# Veterans Affairs Community-Based Outpatient Clinic

## INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PUBLIC REVIEW DRAFT
SEPTEMBER 2020

CITY OF VENTURA

Prepared For: City of Ventura

Prepared By: Michael Baker International

Michael Baker INTERNATIONAL

**PUBLIC REVIEW DRAFT**
**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

# Veterans Affairs
# Community-Based Outpatient Clinic

**LEAD AGENCY:**


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Ventura, California 93002-009
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September 2020

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# 1.0 INTRODUCTION

The proposed Veterans Affairs Community-Based Outpatient Clinic (herein references as the "project" or "VA CBOC") involves the construction of a one-story (29 feet, four inches tall) community-based outpatient clinic consisting of approximately 51,000 square feet and surface parking on the approximately eight-acre site.

Following a preliminary review of the proposed project, the City of San Buenaventura (City of Ventura) has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

## 1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with Sections 15051 and 15367 of Title 14 the California Code of Regulations (the CEQA Guidelines), the City of Ventura (City) is the CEQA Lead Agency for the proposed project. Under CEQA (Public Resources Code Sections 21000-21177) and pursuant to Section 15063 of the CEQA Guidelines, the City is required to undertake the preparation of an Initial Study to determine if the proposed project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Section 21080(c), Public Resources Code).

The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

The environmental documentation and supporting analysis is subject to a public review period. During this review, public agency comments on the document relative to environmental issues will be addressed to the City. Following review of any comments received, the City will consider these comments as a part of the project's environmental review and include them with the Initial Study documentation for consideration by the City.

## 1.2 PURPOSE

Section 15063 of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

## 1.3 CONSULTATION

As soon as the Lead Agency (in this case, the City) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, in order to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

## 1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at the City located at 501 Poli Street, Ventura, California 93002-009 and on the City's website, as indicated below.

- *City of San Buenaventura 2005 Ventura General Plan* (adopted August 8, 2005), website: https://www.cityofventura.ca.gov/485/General-Plan. The City of San Buenaventura 2005 Ventura General Plan (General Plan) establishes the community's goals, policies and actions and is intended to guide future decision-making in Ventura that reflect the planning objectives of the community. The General Plan has been organized into 10 chapters, which incorporate the State mandated elements. They are as follows:

  *General Plan Chapters:*

  1. Our Natural Community: This chapter covers the mandated Conservation and Open Space elements. Topical areas include open space, hillsides, watersheds, riparian areas, and sensitive plants and animals.

  2. Our Prosperous Community: This chapter covers optional Economic Development element. Topical areas include commercial and industrial growth, economic diversification, job opportunities, and tourism.

  3. Our Well-Planned and Designed Community: This chapter covers the mandated Land Use and Housing elements, as well as the optional Design, and Park and Recreation elements. Topical areas include development patterns, neighborhoods, visual character, urban design, streetscapes, demographics, housing needs, affordability, and constraints on production.

  4. Our Accessible Community: This chapter covers the mandated Circulation element. Topical areas include traffic, street network, parking, transit services, and bike routes.

  5. Our Sustainable Infrastructure: This chapter covers the mandated Land Use element. Topical areas include water supply, wastewater treatment, and drainage.

  6. Our Active Community: This chapter covers the mandated Land Use element and optional Park and Recreation element. Topical areas include park and recreation facilities, and youth and senior programs.

  7. Our Healthy and Safe Community: This chapter covers the mandated Safety, Noise, and Land Use elements. Topical areas include development in hazardous areas, hazardous waste management, seismicity, flood control, water quality, brownfields, noise, police, fire, and air quality.

8. Our Educated Community: This chapter covers the mandated Land Use element. Topical areas include schools and libraries.

9. Our Creative Community: This chapter covers the optional Culture element. Topical areas include arts, events, community programs, and cultural and historic resources.

10. Our Involved Community: This chapter covers the optional Citizen Input element. Topical areas include participation in governance.

- *City of Ventura General Plan* Final Environmental Impact Report (August 2005), website: https://www.cityofventura.ca.gov/485/General-Plan. The *City of Ventura General Plan Final Environmental Impact Report* (General Plan FEIR) analyzes the environmental impacts associated with adoption and implementation of the Ventura General Plan. The General Plan FEIR analyzed six land use scenarios. These scenarios ranged from an "intensification/reuse" only option in which only minimal changes to the City's sphere of influence (SOI) would occur to an option that includes three "expansion areas" that include a total of 1,423 acres currently in agricultural use for possible future development. Additionally, the General Plan FEIR examined six build alternatives.

    - No Project (no further development): This alternative assumes that no further development occurs in the City and environmental conditions do not change.

    - No Project (1989 Comprehensive Plan): This alternative assumes that growth continues under the 1989 Comprehensive Plan.

    - Restricted Growth: This alternative assumes that population growth through 2025 would be limited to an annual average rate of 0.78 percent. This is consistent with the growth rate upon which the Ventura County Air Quality Management Plan (AQMP) and Southern California Association of Governments (SCAG) Regional Transportation Plan were based on at that time.

    - No Important Farmland Conversion: This alternative assumes that no Prime, Statewide Importance, or Unique Farmland is converted.

    - Upper North Avenue District Housing: This alternative assumes that a portion of the residential and nonresidential development assumed to occur in the North Avenue and Western Cañada Larga expansion areas would instead be built in the Upper North Avenue district.

    - Intensification/Reuse and Minor Map Clean-Up: This alternative changes the land use designation for a limited number of properties in Saticoy and West Ventura.

    - All Expansion Areas – This alternative assumes that all five expansion areas are developed with a mix residential and non-residential uses.

  The General Plan FEIR concluded significant and unavoidable impacts regarding aesthetics, farmland, air quality, solid waste, transportation and circulation, costal act consistency, and population growth.

- *City of San Buenaventura Municipal Code* (codified through Ordinance No. 2020-020, enacted June 29, 2020 [Supp. No. 50, Update 1]), website: https://library.municode.com/ca/san_buenaventura/codes/code_of_ordinances. The *City of San Buenaventura Municipal Code* (Municipal Code) consists of regulatory, penal, and administrative ordinances of the City of Ventura. Chapter 24 of the Municipal Code, (Zoning Regulations) implements the General Plan by further clarifying appropriate zoning, as well as establishing development

standards within the City. The Zoning Regulations outlines the regulations and requirements which govern the use, placement, spacing, and size of land and building, as well as defines the designated zoning districts.

# 2.0 PROJECT DESCRIPTION

## 2.1 PROJECT LOCATION

The proposed Veterans Affairs Community-Based Outpatient Clinic (herein referenced the "project" or "VA CBOC") is located in the City of San Buenaventura (City of Ventura), in the southwestern portion of Ventura County; refer to Exhibit 1, *Regional Vicinity*. The approximately eight-acre project site is situated within the southcentral portion of the City, just north of U.S. Highway 101 (U.S. 101) and approximately 0.75 miles south of State Route 126 (SR-126), at 5250 Ralston Street; refer to Exhibit 2, *Site Vicinity*.

## 2.2 ENVIRONMENTAL SETTING

The project site is generally comprised of a vacant industrial/office space, associated surface parking, and ornamental landscaping. Based on historic aerial imagery, prior to the mid-1970s the site was undeveloped and utilized for agricultural purposes. In 1977, the John P. Scripps Newspapers company developed the subject property as an office and printing plant for the *Ventura County Star-Free Press*. The newspaper remained on the property until 2011. The property has remained vacant since 2011.

The existing, centrally located structure is an approximately 44,600-square foot, one- and two-story over basement industrial building. Loading docks and metal garage and freight doors are located at the south and east facades. Several of the windows and entrance doors have been boarded up with plywood. Patio areas are located at the north and east façades. The western and southern portions of the site include large open landscaped areas with ornamental landscaping and mature trees. Surface parking occurs within the northern and northeastern portion of the project site and provides 210 parking spaces. Vehicular access is provided via two driveways from Ralston Street, a single driveway from Saratoga Avenue, and two driveways from Walker Street.

The project site is designated Industry by the *2005 Ventura General Plan* (General Plan). As shown on the City of Ventura, *Zoning District Map*, the project site is zoned Manufacturing Planned Development (MPD).

### 2.2.1 SURROUNDING USES

Land uses adjacent to the project site include the following:

- *North*: North of the project site is Ralston Street. Beyond Ralston Street is the Orchard Lane residential development designated by the General Plan land use diagram as Medium (9-20 dwelling units per acre [du/ac]) and zoned as Residential Planned Development (RPD-18).

- *East*: East of the project site is Saratoga Avenue (adjoining the northeastern portion of the project site) and a Coca-Cola Bottling Company facility (adjoining the southeastern portion). Beyond Saratoga Avenue and north of Everglades Street are commercial uses including the Anacapa Animal Hospital, Firefly Ceramics, and Cory Keyboard Products. The General Plan land use diagram designates these sites as Industry and are zoned MPD.

- *South*. South of the project site is Walker Street. Beyond Walker Street is U.S. 101.

- *West*: West of the project site is Glacier Avenue. Beyond Glacier Avenue is a business park called Walker-Ralston Square, which includes, but is not limited to retail, commercial, and office uses, such as The Floor Store, Mail Manager, Drapery Affair, The Arc of Ventura County, Pump It Up, etc. The General Plan land use diagram designates these sites as Industry and are zoned MPD.


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# Regional Vicinity

**Exhibit 1**


Source: Google Earth Pro, April 2020.

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Project Site

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# Site Vicinity

**Exhibit 2**

## 2.3 BACKGROUND AND HISTORY

In September 2019, Ventura VA, LLC (project developer) was awarded a lease for the new VA CBOC project by the Department of Veterans Affairs. The new clinic would be located at 5250 Ralston Street, in the City of Ventura. As noted above, the site was previously owned by the Ventura County Star Newspaper and currently contains a 44,600 square foot industrial/office facility and associated surface parking. The site has remained vacant for more than nine years and is not adequately serving the surrounding community or the City of Ventura (City). The project proposes to demolish the existing structure on-site and construct a new VA CBOC that would serve as a primary care clinic for the local veteran population within the community and greater Ventura County.

## 2.4 PROJECT CHARACTERISTICS

The project proposes construction of a one-story (29 feet, four inches tall) CBOC consisting of approximately 51,000 square feet of building area and surface parking (339 parking spaces in total) on the approximately eight-acre site; refer to Exhibit 3, *Conceptual Site Plan*. Potential primary care and mental health clinical services to be provided at this facility include counseling, physical therapy, audio and eye care, imaging, lab services, women's health, dental, cardiology and cardiac rehabilitation, primary care, and outpatient procedures, among others. Hours of operation would be 7:00 a.m. to 5:00 p.m., Monday through Friday. It is anticipated that the facility would employ approximately 115 people per shift and shifts would be staggered throughout the day.

The CBOC would include a primary medical office building that would be located in the central portion of the site and surface parking would be located in the northeastern (Parking Area 1), northern (Parking Area 2), and southern (Parking Area 3) portions of the site (refer to the Parking section below for additional detail). A circular travel way with a landscaped island would be provided north of the medical building, separating Parking Area 1 and Parking Area 2 and allowing for patient drop-off and fire access in front of the medical building. Sidewalk with enhanced pavement and landscaping would guide pedestrians from the surface parking areas and local roadways to the medical office building. Bike racks are proposed north and south of the medical building. Each bike rack location would accommodate 16 bicycles (for a total of 32 bicycles).

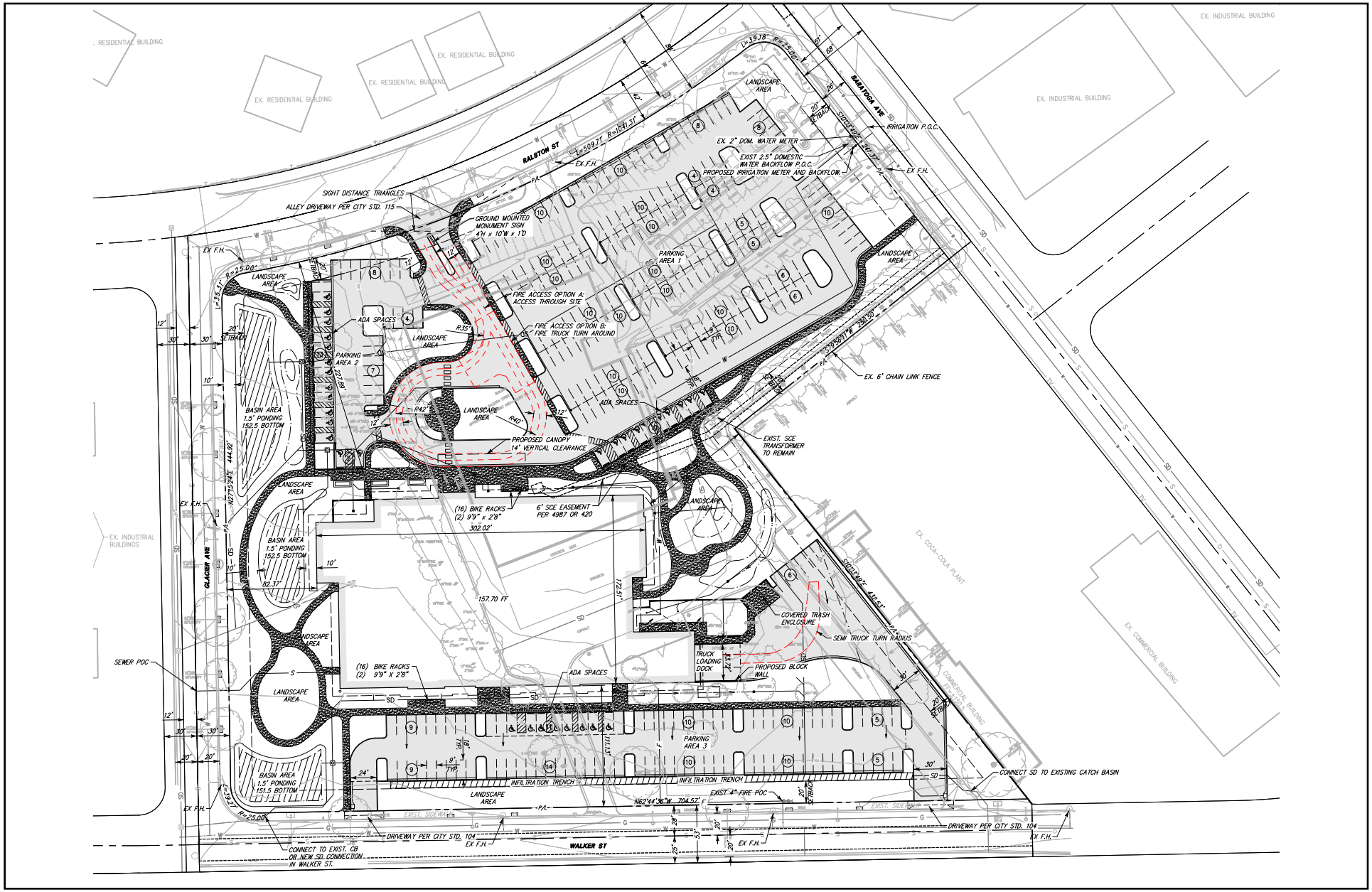
A truck loading dock is proposed at the southeast corner of the medical building. A retaining wall would be installed at the southern boundary of the loading dock. Access to the loading dock would be provided from the eastern most driveway along Walker Street (refer to the Site Access section below for addition detail).

