trips since there would be fewer new residences, vehicle miles traveled per capita would likely be the same, as overall the project would have fewer residents.

**Utilities and Service Systems**: This alternative would generate less demand for public utilities and service systems than the proposed project and, therefore, would have slightly less impact than the proposed project. However, the proposed project's utilities and service systems impacts are also less than significant.

**Wildfire**: In general, the risk to wildfire of the new residential uses under this alternative would be the same as the proposed project. However, the proposed project's wildfire impacts are also less than significant.

Development of the Reduced Intensity Alternative would meet most of the primary objectives for the project. However, this alternative would provide substantially fewer dwelling units than the proposed project and would not meet the following primary objectives:

- Abate existing flood hazards for those current residents living in a special flood hazard zone designated by the Federal Emergency Management Agency.
- Implement comprehensive flood safety infrastructure improvements at no cost to existing residents or the City of Camarillo.

#### **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, No Project Alternative would result in the least impacts on the existing environment. However, where the No Project Alternative is the environmentally superior alternative, CEQA directs agencies to identify a second environmentally superior alternative. Here, the proposed project would result in one

significant and unavoidable environmental impact related to a potential increase in flooding hazards. The No Conejo Creek Flood Protection Alternative, the Reduced Density Alternative, and the Reduced Intensity Alternative would each eliminate the one significant and unavoidable impact. Between these three alternatives, the Reduced Intensity Alternative would involve the least amount of grading and development and, as such, would incrementally reduce the project's other already less than significant impacts even further than the other two alternatives. From a purely environmental perspective, the Reduced Intensity Alternative would be superior to the proposed project.

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