Three infiltration basins would be located within the western portion of the project site, parallel to Glacier Avenue. A linear infiltration trench is proposed along the southern boundary of Parking Area 3.

A monument sign would be installed at the northern driveway median accessed from Ralston Street. Nighttime security lighting is proposed along walkways, within the surface parking areas, at the truck loading dock, and at the building entrances and bike rack locations, among other locations.

Earthwork associated with project construction would include 6,650 cubic yards of cut and 7,500 cubic yards of fill material. Additionally, approximately 93 trees would be removed on-site during construction; however, approximately 38 trees would be preserved in place, which would include Cassia leptophylla, Erythrina sp., Pyrus kawakamii, Pinus pinea, Platanus racemose, and Quercus sp. (refer to the Landscaping section below for additional detail).

The proposed project would be consistent with the General Plan land use and zoning designations for the subject site.

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# Conceptual Site Plan

**Exhibit 3**

**PARKING**

The surface parking would provide 339 total parking spaces, which includes 307 standard spaces and 32 ADA accessible spaces (including six van accessible spaces). The on-site parking is divided into three areas:

- *Parking Area 1*: Parking Area 1 would be located within the northeastern portion of the project site and provides 196 standard spaces and 10 ADA accessible spaces (including 2 van accessible spaces) for a total of 206 parking spaces.

- *Parking Area 2*: Parking Area 2 would be located within the northern portion of the project site and provides 20 standard spaces and 14 ADA accessible spaces (including 2 van accessible spaces) for a total of 34 parking spaces.

- *Parking Area 3*: Parking Area 3 would be located within the southern portion of the project site and provides 91 standard spaces and 8 ADA accessible spaces (including 2 van accessible spaces) for a total of 99 parking spaces.

**SITE ACCESS**

Vehicular access would be provided from Ralston Street via a driveway located between Parking Area 1 and Parking Area 2. In and out travel at this driveway location would be separated by a center median. Additionally, two driveways would occur along Walker Street at the western and eastern boundaries of Parking Area 3.

**ARCHITECTURE**

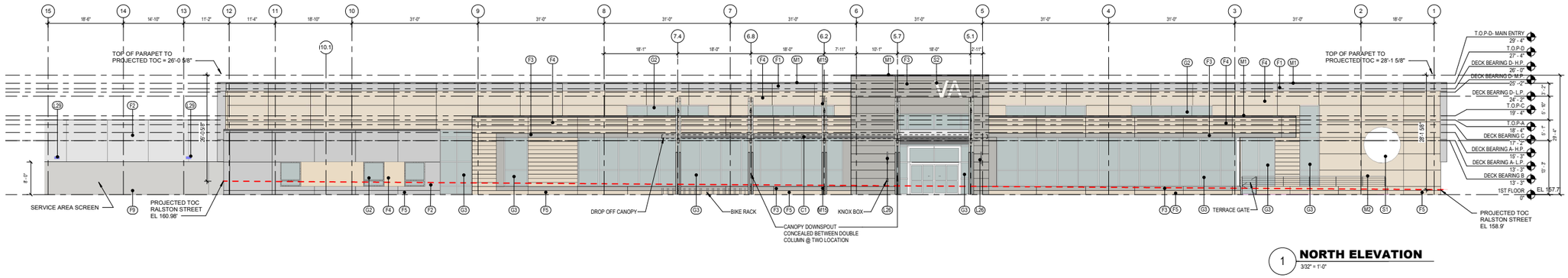
The one-story medical building would be constructed with a maximum height 29 feet, four inches tall; refer to Exhibits 4a and 4b, *Elevations*. Primary building materials would include a steel frame; fiberglass canopy; metal canopy, gutters and downspouts, doors, and railings; aluminum storefront, curtain wall, and coping; stucco finish; and glass windows. Colors would range from metallic, sand, and several variations of greys.

**LANDSCAPING**

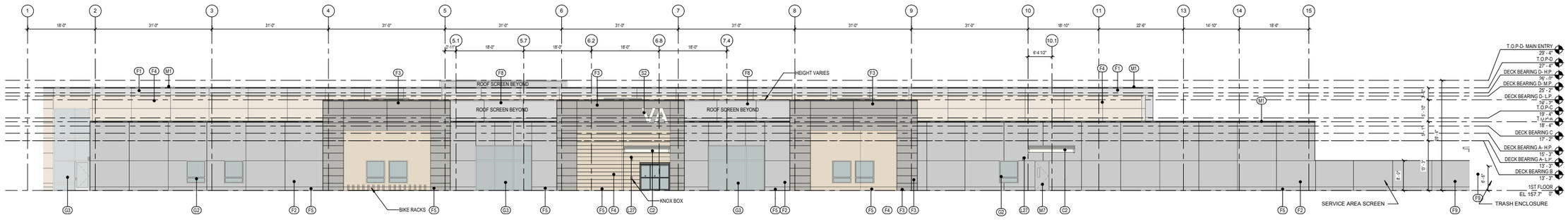
Landscaping would be provided throughout the site including around the perimeter of the medical office building, adjacent to the adjoining roadways and proposed sidewalk, and within surface parking islands and medians. Proposed landscaping would include drought-tolerant shrubs, grasses, and vines, as well as a variety of trees such as Western Sycamore, Tipu trees, queen palm and a variety of other trees; refer to Exhibits 5, *Tree Planting Plan* and Exhibits 6, *Shrub Planting Plan*. Decorative dry streams and native plant gardens are proposed east and west of the structure. The use of groundcover, decomposed granite, boulders, and aluminum edging would also be incorporated into the proposed on-site landscaping.

## 2.5 PROJECT PHASING

The project is expected to be constructed in one phase. Construction is anticipated to occur over a 15-month period, beginning in November 2020 and ending in February 2022




1 **NORTH ELEVATION**
3/32" = 1'-0"




2 **SOUTH ELEVATION**
3/32" = 1'-0"

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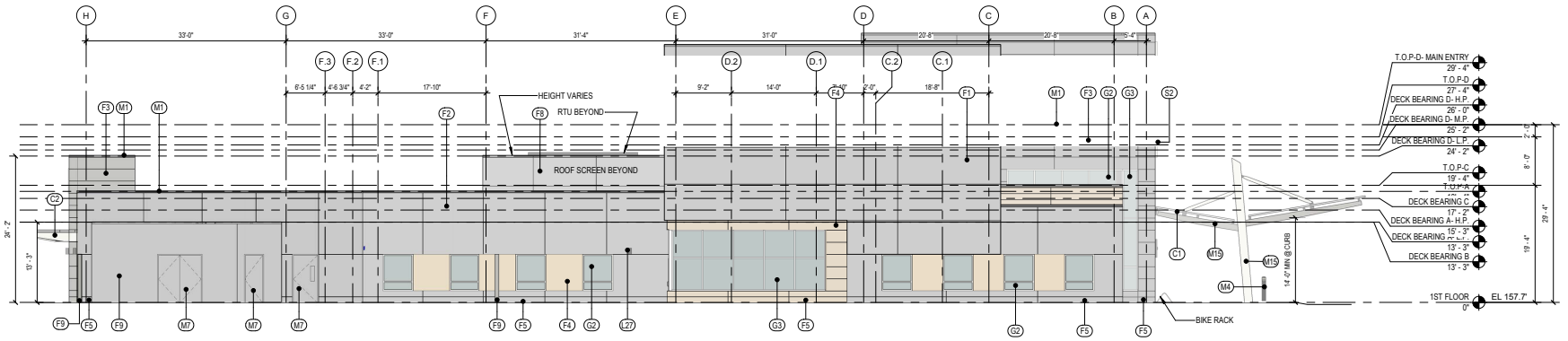
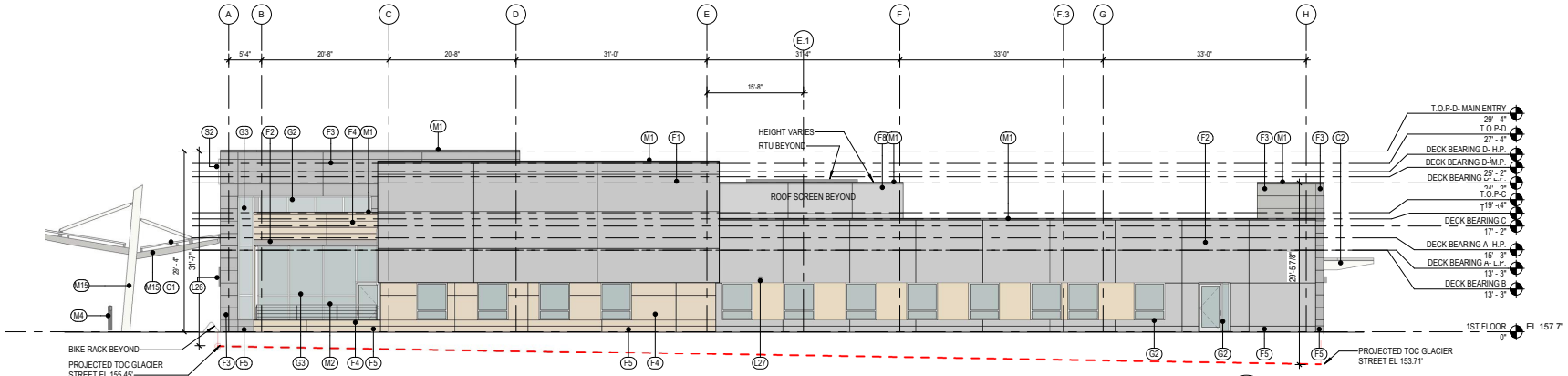
# Elevations

**Exhibit 4a**




3 **EAST ELEVATION**

3/32" = 1'-0"




4 **WEST ELEVATION**

3/32" = 1'-0"

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# Elevations

**Exhibit 4b**

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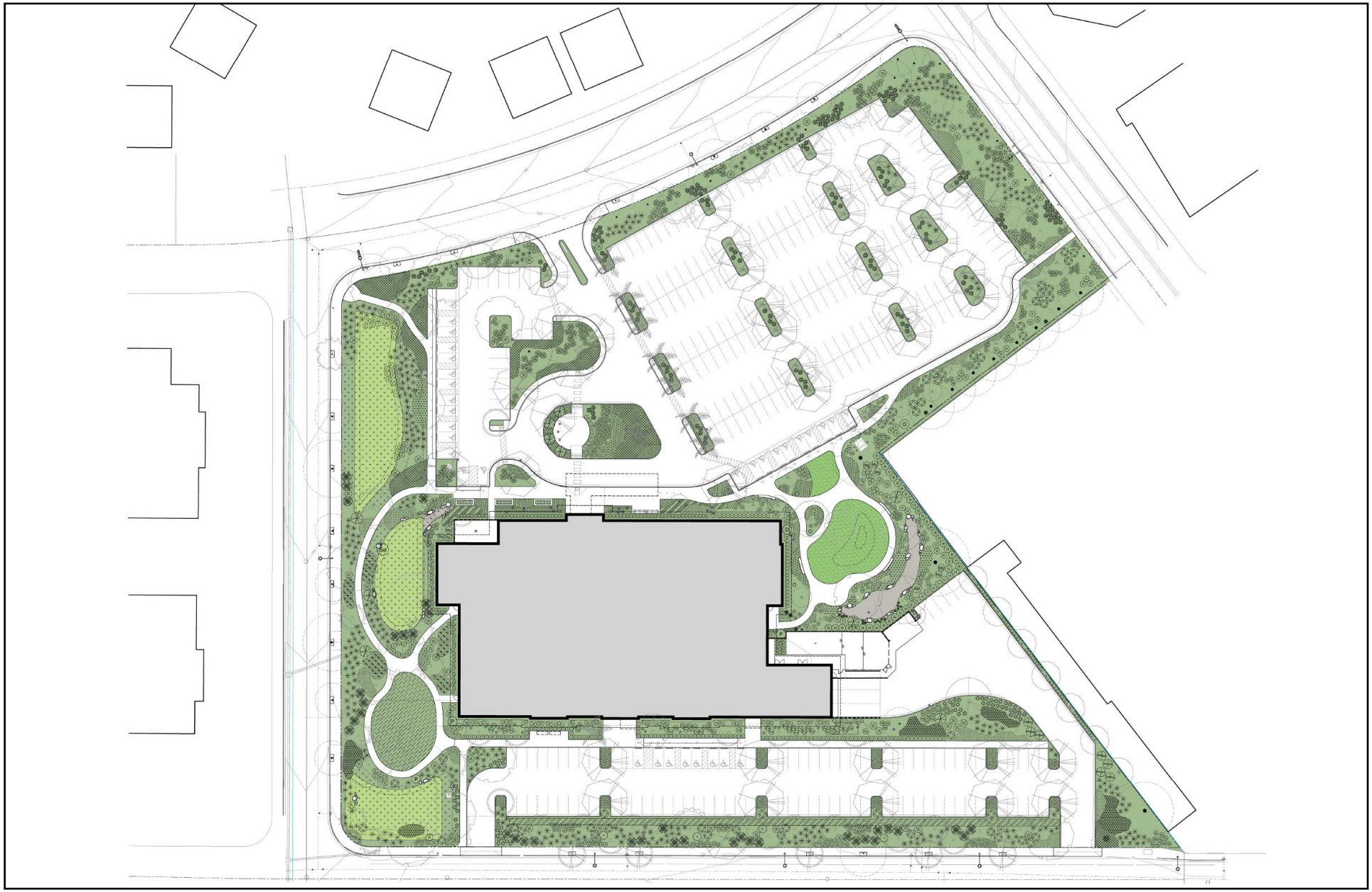
# Tree Planting Plan

**Exhibit 5**



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# Shrub Planting Plan

**Exhibit 6**

## 2.6 AGREEMENTS, PERMITS, AND APPROVALS

The proposed project would require permits and approvals from the City of Ventura and other agencies prior to construction. These permits and approvals are described below, and may change as the project entitlement process proceeds.

City of Ventura

- California Environmental Quality Act (CEQA) review;
- Planned Development Permit;
- Architectural and Design review;
- Grading Permit;
- Building Permit; and
- Certificate of Occupancy.

Regional Water Quality Control Board

- NPDES Construction General Permit

# 3.0 INITIAL STUDY CHECKLIST

## 3.1 BACKGROUND

| | |
|---|---|
| **1.** | **Project Title:** Veterans Affairs Community-Based Outpatient Clinic |
| **2.** | **Lead Agency Name and Address:**<br><br>City of Ventura<br>501 Poli Street,<br>Ventura, California 93002-009 |
| **3.** | **Contact Person and Phone Number:**<br><br>Elizabeth Richardson<br>Senior Planner<br>erichardson@cityofventura.ca.gov |
| **4.** | **Project Location:** The proposed Veterans Affairs Community-Based Outpatient Clinic is located in the City of Ventura, in the southwestern portion of Ventura County. The approximately eight-acre project site is situated within the southcentral portion of the City, just north of U.S. 101 and approximately 0.75 miles south of SR-126, at 5250 Ralston Street. |
| **5.** | **Project Sponsor's Name and Address:**<br><br>City of Ventura<br>501 Poli Street,<br>Ventura, California 93002-009 |
| **6.** | **General Plan Designation:** The project site is designated Industry by the General Plan. |
| **7.** | **Zoning:** As shown on the City of Ventura, *Zoning District Map*, the project site is zoned Manufacturing Planned Development (MPD). |
| **8.** | **Description of the Project:** The project proposes to demolish the existing 44,600 square foot industrial/office facility on-site and construct of a one-story (29 feet, four inches tall) VA CBOC consisting of approximately 51,000 square feet of building area, landscaping, and surface parking (339 parking spaces in total) on the approximately eight-acre site. The new VA CBOC is intended to serve as a primary care clinic for the local veteran population within the community and greater Ventura County. |

**9. Surrounding Land Uses and Setting:**

- North: North of the project site is Ralston Street. Beyond Ralston Street is the Orchard Lane residential development designated by the General Plan land use diagram as Medium (9-20 dwelling units per acre [du/ac]) and zoned as Residential Planned Development (RPD-18).
- East: East of the project site is Saratoga Avenue (adjoining the northeastern portion of the project site) and a Coca-Cola Bottling Company facility (adjoining the southeastern portion). Beyond Saratoga Avenue and north of Everglades Street are commercial uses including the Anacapa Animal Hospital, Firefly Ceramics, and Cory Keyboard Products. The General Plan land use diagram designates these sites as Industry and are zoned MPD.
- South: South of the project site is Walker Street. Beyond Walker Street is U.S. 101.
- West: West of the project site is Glacier Avenue. Beyond Glacier Avenue is a business park called Walker-Ralston Square, which includes, but is not limited to retail, commercial, and office uses, such as The Floor Store, Mail Manager, Drapery Affair, The Arc of Ventura County, Pump It Up, etc. The General Plan land use diagram designates these sites as Industry and are zoned MPD.

**10. Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement).**

Refer to Section 2.6, *Agreements, Permits, and Approvals*, for a description of the range of local, regional, and State approvals anticipated to be required for the project. Additional approvals may be required as the project entitlement process moves forward.

## 3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact With Mitigation Incorporated," as indicated by the checklist on the following pages.

| | | | |
|---|---|---|---|
| ✓ | Aesthetics | | Mineral Resources |
| | Agriculture and Forestry Resources | | Noise |
| ✓ | Air Quality | | Population and Housing |
| ✓ | Biological Resources | | Public Services |
| ✓ | Cultural Resources | | Recreation |
| | Energy | ✓ | Transportation/Traffic |
| ✓ | Geology and Soils | ✓ | Tribal Cultural Resources |
| | Greenhouse Gas Emissions | | Utilities & Service Systems |
| ✓ | Hazards & Hazardous Materials | | Wildfire |
| | Hydrology & Water Quality | ✓ | Mandatory Findings of Significance |
| | Land Use and Planning | | |

## 3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the *CEQA Guidelines* and used by the City in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- *No Impact*. The development will not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.

- *Less Than Significant Impact With Mitigation Incorporated*. The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- *Potentially Significant Impact*. The development will have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

# 4.0 ENVIRONMENTAL ANALYSIS

The following is a discussion of potential project impacts as identified in the Initial Study/Environmental Checklist. Explanations are provided for each item.

## 4.1 AESTHETICS

| *Except as provided in Public Resources Code Section 21099, would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Have a substantial adverse effect on a scenic vista? | | ✓ | | |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | | | ✓ | |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | | ✓ | | |
| d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | | ✓ | | |

### *a) Have a substantial adverse effect on a scenic vista?*

***Less Than Significant Impact With Mitigation Incorporated.*** Based on the General Plan FEIR, the project site is not located near a designated scenic corridor, district, or neighborhood center with aesthetic value. The project site is generally flat, developed, and surrounded by residential, industrial, commercial, and transportation uses. There are no mapped or indicated scenic vistas adjacent to or within the vicinity of the site. Although the U.S. 101 is identified as a local scenic highway route within the General Plan, it is not designated as a State Scenic Highway. Views along U.S. 101 near the project site generally include improved right-of-way, landscaping, and one-story developments.

**Short-Term Impacts**

Development of the proposed project would demolish the existing vacant building and construct a new VA CBOC building on-site. During short-term construction phase of the proposed project, construction activities would temporarily disrupt views within the project area. Although these activities would be temporary in nature and would cease upon completion of construction, these activities and associated equipment would be exposed to surrounding uses, motorists, pedestrians, and bicyclists. Mitigation Measure AES-1 would require that construction staging areas be sited as far away from nearby sensitive viewers as feasible, and that opaque screening material be used to shield public views toward the site throughout the construction process. With implementation of the recommended Mitigation Measure AES-1, views of the site and surroundings would not be substantially degraded during short-term project construction and impacts in this regard would be reduced to less than significant levels.

**Long-Term Impacts**

Operationally, the new one-story building would generally be of similar height to the existing condition. The site plan design would complement structures that presently exist in the project vicinity, including the proposed building materials, massing, and scale; refer to Exhibit 4.1-1, *Site Rendering*. The project would be subject to architectural and design review by the City, to ensure adverse effects do not occur. Post-construction views would be similar in character to current views and would continue to meet viewer expectations from all perspectives. Thus, impacts would be less than significant in this regard.

***Mitigation Measures:***

AES-1 Construction equipment staging areas shall be located, to the greatest extent feasible, away from nearby existing sensitive viewers (e.g., resident, pedestrians/bicyclists, and motorists), and shall utilize appropriate screening (i.e., temporary fencing with opaque material) to shield public views of construction equipment and material. Prior to issuance of a grading permit, the City of Ventura shall verify that staging locations are identified on final grading/development plans and that appropriate perimeter screening is included as a construction specification.

***b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

***Less Than Significant Impact.*** While U.S. 101 is eligible as a state scenic highway, it has not been designated as such. Implementation of the proposed project would include grading and excavation that would require removal of existing vegetation, including mature trees. Approximately 93 trees would be removed on-site during construction; however, approximately 38 trees would be preserved in place. Although tree removal may result in an alteration in the aesthetic character on-site, impacts in this regard would not be substantial as tree removal, preservation, and replacement plantings would be conducted in accordance to the City's Tree Protection Plan. No historic buildings occur within the viewshed of the project site; refer to Section 4.5, *Cultural Resources*. Impacts would be less than significant in this regard.

***Mitigation Measures:*** No mitigation is required.

***c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

***Less Than Significant Impact With Mitigation Incorporated.*** The project site is located within an urbanized area of the southcentral portion of the City. Existing views are mainly comprised of the unmaintained landscaping, mature trees, and a vacant building with associated surface parking. The topography of the site is generally flat.

**Short-Term Impacts**

As noted above in response 4.1(a), short-term construction activities associated with the proposed project would temporarily impact the character/quality of the project site. Although views towards the project site may be temporarily altered by ground disturbance, construction equipment, and supplies/stockpiles, these potential impacts would be short-term in nature and would cease upon completion of the construction phase. Additionally, Mitigation Measure AES-1 would require that construction staging areas be sited as far away from nearby sensitive viewers as feasible, and that opaque screening material be used to shield public views toward the site throughout the construction process. With implementation of Mitigation Measure AES-1, impacts would be reduced to less than significant levels.

**Long-Term Impacts**

On a long-term operational basis, a project is generally considered to have a significant visual/aesthetic impact if it substantially changes the character of the project site such that it becomes visually incompatible or visually unexpected when viewed in the context of its surroundings, resulting in degradation of the existing visual character or quality of the site and its surroundings. As noted above in Response 4.1(a), the proposed project would include demolition of the vacant building and construction of a new VA CBOC. The new development would encompass 51,000 square feet of building area and 339 surface parking spaces on the approximately eight-acre site. The building height (29 feet, four inches tall), massing, and scale would be similar to the existing and surrounding surrounding development.

The project would install new landscaping on-site, including new trees and shrubs around perimeter of the medical office building, adjacent to the adjoining roadways and proposed sidewalk, and within surface parking islands and medians; refer to Exhibits 5 and 6. Decorative dry streams and native plant gardens are proposed east and west of the structure. The use of groundcover, decomposed granite, boulders, and aluminum edging would also be incorporated into the proposed on-site landscaping.

The proposed project would be consistent with the existing zoning as well as the character of the surrounding area. The project would be subject to architectural and design review by the City, to ensure adverse effects do not occur. As such, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. Less than significant impacts would occur in this regard.

***Mitigation Measures:*** Refer to Mitigation Measures AES-1.

***d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

***Less Than Significant Impact With Mitigation Incorporated.*** There are two primary sources of light: light emanating from building interiors that pass through windows and light from exterior sources (i.e., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). Depending upon the location of the light source and its proximity to adjacent light sensitive uses, light introduction can be a nuisance, affecting adjacent areas and diminishing the view of the clear night sky.

The proposed project is located within an urbanized area of the City of Ventura. Currently, light is being emitted from the existing street lighting provided along the local roadways surrounding the site. The land uses surrounding the project site are urbanized and contain various sources of light and glare as well. Specifically, light and glare in the area is generated from the light emanating from building interiors and light from exterior sources (i.e., building illumination, parking lot lighting, and security lighting) associated with adjacent industrial, business, and residential land uses, as well as transportation related sources (i.e., traffic and vehicular lights).

Pursuant to the Municipal Code, all construction activities may only occur between the hours of 7:00 AM and 8:00 PM since the project site is adjacent to residential uses. Thus, as required by the Municipal Code, no nighttime construction activities would occur. During operations of the project, nighttime security lighting and parking lot lighting would be similar to existing conditions. The VA CBOC would be operational from 7:00 a.m. to 5:00 p.m., Monday through Friday, and vehicle headlights along project driveways would be minimal. Pursuant to the Municipal Code, Section 24.415.110, Lighting, exterior parking areas shall be designed to confine lighting to the parking area on-site such that there is no lighting splash beyond the site. In order to ensure that proposed lighting does not spill over onto off-site uses, including adjacent residential uses, lighting would be required to be focused and fixtures would be shielded to contain lighting on-site (Mitigation Measure AES-2). Proposed building materials is anticipated to be similar in character to the existing buildings on-site and in the area for daytime glare. The use of highly reflective glass, potentially resulting in daytime glare impacts is not permitted. Therefore, with adherence to the Municipal Code development standards and Mitigation Measure AES-2, impacts in this regard would be less than significant.

***Mitigation Measures:***

AES-2 The project applicant shall ensure that any exterior lighting does not spill over onto any adjacent properties. Prior to issuance of any building permit, the project applicant shall prepare and submit an Outdoor Lighting Plan to the City of Ventura, for review and approval, that includes a footcandle map illustrating the amount of light from the proposed project at adjacent light sensitive receptors. All exterior light fixtures shall be shielded or directed away from adjoining uses.

# 4.2 AGRICULTURE AND FORESTRY RESOURCES

| ***In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*** | **Potentially Significant Impact** | **Less Than Significant Impact With Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | | ✓ |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | ✓ |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | | | | ✓ |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | | | | ✓ |
| e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | ✓ |

***a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

***No Impact.*** The proposed project would demolish an existing vacant industrial building and construct a new VA CBOC. The majority of the project area is characterized by "Urban" and "Built-Up Land," as identified by the California Department of Conservation's Farmland Mapping and Monitoring Program.[1] As such, project implementation would have no impact on Prime, Unique, or Farmland of Statewide Importance. No impacts would occur in this regard.

***Mitigation Measures*:** No mitigation is required.

[1] California Department of Conservation Farmland Mapping and Monitoring Program, *Ventura County Important Farmland 2016*, accessed April 2, 2020.

***b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?***

***No Impact.*** Refer to Response 4.2(a), above. The subject site is zoned Manufacturing Planned Development (MPD). No agricultural zoning designation exists on-site or within the project vicinity. In addition, according to the Ventura County GIS online mapping tool, the project site is not located on or within the vicinity of land protected under the Williamson Act.[2] No impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

***No Impact.*** Refer to Responses 4.2(a) and 4.2(b), above. No zoning for forest land, timberland, or timberland production exists within the project area, and no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***d) Result in the loss of forest land or conversion of forest land to non-forest use?***

***No Impact.*** Refer to Responses 4.2(a) through 4.2(c), above. No forest land exists within the project area, and no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

***No Impact.*** Refer to Responses 4.2(a) through 4.2(d), above. No farmland or forest land exists within the project area, and no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

[2] County of Ventura Information Technology Services Department GIS Mapping website, https://www.ventura.org/gis-and-mapping/maps/#, accessed on April 3, 2020.

# 4.3 AIR QUALITY

| ***Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:*** | **Potentially Significant Impact** | **Less Than Significant Impact With Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | | | ✓ | |
| b. 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? | | ✓ | | |
| c. Expose sensitive receptors to substantial pollutant concentrations? | | | ✓ | |
| d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)? | | | ✓ | |

### *a) Conflict with or obstruct implementation of the applicable air quality plan?*

***Less Than Significant Impact.*** The proposed project is located within the South Central Coast Air Basin (Basin), which is governed by the Ventura County Air Pollution Control District (VCAPCD). Consistency with the *2016 Ventura County Air Quality Management Plan* (2016 AQMP) means that a project is consistent with the goals, objectives, and assumptions set forth in the 2016 AQMP that are designed to achieve Federal and State air quality standards. The 2016 AQMP was adopted by the VCAPCD Air Pollution Control Board on February 14, 2017 and incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Southern California Association of Governments' (SCAG's) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS), and updated emission inventory methodologies for various source categories. According to VCAPCD's *Ventura County Air Quality Assessment Guidelines* (dated October 2003), project consistency with the 2016 AQMP can be determined by comparing the actual population growth in the County of Ventura (County) with the projected growth rates used in the 2016 AQMP. The projected growth rate in population is used as an indicator of future emissions from population-related emission categories in the 2016 AQMP. These emission estimates are used, in part, to project the date by which the County will attain the federal ozone standard. The County's Planning Division maintains an ongoing population tracking system. Therefore, a demonstration of consistency with the population forecasts used in the most recently adopted 2016 AQMP should be used for assessing project consistency with the 2016 AQMP.

The project would construct a one-story clinic building consisting of approximately 51,000 square feet of building area. The project does not include the removal or addition of residences and population forecasts would not be altered by the project. As discussed in Section 4.14, *Population and Housing*, even though the employment created by the proposed project has the potential to result in an indirect growth in the City of San Buenaventura's (City) population, project implementation is not anticipated to induce substantial population growth within the City either directly or indirectly. As such, the project would not increase population figures over those that have been planned for the area and would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. In addition, the proposed project would be consistent with the City's General Plan land use and zoning designations for the subject site and would not require a General Plan Amendment. Therefore, the proposed project is considered consistent with the VCAPCD's 2016 AQMP, and the impact would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***b) 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?***

***Less Than Significant Impact With Mitigation Incorporated.***

**CRITERIA POLLUTANTS**

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of carbon monoxide.

Ozone ($O_3$). $O_3$ occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" $O_3$ layer) extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays. "Bad" $O_3$ is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen oxides ($NO_X$), and sunlight to form; therefore, VOCs and $NO_X$ are $O_3$ precursors. To reduce $O_3$ concentrations, it is necessary to control the emissions of these $O_3$ precursors. Significant $O_3$ formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High $O_3$ concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While $O_3$ in the upper atmosphere (stratosphere) protects the earth from harmful ultraviolet radiation, high concentrations of ground-level $O_3$ (in the troposphere) can adversely affect the human respiratory system and other tissues. $O_3$ is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of $O_3$. Short-term exposure (lasting for a few hours) to $O_3$ at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide ($NO_2$). $NO_2$ (often used interchangeably with $NO_X$) is a reddish-brown gas that can cause breathing difficulties at elevated levels. $NO_X$ are a family of highly reactive gases that are a primary precursor to the formation of ground-level $O_3$ and react in the atmosphere to form acid rain. Peak readings of $NO_2$ occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). $NO_2$ can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to $NO_2$ concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to $NO_2$ may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter ($PM_{10}$). $PM_{10}$ refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. $PM_{10}$ arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. $PM_{10}$ scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both State and Federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new $PM_{2.5}$ standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a Final Rule in the Federal Register that designates the Basin as a nonattainment area for Federal $PM_{2.5}$ standards. On June 20, 2002, CARB adopted amendments for Statewide annual ambient particulate matter air quality standards. These standards were revised/established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the Statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Sulfur Dioxide ($SO_2$). $SO_2$ is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with sulfur oxides ($SO_X$). Exposure of a few minutes to low levels of $SO_2$ can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOC's are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form $O_3$ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include: CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to $O_3$, which is a criteria pollutant. The VCAPCD uses the terms VOC and ROG (see below) interchangeably.

Reactive Organic Gases (ROG). Similar to VOC, ROG are also precursors in forming $O_3$ and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and $NO_X$ react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to $O_3$, which is a criteria pollutant. The VCAPCD uses the terms ROG and VOC interchangeably.

**SHORT-TERM (CONSTRUCTION) EMISSIONS**

Primary components of the construction process would involve demolition, grading, building construction, paving, and architectural coating. Construction of the proposed project is anticipated to commence in November 2020 and last for approximately 15 months, ending in February 2022. Construction activities would require approximately 850 cubic yards of soil to be imported on-site.

Table 4.3-1, *Construction Air Emissions*, presents the anticipated daily unmitigated and mitigated short-term construction emissions. Emitted pollutants would include ROG, $NO_X$, CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$. Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for the CalEEMod outputs and results.

**Table 4.3-1**
**Construction Air Emissions**

| Emissions Source | Pollutant (pounds/day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| **Unmitigated Construction Emissions[2]** | | | | | | |
| Year 1 | 2.23 | 29.01 | 17.34 | 0.07 | 7.15 | 1.81 |
| Year 2 | 12.35 | 18.22 | 12.32 | 0.03 | 1.54 | 0.83 |
| ***Maximum Daily Emissions*** | **12.35** | **29.01** | **17.34** | **0.07** | **7.15** | **1.81** |
| *VCAPCD Thresholds[3]* | *25* | *25* | *N/A* | *N/A* | *N/A* | *N/A* |
| ***Is Threshold Exceeded Before Mitigation?*** | ***No*** | ***Yes*** | ***N/A*** | ***N/A*** | ***N/A*** | ***N/A*** |
| **Mitigated Construction Emissions[4]** | | | | | | |
| Year 1 | 0.98 | 20.45 | 19.28 | 0.07 | 6.58 | 1.25 |
| Year 2 | 11.84 | 4.75 | 15.47 | 0.03 | 0.96 | 0.28 |
| ***Maximum Daily Emissions*** | **11.84** | **20.45** | **19.28** | **0.07** | **6.58** | **1.25** |
| *VCAPCD Thresholds[3]* | *25* | *25* | *N/A* | *N/A* | *N/A* | *N/A* |
| ***Is Threshold Exceeded After Mitigation?*** | ***No*** | ***No*** | ***N/A*** | ***N/A*** | ***N/A*** | ***N/A*** |

Notes: ROG = reactive organic gas; $NO_x$ = nitrous oxide; CO = carbon monoxide; $SO_2$ = sulfur dioxide; $PM_{10}$ = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; N/A = Not Applicable; VCAPCD = Ventura County Air Pollution Control District

1. Emissions were calculated using CalEEMod, version 2016.3.2. Winter emissions represent worst-case.
2. Unmitigated modeling assumptions include compliance with VCAPCD Rule 55 which requires: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; and limit speeds on unpaved roads to 15 miles per hour; and VCAPCD Rule 74.2 which requires low ROG paints not exceeding 100 grams ROG per liter.
3. VCAPCD has not established thresholds for CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$. Emissions are presented for reporting purposes.
4. Mitigated construction emissions include implementation of Mitigation Measure AIR-1. Mitigation Measure AIR-1 would require that all off-road diesel-fueled construction vehicles and equipment greater than 50 horsepower meet Tier 4 emissions standards during the demolition and grading phases of construction. The mitigated emissions results in this table represent the "mitigated" emissions shown in the CalEEMod output sheets titled "VA Medical Facility Mitigated" in Appendix A.

Source: Refer to Appendix A for detailed model input/output data.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (typically during demolition and construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, excavation and construction is expected to be short-term and would cease upon project completion. These short-term impacts, however, would not be significant for the reasons discussed below.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of $PM_{10}$ generated as a part of fugitive dust emissions. $PM_{10}$ poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as $NO_X$ and $SO_X$ combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

The project would implement all required VCAPCD dust control techniques (i.e., daily watering) and adhere to VCAPCD Rule 55 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce $PM_{10}$ and $PM_{2.5}$ concentrations. VCAPCD has not established thresholds for $PM_{10}$ and $PM_{2.5}$. Total $PM_{10}$ and $PM_{2.5}$ emissions during construction are provided in Table 4.3-1 for reporting purposes.

Construction Exhaust Emissions

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. As presented in Table 4.3-1, unmitigated construction exhaust emissions would exceed the emissions threshold for $NO_X$. The $NO_X$ emission exceedances are predominantly attributed to the use of construction equipment during the demolition and grading phases of construction which represent the most intensive phases of construction. Therefore, Mitigation Measure AIR-1 is applied and mitigated construction emissions accounting for Mitigation Measure AIR-1 are summarized in Table 4.3-1. Mitigation Measure AIR-1 would require that all off-road diesel-fueled construction vehicles and equipment greater than 50 horsepower meet Tier 4 emissions standards during the demolition and grading phases of construction. Tier 4 standards regulate the amount of $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$ emissions from nonroad (or off-road) diesel engines and require emissions of $NO_X$, $PM_{10}$, and $PM_{2.5}$ to be reduced by 90 percent from Tier 1-3 standards. As shown in Table 4.3-1, construction exhaust emissions would not exceed VCAPCD threshold for $NO_X$ with implementation of Mitigation Measure AIR-1. Therefore, impacts would be less than significant with mitigation incorporated.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are $O_3$ precursors. As presented in Table 4.3-1, ROG emissions would not exceed the VCAPCD threshold. The project would comply with VCAPCD Rule 74.2 which requires paints used not exceeding 100 grams of ROG per liter. Therefore, impacts would be less than significant.

Total Daily Construction Emissions

As indicated in Table 4.3-1, criteria pollutant emissions during construction of the proposed project would not exceed the VCAPCD significance thresholds with implementation of Mitigation Measure AIR-1. Thus, total construction related air emissions would be less than significant with mitigation incorporated.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report* (August 2000), serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

## LONG-TERM (OPERATIONAL) EMISSIONS

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. The existing on-site structure is currently vacant, and therefore is not analyzed. Emissions from each source are discussed in more detail below.

Mobile Source

The project-generated vehicle emissions have been estimated using CalEEMod as well as the CARB's EMission FACtor Model 2017 (EMFAC2017). According to the *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020), the proposed project would generate a net increase of 1,576 daily trips. Table 4.3-2, *Long-Term Air Emissions*, presents the anticipated mobile source emissions.

Area Source Emissions

Area source emissions include those generated by architectural coatings, consumer products, and landscape maintenance equipment associated with the development of the proposed project; refer to Table 4.3-2.

Energy Source Emissions

Energy source emissions would be generated as a result of natural gas usage associated with the proposed project; refer to Table 4.3-2. The primary use of natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, and appliances.

Total Operational Emissions

As shown in Table 4.3-2, the total operational emissions for both summer and winter would not exceed established VCAPCD thresholds. Therefore, impacts in this regard would be less than significant.

**Table 4.3-2**
**Long-Term Air Emissions**

| Scenario | Emissions (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| **Proposed Project Summer Emissions** | | | | | | |
| Area Source | 1.48 | <0.01 | 0.04 | 0.00 | <0.01 | <0.01 |
| Energy Source[3] | 0.01 | 0.09 | 0.07 | <0.01 | 0.01 | 0.01 |
| Mobile[4] | 3.88 | 5.51 | 26.55 | 0.07 | 6.61 | 1.83 |
| ***Total Emissions***[2] | **5.37** | **5.60** | **26.66** | **0.07** | **6.62** | **1.83** |
| *VCAPCD Regional Threshold*[5] | *25* | *25* | *N/A* | *N/A* | *N/A* | *N/A* |
| **Threshold Exceeded?** | ***No*** | ***No*** | ***N/A*** | ***N/A*** | ***N/A*** | ***N/A*** |

**Table 4.3-2 [Continued]**
**Long-Term Air Emissions**

| Scenario | Emissions (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_x$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| **Proposed Project Winter Emissions** | | | | | | |
| Area Source | 1.48 | <0.01 | 0.04 | 0.00 | <0.01 | <0.01 |
| Energy Source[3] | 0.01 | 0.09 | 0.07 | <0.01 | 0.01 | 0.01 |
| Mobile[4] | 4.05 | 5.98 | 27.79 | 0.07 | 6.61 | 1.83 |
| ***Total Emissions***[2] | **5.54** | **6.07** | **27.90** | **0.07** | **6.62** | **1.83** |
| *VCAPCD Regional Threshold*[5] | *25* | *25* | *N/A* | *N/A* | *N/A* | *N/A* |
| **Threshold Exceeded?** | ***No*** | ***No*** | ***N/A*** | ***N/A*** | ***N/A*** | ***N/A*** |

Notes: ROG = reactive organic gas; $NO_x$ = nitrous oxide; CO = carbon monoxide; $SO_2$ = sulfur dioxide; $PM_{10}$ = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; N/A = Not Applicable; VCAPCD = Ventura County Air Pollution Control District

1. Emissions were calculated using CalEEMod version 2016.3.2 and the California Air Resources Board EMission FACtor model 2017 (EMFAC2017).
2. The numbers may be slightly off due to rounding.
3. Exceeding Title 24 by 30 percent was applied in CalEEMod to account for the latest 2019 Title 24 Standards. CalEEMod default energy efficiency are based on 2016 Title 24 Standards, and 2019 Title 24 Standards are 30 percent more efficient for nonresidential buildings.
4. Mobile source includes reductions from current General Plan land use trips according to Traffic Impact Analysis.
5. VCAPCD has not established thresholds for CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$. Emissions are presented for reporting purposes.

Refer to Appendix A for assumptions used in this analysis.

## AIR QUALITY HEALTH IMPACTS

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age and gender]). In particular, $O_3$ precursors, VOCs and $NO_X$, affect air quality on a regional scale. Health effects related to $O_3$ are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD) (April 6, 2015) for the *Sierra Club vs. County of Fresno*, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for the *Sierra Club vs. County of Fresno*, SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from $O_3$, as an example is correlated with the increases in ambient level of $O_3$ in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient $O_3$ levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of $NO_X$ and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce $O_3$ levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify $O_3$-related health impacts caused by $NO_X$ or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and

regional model limitations. Thus, as the project would not exceed VCAPCD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

**CONCLUSION**

As summarized above, the project's short-term construction emissions would be below the VCAPCD thresholds and would result in a less than significant impact with mitigation measure incorporated. Furthermore, the project would not result in significant long-term air quality impacts, as emissions would be below the VCAPCD thresholds. Thus, the project's construction and operational emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. Impacts would be less than significant with mitigation incorporated.

***Mitigation Measure:***

AIR-1 All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards during demolition and grading phases of construction. In addition, all construction equipment shall be outfitted with best available control technologies (BACT) devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or Ventura County Air Pollution Control District (VCAPCD) operating permit shall be provided to the City of Ventura at the time of mobilization of each applicable unit of equipment.

***c) Expose sensitive receptors to substantial pollutant concentrations?***

***Less Than Significant Impact.*** Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Sensitive receptors closest to the project site are multi-family residential development located approximately 100 feet to the north of the project site across Ralston Street.

**CARBON MONOXIDE HOTSPOTS**

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). The VCAPCD requires a quantified assessment of CO hotspots when a project would generate indirect emissions greater than the applicable ozone project significance thresholds (25 pounds per day of $NO_X$ and ROG), and may significantly impact roadway intersections that are currently operating at, or are expected to operate at, Levels of Service (LOS) E or F. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

As shown in Table 4.3-2, long-term air emissions would not exceed the VCAPCD significance thresholds for $NO_X$ and ROG. In addition, according to the Traffic Impact Analysis, none of the analyzed intersections would operate at LOS E or F under existing or future conditions, and the low volume of traffic (a maximum of 1,576 average daily trips, including 124 trips during the a.m. peak hour and 140 trips during the p.m. peak hour) generated as a result of project implementation would not significantly impact analyzed roadway intersections. Therefore, according to the VCAPCD

guidelines, the project is not qualified for a quantified assessment of CO hotspots. Less than significant impacts would result in this regard.

**LOCALIZED AIR QUALITY HEALTH IMPACTS**

***Construction***

The project construction activities are anticipated to involve the operation of diesel-powered equipment, which would emit Diesel Particulate Matter (DPM). In 1998, the CARB identified diesel exhaust as a Toxic Air Contaminant (TAC). Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed. The project would construct a clinic building in 13 months while complying with the California Code of Regulations (CCR), Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. In addition, the project would implement Mitigation Measure AIR-1 that would reduce construction exhaust emissions. Implementation of these regulations and measures would reduce the amount of DPM emissions from the construction of the project.

The closest sensitive receptors to the project site are multi-family residential development located approximately 100 feet to the north of the project site across Ralston Street. However, health impacts on sensitive receptors associated with exposure to DPM from project construction are anticipated to be less than significant because construction activities are expected to occur well below the 30-year exposure period used in health risk assessments and would comply with required regulations and Mitigation Measure AIR-1. Additionally, emissions would be short-term and intermittent in nature, and therefore would not generate TAC emissions at high enough exposure concentrations to represent a health hazard. Therefore, construction of the proposed project is not anticipated to result in an elevated cancer risk to nearby sensitive receptors and the impact would be less than significant.

***Operations***

The project would construct a one-story clinic building and would result in very limited operation activities with potential health risks, including landscaping maintenance operations and emergency generators when required. Any on-site emergency generators would be required to comply with VCAPCD rules and regulations, as well as permitting process. Neither of these activities would result in the generation of excessive TAC emissions, or associated health risks from the project's operation. Therefore, operation of the proposed project is not anticipated to result in an elevated cancer risk to nearby sensitive receptors and the impact would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?***

***Less Than Significant Impact.*** According to VCAPCD's *Ventura County Air Quality Assessment Guidelines*, land uses associated with odor complaints typically include wastewater treatment plants, landfills, composting, chemical plants, fiberglass operations, food processing facilities, dairies, rendering plants, refineries, and agricultural uses. The proposed project involves construction of a clinic building and does not include any uses identified by the VCAPCD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the CCR, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. In addition, compliance with VCAPCD Rule 74.2 which requires VOC content of paints not exceeding 100 grams per

liter would reduce the odors from architectural coatings of the project. Any project odor impacts to the existing adjacent land uses and the closest nearby sensitive receptors (residences located 100 feet to the north) would be short-term and not substantial as these odors would quickly dissipate. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

***Mitigation Measures:*** No mitigation is required.

# 4.4 BIOLOGICAL RESOURCES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | ✓ | | |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | ✓ |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | | ✓ |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | | | ✓ | |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | | ✓ |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | | ✓ |

The analysis of biological resources is based upon the *Biological Resources Assessment* prepared for the project by Rincon Consultants, Inc., dated May 24, 2019 (refer to Appendix B, *Biological Resources Assessment*):

***a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

***Less Than Significant Impact With Mitigation Incorporated.*** Special-status plant and wildlife species were evaluated for their potential to occur within the project boundaries based on habitat requirements, availability and quality of suitable habitat, and known distributions. Based on the *Biological Resources Assessment*, 45 special-status plant species, 28 special-status wildlife species were evaluated for potential to occur within the Biological Study Area (BSA). However, based on the results of the literature review and the May 21, 2019 field survey, the special-status species identified during the literature review either have a low potential to occur or are not expected to occur on-site based on existing site conditions and a review of specific habitat requirements, occurrence records, and known distributions. No special-status species, locally important species, or communities were observed during the field survey.

The proposed project would result in the removal of ornamental vegetation and mature trees on-site. Thus, the project could result in potential impacts to nesting birds protected by the Migratory Bird Treaty Act (MBTA). The MBTA prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird. The proposed project has the potential to impact nesting birds if construction activities occur during the nesting season. Mitigation Measure BIO-1 has been provided to reduce impacts in this regard to less than significant levels.

***Mitigation Measures:***

BIO-1 To avoid disturbance of nesting and special-status birds, including raptor species protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), activities related to the project including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 30), if feasible. If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in Southern California coastal communities. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. If a raptor nest is observed in a tree proposed for removal, the Applicant must consult with California Department of Fish and Wildlife (CDFW). All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/nesting is complete, and the young have fledged the nest.

***b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

***No Impact.*** Based on the *Biological Resources Assessment*, the project site does not contain any State or federally protected wetlands (including, but not limited to, marsh, vernal pool, and coastal waters). The nearest mapped jurisdictional water feature is Arundell Barranca located approximately 1.1 miles northwest of the project site. No impacts to jurisdictional waters or wetlands would occur.

***Mitigation Measures*:** No mitigation is required.

***c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

***No Impact.*** There are no federally protected wetlands present on the project site. Project implementation would not impact federally protected wetlands through direct removal, filling, hydrological interruption or other means. Thus, no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

***Less Than Significant Impact.*** The project site is located within a developed urban area and is surrounded by urbanized uses including roads, commercial uses, and residential uses. The site does not contain any features, such as drainages, ridgelines, or densely vegetated corridors, which would serve as conduits and attract wildlife to use the site as a movement route. Furthermore, based on the *Biological Resources Assessment*, the CDFW does not include any mapped California Essential Habitat Connectivity areas within the study area. Common mammals, such as striped skunk (*Mephitis mephitis*) and raccoon (*Procyon lotor*), may utilize the project site for local movement; however, given the urban nature of the vicinity and lack of connectivity to significant habitat areas, it is unlikely that wildlife utilizes the site for regional movement. Therefore, impacts to wildlife movement would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

***No Impact.*** While the City of Ventura does not have an established ordinance to protect specific species of trees (e.g. California native trees), within the City of Ventura Code of Ordinances, Section 20.150.210, it is unlawful for any person to plant, prune, deface, destroy, or remove or in any manner injure any tree or shrub on any street within the City without first obtaining a permit from the Parks Manager. However, no street trees adjacent to the project footprint will be impacted by construction. Therefore, no impacts to local policies and ordinances would occur.

***Mitigation Measures:*** No mitigation is required.

***f) 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 Impact.*** The project site is not subject to an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

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# 4.5 CULTURAL RESOURCES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5? | | | ✓ | |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5? | | ✓ | | |
| c. Disturb any human remains, including those interred outside of formal cemeteries? | | | ✓ | |

The analysis of cultural resources is based upon the *Phase 1: Historic Assessment Report* (Historic Report), dated March 6, 2020, and prepared by Historic Resources Group (refer to Appendix D, *Historic Assessment Report*).

***a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?***

***Less Than Significant Impact.*** The Historic Report included a field survey and a search of historical records. Sources consulted include the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), City historic resources surveys, the Office of Historic Preservation (OHP) Directory of Properties in the Historic Property Data File, and the City's Historic Landmark List. Based on the Historic Report, the existing property (5250 Ralston Street) is not eligible for listing at the federal, state, or local level, and does not warrant further consideration or additional analysis as a historical resource as defined by the California Environmental Quality Act (CEQA).

Based on the Historic Report, the existing property was developed as an office and printing plant in 1977 by the Ventura County Star-Free Press. However, it was not the site of significant events in the newspaper's history; and it does not represent an important association with the newspaper's historic operations. The building does not represent a significant industrial property type or architectural style. The building was designed by Rasmussen, Love and Ellinwood, an architectural firm about which little is known. Although the building was constructed by the Macleod Construction Company, which is included on the City of Ventura List of Master Architects and Builders, it is not an early or exceptional example of the firm's work. Thus, since the project site is located within an urbanized area, has been impacted by development, and is not eligible for listing, impacts to historic resources would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?***

***Less Than Significant Impact With Mitigation Incorporated.*** Based on the General Plan FEIR, 25 recorded archaeological sites and 96 historic landmarks or points of interest, of which at least 43 may also contain subsurface cultural resources, occur within the City. None of these identified sites fall within the project site area; however, in the unlikely event resources are discovered during ground-disturbing activities, compliance with Mitigation Measure CUL-2, which provides instructions in the event a material of potential cultural significance is uncovered, would reduce

potential impacts to a less than significant level. For a discussion of potential project impacts to tribal cultural resources, refer to Section 4.18, *Tribal Cultural Resources*.

***Mitigation Measures:***

CUL-1 If evidence of subsurface cultural resources is found during excavation and other ground-breaking activities, all work within 50 feet of the discovery shall cease and the construction contractor shall contact the City of Ventura. With direction from the City and in coordination with the Ventura County Archaeological Society and local Native American organizations, as necessary, a certified archaeologist shall be retained to evaluate the discovery prior to resuming grading in the immediate vicinity of the find. If warranted, the archaeologist shall develop a plan of mitigation which may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation of the find in a local museum or repository, and preparation of a report summarizing the find.

***c) Disturb any human remains, including those interred outside of formal cemeteries?***

***Less Than Significant Impact.*** No conditions exist that suggest human remains are likely to be found on the project site. Due to the level of past disturbance on-site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. However, in the event that unknown human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5-7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with existing State regulations, which detail the appropriate actions necessary in the event human remains are encountered, impacts in this regard would be considered less than significant.

***Mitigation Measures:*** No mitigation is required.

# 4.6 ENERGY

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | ✓ | |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | ✓ | |

***a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

***Less Than Significant Impact.***

**Significance Criteria**

Appendix F of the CEQA Guidelines is an advisory document that assists CEQA document preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis below relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 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. If appropriate, the energy intensiveness of materials may be discussed.
- Criterion 2: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the project complies with existing energy standards.
- Criterion 5: The effects of the project on energy resources.
- Criterion 6: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criteria 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criteria 2, 4, and 6, and the building energy demand analysis discusses Criteria 2, 3, 4, and 5.

**State Regulations**

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards

are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings will use about 30 percent less energy, mainly due to lighting upgrades, when compared to those constructed under 2016 Title 24 standards.[1] The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen)

The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2020. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[2]

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), California Air Resources Board (CARB), and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared an Energy Efficiency Strategic Plan in 2011 with the goal of promoting energy efficiency and a reduction in GHG. AB 1109, adopted in 2007, also serves as a framework for lighting efficiency. This bill requires the State Energy Resources Conservation and Development Commission to adopt minimum energy efficiency standards as a means to reduce average Statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. According to the Energy Efficiency Strategic Plan, lighting comprises approximately one-fourth of California's electricity use while nonresidential sector exterior lighting (parking lot, area, walkway, and security lighting) usage comprises 1.4 percent of California's total electricity use, much of which occurs during limited occupancy periods.

[1] California Energy Commission, *2019 Building Energy Efficiency Standards, Frequently Asked Questions*, March 2018.

[2] US Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed June 18, 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted SB 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the 2019 IEPR on February 20, 2020. The 2019 IEPR provides the results of the CEC's assessments of various energy issues facing California and covers a broad range of topics, including implementation of SB 100, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission, landscape-scale planning, electricity and natural gas demand forecast, transportation energy demand forecast, renewable gas, updates on Southern California's electricity reliability, natural gas outlook, and climate adaptation and resiliency.

**Local Regulations**

2005 Ventura General Plan

The *2005 Ventura General Plan* (General Plan), adopted in August 2005, contains the following policy and action related to energy efficiency.

> Policy 1D: Expand the use of green practices.
>
> > Action 1.31: Provide incentives for green building projects in both the public and private sectors to comply with either the LEED™ Rating System, California Green Builder, or the Residential Built Green program and to pursue registration and certification; incentives include "Head-of-the-Line" discretionary processing and "Head-of-the-Line" building permit processing.

**Project-Related Sources of Energy Consumption**

This analysis focuses on three sources of energy that are relevant to the proposed project: electricity, natural gas, and fuel for off-road equipment and vehicle trips associated with project construction and operations. The analysis of operational electricity and natural gas usage is based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) modeling results for the project, which quantifies energy use for occupancy. The project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for Ventura County (County), and consumption factors provided by Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) (the electricity and natural gas providers for the City of San Buenaventura (City), including the project site). The existing on-site structure is currently vacant, and therefore is not analyzed. The results of the CalEEMod modeling and energy usage calculations are included in Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. The amount of operational fuel consumption was estimated using CARB's EMission FACtor Model 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel usage in the County, and the project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the project's construction equipment list, timing/phasing, and duration of use.

The project's estimated energy consumption is summarized in Table 4.6-1, *Energy Consumption*. As shown in Table 4.6-1, the project's electricity usage would constitute an approximate 0.0123 percent increase over the County's typical annual electricity consumption, and an approximate 0.0020 percent increase over the County's typical annual natural gas consumption. Additionally, the project's construction and operational fuel consumption would increase the County's consumption by 0.1833 percent and 0.0624 percent, respectively (CEQA Appendix F - Criterion 1).

**Table 4.6-1**
**Energy Consumption**

| Energy Type | Project Annual Energy Consumption[1] | Ventura County Annual Nonresidential Energy Consumption[2] | Percentage Increase Countywide[2] |
|---|---|---|---|
| Electricity Consumption | 684 MWh | 5,539,426 MWh | 0.0123% |
| Natural Gas Consumption | 332,016 therms | 166,835,709 therms | 0.0020% |
| Fuel Consumption | | | |
| • Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[3] | 34,022 gallons | 18,559,344 gallons | 0.1833% |
| • Operational Automotive Fuel Consumption[3] | 180,546 gallons | 289,402,747 gallons | 0.0624% |

Notes:
1. As modeled in CalEEMod version 2016.3.2 and the California Air Resources Board EMission FACtor model 2017 (EMFAC2017).
2. The project electricity and natural gas consumption are compared to the total consumption in Ventura County in 2018.
   Ventura County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed June 18, 2020.
   Ventura County natural gas consumption data source: California Energy Commission, *Gas Consumption by County*, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed June 18, 2020.
3. Project fuel consumption is calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board's EMFAC2017 model. The project fuel consumption is compared with the projected Countywide fuel consumption in 2021.

Refer to Appendix A for assumptions used in this analysis.

### Construction-Related Energy Consumption

Project construction would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, and construction. As indicated in Table 4.6-1, the project's fuel consumption from construction would be approximately 34,022 gallons, which would increase fuel use in the County by 0.1833 percent. As such, construction would have a nominal effect on the local and regional energy supplies and would not require additional capacity (CEQA Appendix F - Criterion 2).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Furthermore, the project would implement Mitigation Measure AIR-1 as detailed in Section 4.3, *Air Quality*, which requires that all off-road diesel-fueled construction vehicles and equipment greater than 50 horsepower meet Tier 4 emissions standards during the demolition and grading phases of construction. Compliance with Tier 4 emissions standards would not only reduce air pollutant emissions, but also increase fuel efficiency, thus off-road equipment would consume less fuel during project construction. In addition, due to increasing transportation costs and fuel prices, contractors and developers have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (CEQA Appendix F - Criterion 4).

Reductions in energy inputs for construction materials can be achieved by selecting green building materials composed of recycled materials that require less energy to produce than non-recycled materials.[3] The integration of green building materials can help reduce environmental impacts associated with the extraction, transport, processing,

3 California Recycle, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials#Material, accessed June 18, 2020.

fabrication, installation, reuse, recycling, and disposal of these building industry source materials.[4] . It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment, building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (CEQA Appendix F - Criterion 5).

Therefore, construction energy use would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

**Operational Energy Consumption**

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 4.6-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. As indicated in Table 4.6-1, project operations are estimated to consume approximately 180,546 gallons of fuel per year, which would increase the County's automotive fuel consumption by 0.0624 percent. The project would not result in any unusual characteristics that would result in excessive operational fuel consumption (CEQA Appendix F - Criterion 2).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed project. However, the project would include electric vehicle charging stations in the parking lot in compliance with CALGreen Code. This project design feature would encourage and support the use of electric vehicles by the employees and visitors of the proposed project and thus reduce the petroleum fuel consumption. Further, according to the *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020), the project would be located close to Downtown Ventura, within 0.5-mile of an existing Class I path or Class II bike lane, provide pedestrian access that links the on-site pedestrian network to the City's off-site pedestrian network (i.e., sidewalks), and encourage alternative transportation mode and ride-share by providing bicycle parking spaces and sheltered waiting areas on-site. All these features would reduce project-related vehicle trips and associated transportation fuel consumption (CEQA Appendix F - Criterion 4 and Criterion 6).

Therefore, fuel consumption associated with project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. As such, a less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2018–2030 forecasts for energy consumption and peak demand in support of the 2017 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections. CEC forecasts that the statewide annual average growth rates of energy demand between 2016 and 2030 would be 0.99 percent to 1.59 percent for electricity and 0.25 percent to 0.77 percent for natural gas.[5] As

4 Ibid.

5 California Energy Commission, *California Energy Demand 2018-2030 Revised Forecast*, February 2018. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Table 1 and Table 3, respectively.

indicated in Table 4.6-1, operational energy consumption would represent an approximate 0.0123 percent increase in electricity consumption and a 0.0020 percent increase in natural gas consumption over the current Countywide usage, which are significantly lower than the CEC's energy demand forecasts. The project would be operational during typical business hours (7:00 a.m. to 5:00 p.m., Monday through Friday) and consume energy during the same time periods as other commercial developments. As a result, the project would not result in unique or more intensive peak or base period electricity demand (CEQA Appendix F - Criterion 2 and Criterion 3).

The project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems. The project would be required to comply with 2019 Title 24 standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2019 Title 24 standards would significantly reduce project-related energy usage (30 percent compared to the 2016 standards). The Title 24 standards are updated every 3-year and become more stringent between each update, therefore, complying with the latest 2019 Title 24 standards would make the proposed project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (CEQA Appendix F - Criterion 4).

Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030. In 2019, 48 percent of the electricity that SCE delivered was from carbon-free resources, therefore SCE is on track to achieving the RPS goals.[6] Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of the finite energy resources (CEQA Appendix F - Criterion 5).

Therefore, the project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

***Mitigation Measures:*** No mitigation is required.

***b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

***Less Than Significant Impact.*** The City currently does not have a plan pertaining to renewable energy or energy efficiency. The applicable plans and policies for renewable energy and energy efficiency include the 2019 Title 24 standards, the 2019 CALGreen Code, CPUC's Energy Efficiency Strategic Plan, CEC's 2019 IEPR, and the City's General Plan. The project would be required to comply with the latest Title 24 and CALGreen standards pertaining to building energy efficiency. Compliance with 2019 Title 24 standards and 2019 CALGreen Code would ensure the project incorporates energy-efficient windows, insulation, lighting, and ventilation systems, which are consistent with the Energy Efficiency Strategic Plan strategies, the IEPR building energy efficiency recommendations, and General Plan Policy 1D, as well as water-efficient fixtures and electric vehicles charging stations. Additionally, per the RPS, the project would utilize electricity provided by SCE that would achieve at least 60 percent renewable energy by 2030. Therefore, the proposed project would be consistent with renewable energy or energy efficiency plans and impacts would be less than significant.

***Mitigation Measures:*** No mitigation is required.

[6] Southern California Edison, *Edison International Sustainability Report 2019*, https://www.edison.com/content/dam/eix/documents/sustainability/eix-2019-sustainability-report.pdf, accessed June 18, 2020.

# 4.7 GEOLOGY AND SOILS

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 1) 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? Refer to Division of Mines and Geology Special Publication 42. | | | | ✓ |
| 2) Strong seismic ground shaking? | | | ✓ | |
| 3) Seismic-related ground failure, including liquefaction? | | | ✓ | |
| 4) Landslides? | | | | ✓ |
| b. Result in substantial soil erosion or the loss of topsoil? | | | ✓ | |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | ✓ | |
| d. 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? | | | ✓ | |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | | | | ✓ |
| f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | ✓ | | |

This section is based on the *Geotechnical Engineering Study, Proposed Department of Veterans Affairs, Community Based Outpatient Clinic* (Geotechnical Study), dated December 6, 2019, and prepared by Advanced Geotechnical Services, Incorporated (refer to Appendix C, *Geotechnical Study*).

***a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***1) 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? Refer to Division of Mines and Geology Special Publication 42.***

***No Impact.*** Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone. Although the project site is in proximity to a number of local and regional active faults, no

Alquist-Priolo Earthquake Fault Zones traverse the project site.[1] Thus, implementation of the proposed project would not result in the rupture of a known earthquake fault as delineated on an Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***2) Strong seismic ground shaking?***

***Less Than Significant Impact.*** Southern California has numerous active seismic faults subjecting residents to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for residents and structures, categorized either as primary or secondary hazards. Primary hazards include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Primary hazards can also induce secondary hazards such as ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires. Although no known active or inactive faults exists within the project vicinity and there is a very low probability of exposure to primary seismic hazards, secondary hazards pose a threat to the community as a result of the project's proximity to active regional faults.

According to the General Plan FEIR, the project area is affected by both local and regional active faults. The major faults in the area include the Ventura-Foothill, Country Club, Oak Ridge, McGrath, and Red Mountain faults.

The proposed project would not affect subsurface geology or the probability of a seismic event, nor would it include the development of any habitable structures or other facilities that could result in substantial hazards during a seismic event. Implementation of the proposed project would result in construction of a new VA CBOC. Based on the Geotechnical Study, the building design and construction material would comply with the California Building Code and site-specific seismic design criteria. Project-specific recommendations have been provided in the Geotechnical Study and will be incorporated during final design and implemented during construction. Therefore, impacts pertaining to seismic ground shaking would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***3) Seismic-related ground failure, including liquefaction?***

***Less Than Significant Impact.*** Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Liquefaction is characterized by a loss of shear strength in the affected soil layers, thereby causing the soils to behave as a viscous liquid. Susceptibility to liquefaction is based on geologic and geotechnical data. River channels and floodplains are considered most susceptible to liquefaction, while alluvial fans have a lower susceptibility. Depth to groundwater is another important element in the susceptibility to liquefaction. Groundwater shallower than 30 feet results in high to very high susceptibility to liquefaction, while deeper water results in low and very low susceptibility.

Based on the Geotechnical Study, the earth materials underlying the project site would be expected to behave like clays, and would not be considered susceptible to liquefaction, or related phenomena. Therefore, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

[1] California Department of Conservation, Earthquake Zones of Required Investigation Saticoy Quadrangle, https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SATICOY_EZRIM.pdf, accessed on April 6, 2020.

***4) Landslides?***

***No Impact.*** Landslides are a geologic hazard, with some moving slowly and causing damage gradually, and others moving rapidly and causing unexpected damage. Gravity is the force driving landslide movement. Factors that commonly allow the force of gravity to overcome the resistance of earth material to landslide movement include saturation by water, steepening of slopes by erosion or construction, alternate freezing or thawing, and seismic shaking.

Based on the Geotechnical Study, the project site is not located in a Seismic Hazard Zone for landslides, and the subject site and surrounding areas are relatively flat. Therefore, no impacts would occur in in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) Result in substantial soil erosion or the loss of topsoil?***

***Less Than Significant Impact.*** Refer to Responses 4.10(a) and 4.10(c)(1) for potential impacts pertaining to the potential for erosion/siltation-related impacts and the potential for loss of topsoil as a result of the proposed project. Construction activities could potentially result in soil erosion or loss of topsoil due to ground disturbing activities required to construction, but these activities would be limited in duration. The project would be subject to requirements under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ). A Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP is required to contain a site map(s) that depicts the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list Best Management Practices (BMPs) the discharger would use to protect stormwater runoff and the placement of those BMPs. BMPs for construction activities may include measures to control pollutants at particular sources, such as fueling areas, trash storage areas, outdoor materials storage areas, and outdoor work areas. BMPs are also used during treatment of the pollutants at these particular source areas. In addition to the BMPs, the SWPPP must contain: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. As such, potential impacts in this regard during the construction phase would be less than significant.

During long-term operations, the proposed project is not anticipated to result in significant impacts related to erosion and loss of topsoil. The project would include infiltration/detention basins that would capture peak runoff on-site during the 25-, 50-, and 100-year storm events. Further, as noted in Response 4.10(a), a Water Quality Management Plan (WQMP) would be prepared for the project. The WQMP would identify Best Management Practices (BMPs) to minimize impacts to water quality, including erosion and loss of topsoil, and implementation of these BMPs would be closely monitored as required by the National Pollutant Discharge Elimination System (NPDES) permit. As such, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***c) 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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

***Less Than Significant Impact.*** The project would not result in significant impacts related to ground motion (such as lateral spreading or collapse), liquefaction, or landslides; refer to Responses 4.7(a)(2), 4.7(a)(3), and 4.7(a)(4), above. The proposed project would involve the construction of a new VA CBOC. Project implementation would not affect subsurface geology, nor would it include the development of any habitable structures or other facilities that

could result in substantial hazards related to unstable soil or seismic event. In addition, building design and construction material would comply with the California Building Code and site-specific seismic design criteria. Project-specific recommendations have been provided in the Geotechnical Study and will be incorporated during final design and implemented during construction. Therefore, impacts pertaining to unstable soils would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***d) 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?***

***Less Than Significant Impact.*** Based on the Geotechnical Study, on-site soils are within the upper end of the medium expansion category. However, project implementation would 1) conform to California Building Code design and construction regulations, 2) incorporate and adhere to project-specific recommendations provided in the Geotechnical Study. Therefore, impacts pertaining to expansive soils would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

***No Impact.*** No septic tanks or alternative wastewater systems would be required or installed as a result of the proposed project, and no impact would occur.

***Mitigation Measures:*** No mitigation is required.

***f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

***Less Than Significant Impact With Mitigation Incorporated.*** The project site has been previously graded and disturbed. Although this project proposes grading activities, in is not anticipated to directly or indirectly destroy paleontological resources. In the unlikely event that paleontological resources or unique geologic feature are encountered during ground-disturbing activities, Mitigation Measures GEO-1 has been incorporated. Measure GEO-1 would require that construction activity cease and a paleontologist be consulted for evaluation of paleontological resources, should such resources be discovered during project construction. With implementation of this mitigation measure, impacts would be less than significant.

***Mitigation Measures:***

GEO-1 If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease and the construction contractor shall contact the City of Ventura. With direction from the City, a paleontologist certified by the County of Ventura shall evaluate the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources.

# 4.8 GREENHOUSE GASES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | ✓ | |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | ✓ | |

***a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

***b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

***Less Than Significant Impact.***

**Global Climate Change**

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 420 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) per year.[1] Methane ($CH_4$) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of $CO_2$, $CH_4$, and nitrous oxide ($N_2O$) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that $CO_2$ concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global $CO_2$ concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of June 2020, the highest monthly average concentration of $CO_2$ in the atmosphere was recorded at 417 ppm.[2]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent ($CO_2e$)[3] concentration is required to keep global mean warming below 2 degrees Celsius ($^oC$), which in turn is assumed to be necessary to avoid dangerous climate change.

[1] California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2017,* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2017/ghg_inventory_trends_00-17.pdf, accessed June 23, 2020.

[2] Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed June 23, 2020.

[3] Carbon Dioxide Equivalent ($CO_2e$) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

**Regulations and Significance Criteria**

State

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is underway, and there is a real potential for severe adverse environmental, social, and economic effects in the long term.

*Assembly Bill 32 (California Global Warming Solutions Act of 2006)*. California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). Assembly Bill (AB) 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 (Pavley Bill) should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

*Executive Order S-3-05*. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

*Senate Bill 32*. Signed into law in September 2016, Senate Bill (SB) 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

*CARB Scoping Plan*. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce $CO_2e$ emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU)[4] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the

[4] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The Scoping Plan update did not establish or propose any specific post-2020 goals, but identified such goals in water, waste, natural resources, clean energy, transportation, and land use.

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan (2017 Scoping Plan Update), which identifies the State's post-2020 reduction strategy. The Second Update was approved on December 14, 2017 and reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The 2017 Scoping Plan Update establishes a new emissions limit of 260 million $MTCO_2e$ per year for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

Local

*2005 Ventura General Plan*. The 2005 Ventura General Plan (General Plan), adopted in August 2005, contains the following policies and actions related to GHG emission reduction.

Policy 1D: Expand the use of green practices.

Action 1.31: Provide incentives for green building projects in both the public and private sectors to comply with either the LEED™ Rating System, California Green Builder, or the Residential Built Green program and to pursue registration and certification; incentives include "Head-of-the-Line" discretionary processing and "Head-of-the-Line" building permit processing.

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

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

Action 5.5: Provide incentives for new residences and businesses to incorporate recycling and waste diversion practices, pursuant to guidelines provided by the Environmental Services Office.

Significance Criteria

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, the Ventura County Air Pollution Control District (VCAPCD), CARB, or any other State or regional agency have not yet adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

**Project-Related Sources of Greenhouse Gases**

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of $CO_2$, $N_2O$, and $CH_4$, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. The existing on-site structure is currently vacant, and therefore is not analyzed.

The most recent version of the California Emissions Estimator Model (CalEEMod), version 2016.3.2, as well as the CARB's EMission FACtor Model 2017 (EMFAC2017), was used to calculate direct and indirect project-related GHG emissions. CalEEMod relies upon trip data from the *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020) and project-specific land use data to calculate emissions. Table 4.8-1, *Projected Annual Greenhouse Gas Emissions*, presents the estimated $CO_2$, $N_2O$, and $CH_4$ emissions from the proposed project. CalEEMod outputs are contained within Appendix A, *Air Quality/Greenhouse Gas/Energy Data*.

**Table 4.8-1**
**Projected Annual Greenhouse Gas Emissions**

| Source | $CO_2$ | $CH_4$ | | $N_2O$ | | Total Metric Tons of $CO_2e$[2,3] |
|---|---|---|---|---|---|---|
| | Metric Tons/yr[1] | Metric Tons/yr[1] | Metric Tons of $CO_2e$[1,3] | Metric Tons/yr[1] | Metric Tons of $CO_2e$[1,3] | |
| **Direct Emissions** | | | | | | |
| Construction (amortized over 30 years) | 13.96 | <0.01 | 0.05 | 0.00 | 0.00 | 14.02 |
| Area Source | 0.01 | <0.01 | <0.01 | 0.00 | 0.00 | 0.01 |
| Mobile Source[4] | 1,126.48 | 0.07 | 1.71 | 0.00 | 0.00 | 1,128.18 |
| *Total Direct Emissions*[2] | **1,140.45** | **0.07** | **1.76** | **0.00** | **0.00** | **1,142.21** |
| **Indirect Emissions** | | | | | | |
| Energy | 176.81 | <0.01 | 0.01 | <0.01 | 0.10 | 176.92 |
| Solid Waste | 27.73 | 1.64 | 40.97 | 0.00 | 0.00 | 68.69 |
| Water Demand | 19.93 | 0.17 | 4.14 | <0.01 | 1.17 | 25.24 |
| *Total Indirect Emissions*[2] | **224.47** | **1.80** | **45.11** | **<0.01** | **1.26** | **270.85** |
| ***Total Project-Related Emissions***[2] | **1,364.92** | **1.87** | **46.87** | **<0.01** | **1.26** | **1,413.06** |

Notes: $MTCO_2e$/yr = metric tons of carbon dioxide equivalent per year
1. Emissions calculated using the CalEEMod version 2016.3.2. and the California Air Resources Board EMission FACtor model 2017 (EMFAC2017).
2. Totals may be slightly off due to rounding.
3. Carbon dioxide equivalent values calculated using the global warming potentials from the Intergovernmental Panel on Climate Change Fourth Assessment Report, consistent with CalEEMod assumptions.4. Mobile source includes reductions from current General Plan land use trips according to Traffic Impact Analysis.

Refer to Appendix A for assumptions used in this analysis.

Reduced Greenhouse Gas Emissions

The proposed project includes design features that would reduce project-related GHG emissions. Consistent with California Green Building Standards Code (CALGreen Code), the project would install water-efficient irrigation systems and landscaping and incorporate water-reducing features and fixtures into the proposed building. The proposed project would include recycling and composting practices consistent with AB 341, which requires 75 percent diversion rate of solid waste. Furthermore, the project would comply with the 2019 Title 24 Building Energy Efficiency Standards (Title 24 standards), which requires installation of high-efficiency lighting, and would reduce energy usage by approximately 30 percent compared to nonresidential buildings constructed under the 2016 Title 24 standards.[5] These design features would ensure the project would be compliance with the City's General Plan Policy 1D and Policy 5A. The GHG emissions presented in Table 4.8-1 incorporated these project design features.

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions. As shown in Table 4.8-1, the proposed project would result in construction emissions of approximately 420.53 $MTCO_2e$, which represents 14.02 $MTCO_2e/yr$ when amortized over 30 years.

Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. As noted in Table 4.8-1, the proposed project would result in 0.01 $MTCO_2e/yr$ of area source GHG emissions.

Mobile Source. CalEEMod relies upon trip data within the Traffic Impact Analysis and project-specific land use data to calculate mobile source emissions. According to the Traffic Impact Analysis, the proposed project would generate a net increase of 1,576 daily trips. The project would directly result in 1,128.18 $MTCO_2e/yr$ of mobile source-generated GHG emissions; refer to Table 4.8-1.

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity and natural gas would be provided to the project site by Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). The project would indirectly result in 176.92 $MTCO_2e/yr$ due to energy consumption; refer to Table 4.8-1.

Solid Waste. Solid waste associated with operations of the proposed project would result in 68.69 $MTCO_2e/yr$; refer to Table 4.8-1.

Water Demand. The project operations would result in a demand of approximately 6.2 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 25.24 $MTCO_2e/yr$; refer to Table 4.8-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table 4.8-1, the proposed project-related GHG emissions from direct and indirect sources combined would total 1,413.06 $MTCO_2e/yr$.

[5] California Energy Commission, 2019 Building Energy Efficiency Standards Fact Sheet, March 2018.

**Consistency with Applicable GHG Plans, Policies, or Regulations**

The City has not adopted a Climate Action Plan (CAP) or any other plan for the purpose of reducing GHG emissions. Thus, the GHG plan consistency for this project is based off the project's consistency with the Southern California Association of Governments (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016–2040 RTP/SCS), the CARB's 2017 Scoping Plan Update, and the City's General Plan. The 2016-2040 RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the southern California region. The 2016-2040 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2017 Scoping Plan Update describes the approach California would take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030. The City's General Plan includes policies and actions related to GHG emission reduction.

Consistency with the 2016-2040 RTP/SCS

The 2016-2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.[6] Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016-2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[7] The 2016-2040 RTP/SCS would result in an estimated 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 19 percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

The project would also be consistent with the following key GHG reduction strategies in the 2016-2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The project is an infill development within an urbanized area slated for development and already supported by existing transportation systems. Further, according to the Traffic Impact Analysis, the project would be located within 0.5-mile of an existing Class I path or Class II bike lane and would provide pedestrian access that links the on-site pedestrian network to the City's off-site pedestrian network (i.e., sidewalks).

At the regional level, the 2016-2040 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions. In order to assess the project's potential to conflict with the 2016-2040 RTP/SCS, this section also analyzes the project's land use assumptions for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

[6] California Air Resources Board, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.
[7] Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 153, April 2016.

Table 4.8-2, *Consistency with the 2016-2040 RTP/SCS*, demonstrates the project's consistency with the actions and strategies set forth in the 2016-2040 RTP/SCS.[8]

**Table 4.8-2**
**Consistency with the 2016-2040 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Project Consistency Analysis |
|---|---|---|
| **Land Use Actions and Strategies** | | |
| Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood-oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots. | Local Jurisdictions, Council of Government (COGs), SCAG, County Transportation Commission (CTCs) | **Consistent.** The project would not impair the City or SCAG's ability to encourage the use of alternative fueled vehicles through various policies and programs. Specifically, the project would be required to comply with the CALGreen Nonresidential Mandatory Measure 5.106.5.3 *Electric Vehicle (EV) Charging*, which requires the project to include EV charging stations on-site. |
| Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance. | Local Jurisdictions, SCAG | **Consistent.** The project would construct a clinic building consisting of approximately 51,000 square feet of building area, which would provide jobs for a variety of skills and education. In addition, the project site is close to existing housing, school, and commercial uses. |
| **Transportation Network Actions and Strategies** | | |
| Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles. | SCAG, CTCs, Local Jurisdictions | **Consistent.** The project is located within a half mile of the Gold Coast Transit District's bus stops and is surrounded by residential and commercial uses. The project would provide bicycle parking spaces and EV charging stations on-site. Furthermore, the project would be located near bike lanes and provide pedestrian network improvements. Therefore, the project would not conflict with SCAG's strategy to reduce vehicle trips, thereby contributing to a reduction in air pollutant and GHG emissions. |
| Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options. | CTCs, Local Jurisdictions | **Consistent.** The project would not impair the CTCs', or the City's, ability to develop first-mile/last-mile strategies. In support of this strategy, the project would be located within walking distance of local and regional transit stops, near bike lanes, and provide pedestrian network improvements. |

[8] The actions and strategies included in the 2016-2040 RTP/SCS remain unchanged from those adopted in the 2012-2035 RTP/SCS.

**Table 4.8-2 [Continued]**
**Consistency with the 2016-2040 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Project Consistency Analysis |
|---|---|---|
| **Transportation Demand Management (TDM) Actions and Strategies** | | |
| Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes. | SCAG, Local Jurisdictions | **Consistent.** As previously discussed, the project is located within a half mile of the Gold Coast Transit District's bus stops and is surrounded by residential and commercial uses. The project would also provide bicycle parking spaces and EV charging stations on-site. In addition, the project would provide sheltered waiting areas on-site to encourage ride-share. Therefore, the project would not conflict with SCAG's action to reduce commuting vehicle trips, thereby contributing to a reduction in air pollutant and GHG emissions. |
| Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options. | Local Jurisdictions, CTCs | **Consistent.** The project would encourage the development of telecommuting programs and alternative work options. |
| Source: Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016. | | |

In summary, the project is the type of land use development that is encouraged by the 2016-2040 RTP/SCS to reduce vehicle trips and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

Consistency with the 2017 Scoping Plan Update

The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan in 2013. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve Statewide GHG emissions targets. Provided in Table 4.8-3, *Consistency with the 2017 Scoping Plan Update*, is an evaluation of applicable reduction actions/strategies by emissions source category to determine whether the project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan Update.

**Table 4.8-3**
**Consistency with the 2017 Scoping Plan Update**

| Actions and Strategies | Project Consistency Analysis |
|---|---|
| **Senate Bill 350** | |
| Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030. | **Consistent.** The project would not be an electrical provider nor would it delay the goals of SB 350. The project would utilize electricity from SCE, which is required to comply with SB 350. As such, it can be reasonably inferred that the project would be in compliance with SB 350. |

**Table 4.8-3 [Continued]**
**Consistency with the 2017 Scoping Plan Update**

| Actions and Strategies | Project Consistency Analysis |
|---|---|
| **Low Carbon Fuel Standard (LCFS)** | |
| Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020. | **Consistent.** Motor vehicles driven by the proposed project's employees and visitors would be required to use LCFS compliant fuels, thus the project would be in compliance with this strategy. |
| **Mobile Source Strategy (Vehicle Technology and Clean Fuels)** | |
| Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road by 2030. Increase the number of ZEV buses, delivery trucks, or other trucks. | **Consistent.** The project would include light-duty truck trips that would be required to comply with the applicable CARB and VCAPCD regulations. Furthermore, the project would be required to comply with CALGreen Code Nonresidential Mandatory Measure 5.106.5.3 *Electric Vehicle (EV) Charging* and would include EV charging stations on-site. As such, the project would not conflict with the goals of the Mobile Source Strategy. |
| **Short-Lived Climate Pollutant (SLCP) Reduction Strategy** | |
| Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030. | **Consistent.** The project does not involve sources that would emit large amounts of $CH_4$ (refer to Table 4.8-1). Furthermore, the project would comply with all CARB and VCAPCD hydrofluorocarbon regulations. As such, the project would not conflict with the SLCP reduction strategy. |
| **SB 375 Sustainable Communities Strategies** | |
| Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO). | **Consistent.** As shown in Table 4.8-2, the project would be consistent with the 2016-2040 RTP/SCS and would not conflict with the goals of SB 375. |
| **Post-2020 Cap and Trade Programs** | |
| The Cap-and-Trade Program would reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals. | **Consistent.** The project would not be a gross emitter of $CO_2e$ emissions (25,000 metric tons per year), and thus would be exempt from the Cap and Trade Program and would not conflict with this goal. |
| Source: California Air Resources Board, *2017 Scoping Plan*, November 2017. | |

Consistency with the 2005 Ventura General Plan

The City's General Plan includes policies and actions related to GHG emission reduction, and implementation of these policies and actions would contribute to a reduction in the City's overall GHG emissions. Table 4.8-4, *Project Consistency with the 2005 Ventura General Plan* compares the proposed project to applicable policies from the General Plan.

**Table 4.8-4**
**Consistency with the 2005 Ventura General Plan**

| Goal/Policy | Project Consistency |
|---|---|
| **Policy 1D: Expand the use of green practices.** | |
| **Action 1.31**: Provide incentives for green building projects in both the public and private sectors to comply with either the LEED™ Rating System, California Green Builder, or the Residential Built Green program and to pursue registration and certification; incentives include "Head-of-the-Line" discretionary processing and "Head-of-the-Line" building permit processing. | **Consistent.** The project would include energy efficiency designs in compliance with the 2019 Title 24 Building Energy Efficiency Standards and the applicable requirements of the CALGreen Code. |
| **Policy 5A: Follow an approach that contributes to resource conservation.** | |
| **Action 5.1**: Require low flow fixtures, leak repair, and drought tolerant landscaping (native species if possible), plus emerging water conservation techniques, such as reclamation, as they become available. | **Consistent.** The project would meet the 2019 Title 24 Building Energy Efficiency Standards and the applicable requirements of the CALGreen Code, including installing water-efficient irrigation systems and landscaping and incorporate water-reducing features and fixtures into the proposed building. |
| **Action 5.5**: Provide incentives for new residences and businesses to incorporate recycling and waste diversion practices, pursuant to guidelines provided by the Environmental Services Office. | **Consistent.** The proposed project would include recycling and composting practices consistent with AB 341, which requires 75 percent diversion rate of solid waste. |
| Source: *2005 Ventura General Plan,* August 2005. | |

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2016-2040 RTP/SCS, the 2017 Scoping Plan Update, and the City's General Plan. Thus, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project-specific impacts with regard to greenhouse gases would be less than significant.

***Mitigation Measures:*** No mitigation is required.

# 4.9 HAZARDS AND HAZARDOUS MATERIALS

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | ✓ | |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | ✓ | | |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | | ✓ |
| d. 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? | | | | ✓ |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | | | | ✓ |
| f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | ✓ | | |
| g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | ✓ |

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

***Less Than Significant Impact*.**

**Short-Term Impacts**

Construction activities would involve the use of certain hazardous materials such as fuels, oils, solvents, and glues. Transport, use, or disposal of these hazardous substances during construction would occur according to instructions provided by the product manufacturer, including proper methods of storage and disposal. Inadvertent release of large quantities of these materials into the environment could adversely impact workers, the public, soil, or water quality. The project would comply with existing Federal, State, and local standards in regards to the storage and use of hazardous materials during construction. Additionally, implementation of construction best management practices as part of a Stormwater Pollution Prevention Plan, required by the National Pollution Discharge Elimination System General Construction Permit, would minimize the potential for adverse effects to workers, the public, soils, and water quality. Impacts in regards to short-term construction would be less than significant.

**Operational Impacts**

Within the regulatory framework of the Medical Waste Management Act, the Medical Waste Management Program of the California Department of Public Health ensures the proper handling, storage, and disposal of medical waste throughout the State. At the Federal level, the Department of Veterans Affairs, Veterans Health Administration (VHA) mandates VA facilities adhere to the requirements set forth in their Waste Management Program (VHA Directive 1850.06). The Ventura County Department of Environmental Health enforces the Medical Waste Management Act locally as well as the City of Ventura Fire Department. In addition, the California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires that any business that handles hazardous materials prepare a business plan. This plan must include floor plans of the facility and business conducted at the site, an inventory of hazardous materials that are handled or stored on the site; an emergency response plan, and a safety and emergency response training program.

Operation of the project as a medical facility would include the handling, storage, and transport of hazardous materials, waste, and biomedical waste. These chemicals and other materials including dental amalgam (a liquid mercury and metal alloy mixture used in dentistry to fill cavities) are primarily used during patient care, laboratory testing and medical diagnostics, and equipment maintenance. The project would not be expected to handle, store, or transport these materials in large quantities; smaller quantities of hazardous materials can be transported to and used on-site in compliance with applicable regulations. The California Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage and disposal of hazardous waste. The California Occupational Safety and Health Administration (Cal/OSHA) regulations concerning the use of hazardous materials in the workplace require employee training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plans. The Radiological Health Branch of the California Department of Public Health administers the State's Radiation Control Law, which governs the use, transportation, and disposal of sources of ionizing radiation, to the extent that such substances may be used or transported at the project site at inception or at a future date.

The project would be required to conform to Federal and State laws as well as local laws, ordinances, and procedures regarding the proper handling, use, and disposal of hazardous materials. State and Federal hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills. The project shall also be liable for the medical waste management fees as outlined in the Ventura County Municipal Code (Chapter 5, Hazardous Substances). Compliance with applicable regulations would result in a less than significant impact relating to the routine transport, use, or disposal of hazardous materials at the project site.

***Mitigation Measures:*** No mitigation is required.

***b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

***Less Than Significant Impact With Mitigation Incorporated.*** One of the means through which human exposure to hazardous substances could occur is through accidental release. Incidents that result in an accidental release of hazardous substances into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. Human exposure of contaminated soil, soil gas, or water can have potential health effects based on a variety of factors, such as the nature of the contaminant and the degree of exposure.

**Short-Term Impacts**

Construction activities would include grading, site preparation, building construction, and architectural coating. There is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment during project construction. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized for construction equipment. The construction contractor would be required to use standard construction controls and safety procedures that would minimize and/or avoid accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law. As such, impacts in this regard would be less than significant.

Demolition of Existing Structures

As discussed in Section 2.2, *Environmental Setting*, the existing vacant facility was developed as an office and printing plant in 1977. Due to the age of the building, there is potential for asbestos-containing materials (ACMs) and lead-based paint (LBP)to be present in association with the building materials. Thus, demolition of the structures could expose construction personnel and the public to ACMs and/or LBPs.

The National Emission Standards for Hazardous Air Pollutants mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition (Mitigation Measure HAZ-1). If ACMs are found, abatement of asbestos would be required prior to any demolition activities. If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste would be required to be evaluated independently from the building material by a qualified Environmental Professional (Mitigation Measure HAZ-2). If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Compliance with Mitigation Measures HAZ-1 and HAZ-2, as well as compliance to South Coast Air Quality Management District (SCAQMD) Rule 1403, would reduce potential impacts in this regard to less than significant levels.

Coca-Cola Bottling Company

Coca-Cola Bottling Company (Coca-Cola property) adjoins the project site to the southeast at 5335 Walker Street and is listed on the State Water Resources Control Board's data management system (GeoTracker) as a completed "LUST Clean Up Site."[1]

In July 1991, four underground storage tanks (USTs) were removed from the Coca-Cola property. Elevated levels of hydrocarbon were detected in soil at 12 feet below the ground surface. Subsurface investigations and remedial work (soil excavation) had been conducted from 1992 to 1996. The results from the final subsurface investigation in 1996 indicated that the levels of contamination were below the thresholds determined to be acceptable at that time . Thus, a case closure letter for the former UST contaminated site was issued by the County of Ventura Environmental Health Division on December 18, 1996. Accordingly, it is not anticipated that the proposed project site is impacted by the former UST contaminated site. A less than significant impact would occur in this regard.

Historic Agricultural Uses

Based on historic aerial imagery, prior to the mid-1970s the site was undeveloped and utilized for agricultural purposes. However, in 1977 the property was cleared and graded for construction of the existing industrial facility. No known

[1] State Water Resources Control Board, Geotracker, Coca-Cola Bottling Co (T0611100973), https://geotracker.waterboards.ca.gov/profile_report?global_id=T0611100973. Accessed on April 23, 2020.

contamination has been reported in association with these past uses. Thus, a less than significant impact associated with accidental release of hazardous materials in existing soils during grading activities are anticipated.

**Operations**

The project would be required to comply with all applicable Federal, State, and local regulations including the provisions of the Medical Waste Management Act, VHA Directive 1850.06, Business Plan Act, DTSC, CAL/OSHA, and Radiological Health Branch; refer to Response 4.9(a). Adherence to these laws and regulations would minimize risks regarding the proper handling, use, and disposal of hazardous materials during project operation. Impacts in this regard would be less than significant.

***Mitigation Measures*:**

HAZ-1 Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the Ventura County Air Pollution Control District (Ventura County APCD) Rule 62.7.

HAZ-2 If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City of San Buenaventura.

***c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

***No Impact*.** There are no existing or proposed schools located within 0.25-mile of the project site. The nearest school is Montalvo Elementary School, located approximately 0.65-mile southeast of the project site at 2050 Grand Ave. Thus, no impact would occur in this regard.

***Mitigation Measures*:** No mitigation is required.

***d) 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?***

***No Impact*.** Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board compile and update a regulatory sites listing. The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and subject to water analysis pursuant to Section 116395 of the Health and Safety Code. Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations (CCR), to compile, as appropriate, a list of all solid waste

disposal facilities from which there is a known migration of hazardous waste. The project site is not listed pursuant to Government Code Section 65962.5.[2] Thus, no impact would result in this regard.

***Mitigation Measures:*** No mitigation is required.

***e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

***No Impact.*** The nearest airport to the project site is the Oxnard Airport, located approximately 3.7 miles to the south of the project site at 2889 W 5th Street in the City of Oxnard. According to the Ventura County Airport Land Use Commission, the project site is not located within an airport land use plan.[3] Thus, no impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

***Less Than Significant Impact With Mitigation Incorporated.*** According to the General Plan, the City currently uses the Standardized Emergency Management System (SEMS) for emergency response, where depending on the type of incident, several different agencies and disciplines may be called upon to assist with emergency response. Agencies and disciplines that can be expected to be part of an emergency response team include medical, health, fire and rescue, police, public works, and the coroner. Further, the City adopted the *2015 Ventura County Multi-Hazard Mitigation Plan* (2015 MHMP) developed by the County of Ventura, nine of the ten incorporated cities, and several other public agencies. The purpose of the 2015 MHMP is to identify policies and actions that can be implemented in Ventura County to reduce risk and future losses related to hazards such as flooding, tsunamis, earthquakes, wildfires, and agricultural biological hazards.

As indicated in Section 4.17, *Transportation*, the project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to local roadways (e.g., farm equipment). The proposed driveways and circular travel way designed for patient drop-off and fire access in front of the medical building would meet the fire truck turning radii and fire access requirements, and would not result in inadequate emergency access. Additionally, the project would be subject to City of Ventura Fire Department review of the site plans, site construction, and structures prior to occupancy. This review would include verifying that the proposed site ingress and egress is adequate for emergency response. Further, the proposed VA CBOC would be similar to existing industrial and commercial uses within the project vicinity. Temporary lane closures would occur during construction activities associated with construction of the proposed entrance improvements along Ralston Street and Walker Street, sidewalk improvements, and any work required within roadway right-of-way. To address this temporary issue, Mitigation Measure TR-1 would be implemented during construction. Mitigation Measure TR-1 would require implementation of a Transportation Management Plan (TMP), which would include various provisions to ensure continuous and adequate emergency access along Ralston Street, Saratoga Avenue, Walker Street, and Glacier Avenue during the construction process. The TMP could include measures such as construction signage, pedestrian protection, limitations on timing for lane closures to avoid peak hours, temporary striping plans, identification of alternate bus stops during potential short-term bus stop closures, construction vehicle routing plans, and the need for a construction flag person to direct traffic during heavy equipment use. With implementation of Mitigation Measure TR-1, the impact to an adopted emergency response plan or emergency evacuation plan would be less than significant.

[2] California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed April 20, 2020.
[3] Ventura County Airport Land Use Commission, *Airport Comprehensive Land Use Plan Update for Ventura County*, *Exhibit 3A, Oxnard Airport Study Area and Jurisdictional Boundaries*, adopted July 7, 2000.

***Mitigation Measures:*** Refer to Mitigation Measure TR-1.

***g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

***No Impact.*** Refer to Responses 4.20(a) and 4.20(b).

***Mitigation Measures:*** No mitigation is required.

# 4.10 HYDROLOGY AND WATER QUALITY

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | | | ✓ | |
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | | | ✓ | |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| 1) Result in substantial erosion or siltation on- or off-site? | | | ✓ | |
| 2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? | | | ✓ | |
| 3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | | | ✓ | |
| 4) Impede or redirect flood flows? | | | ✓ | |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | ✓ | |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | ✓ | |

This section is primarily based upon the *Preliminary Hydrology Letter* (Hydrology Letter), prepared by Jensen Design and Survey, Inc., dated February 17, 2020 (refer to Appendix G, *Hydrology Letter*).

### *a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

***Less Than Significant Impact.*** As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial, construction, and municipal pollutant discharges. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Los Angeles RWQCB.

Runoff from the project site drains towards the U.S. 101 east drain and eventually is tributary to the Santa Clara River and finally the Pacific Ocean. The *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal*

*Watersheds of Los Angeles and Ventura Counties* (Basin Plan) identifies beneficial uses for the Santa Clara River Watershed, including irrigation and drinking water supply.[1] The *Final 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List/305 (b) Report)* has designated Santa Clara River Reach 1 as impaired. Total Maximum Daily Load pollutants of concern include oxygen (dissolved), pH, toxicity, and trash.[2]

**SHORT-TERM CONSTRUCTION IMPACTS**

Short-term impacts may result from the disturbance of on-site soils during construction activities. Runoff from the project site during construction would have the potential to violate water quality standards and water quality discharge requirements. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the *National Pollutant Discharge Elimination System (NPDES)* General Permit for Storm Water Discharges Associated with Construction *and Land Disturbance Activities* Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ). Construction activity subject to this permit includes clearing, grading, and other ground disturbances such as stockpiling, or excavation.

To obtain coverage under the Construction General Permit, the project must register with the Stormwater Multiple Application and Report Tracking System, as well as develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP is required to contain a site map(s) that depicts the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list Best Management Practices (BMPs) the discharger would implement to mitigate potential pollutants in stormwater runoff and the locations of those BMPs at the construction site. BMPs for construction activities may include measures to control pollutants at particular sources, such as fueling areas, trash storage areas, outdoor materials storage areas, and outdoor work areas. BMPs are also used during treatment of the pollutants at these particular source areas. The following BMPs could be implemented prior to construction to capture sediment, stabilize slopes, and prevent runoff and sediment from leaving the construction site, entering the City's storm drain system and entering receiving waters:

- Silt curtains,
- Erosion control fiber mats,
- Silt fences,
- Sandbag barriers, and
- Sediment traps.

In addition to the BMPs, the SWPPP must contain: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

The project's construction activity would be subject to the Construction General Permit, as it involves clearing, grading, and disturbances to the ground such as stockpiling or excavation, and a construction site with soil disturbance greater than one acre. The SWPPP is required to outline the erosion, sediment, and non-stormwater BMPs, in order to minimize the discharge of pollutants at the construction site. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sand bags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during

[1] California Waterboards, Los Angeles – R4. Revised March 2020. *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Available at: https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/. Accessed on August 5, 2020.

[2] California State Water Resources Control Board. Updated April 3, 2019. *Final 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List/305 (b) Report)* Available at: https://www.waterboards.ca.gov/water_issues/programs/tmdl/ integrated2014_2016.shtml. Accessed on August 5, 2020.

the project's construction phase would not violate any water quality standards. Compliance with the Construction General Permit would reduce short-term construction-related impacts to water quality to a less than significant level.

**LONG-TERM OPERATIONAL IMPACTS**

Long-term operation of the VA CBOC would similarly have the potential for impacting drainage systems due to pollutants in stormwater runoff (heavy metals, nutrients, and refuse) that could have the potential to affect tributary drainage features. The City of Ventura is an active participant in the Ventura Countywide Stormwater Programs including the Planning and Land Development Program, which requires pollutants in runoff generated on impervious surfaces be treated to the maximum extent prior to being released from development sites. Low-impact development strategies (post-construction best management practices) should be utilized to infiltrate, store, and reuse stormwater runoff whenever possible. In accordance with the Ventura County MS4 Permit requirements and NPDES Permit No. CAS063339, Order No. 94-082, a project-specific Water Quality Management Plan (WQMP) would be prepared for the project. The WQMP would identify structural and non-structural BMPs to minimize potential water quality issues related to low impact development (LID), hydromodification, identification of receiving waters, which would include but not be limited to, revegetation to stabilize disturbed soils, grading design that increases stormwater retention and infiltration, and maintenance programs to remove trash, debris, and waste.

- Implement minimum BMPs as applicable to the project, such as installing storm drain stencils and/or maintaining landscape with minimal pesticide use.

- Infiltration and Biotreatment BMPs (where technically feasible), such as infiltration trenches, infiltration basins, bioretention, biofiltration swales and/or biofiltration strips.

- Maintenance programs to remove trash, debris, and waste, such as installing adequate receptacles, weekly waste collection, and/or waste bag dispensers to ensure trash larger than five millimeters is not discharged to City's MS4.

The proposed site will be divided into three drainage subareas, each subarea will have a separate BMP to handle the water quality design volume. Subarea 1 includes the entire northern parking lot and would drain to multiple inlets and then flow towards two proposed infiltration basins. Subarea 2 includes the proposed clinic building. The building roof drains would outlet on the west side of the building and drain through a storm drain to an infiltration basin. Subarea 3 includes the southern parking lot. Stormwater would runoff across a zero-inch curb in the parking lot and into an infiltration trench. The proposed infiltration BMPs would be implemented in accordance with the Ventura County Technical Guidance Manual and would meet the City's MS4 requirements. An operation and maintenance manual would be developed by the applicant for permanent BMPs associated with the project. The applicant would be responsible for the routine BMP maintenance activities.

Following compliance with applicable laws and regulations, including preparation of a project-specific WQMP, and implementation of recommended BMPs, long-term water quality impacts would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

***Less Than Significant Impact.***

Based on the Basin Plan, the project site is located with the Mound Groundwater Basin. Sources of recharge to the Mound basin include underflow from adjacent basins (Santa Paula, Oxnard Plain, and Oxnard Forebay), mountain front recharge from the Ventura Foothills, irrigation return flow, and direct percolation of precipitation on the San

Pedro formation exposed along the basin's northern boundary. Sources of discharge from the Mound basin include groundwater production and outflow to the ocean. Based on the Geotechnical Study prepared for the project, groundwater depths range between 20 and 21 feet below ground surface (bgs) in the project area and generally flows west and south along the Santa Clara River.

**SHORT-TERM CONSTRUCTION IMPACTS**

The project would not have the potential to result in substantial impacts to groundwater supplies or recharge during construction. During the construction phase, ground disturbance is anticipated to reach a maximum of approximately five feet bgs along the majority of the site and a maximum of eight feet for footings. As groundwater is anticipated between 20 and 21 feet bgs, excavation required for the proposed project is not anticipated to encounter groundwater. However, should groundwater be encountered and dewatering be required, the project would be required to comply with Los Angeles RWQCB and NPDES Dewatering Permit regulations, both of which regulate the discharge of dewatering wastes from construction and other similar types of discharges that pose an insignificant (de minimis) threat to water quality. To obtain regulatory coverage under this order, an applicant must submit an NOI at least 45 days prior to discharge and basic information needed to characterize the dewatering discharge including a list of potential pollutants, maximum flow rates, and proposed treatment systems. A standard monitoring and reporting program is included as part of the permit. Adherence to existing NPDES requirements and acquisition of a Dewatering Permit would sufficiently mitigate short-term construction impacts in the events that groundwater is encountered during project construction. Impacts in this regard would be less than significant.

**LONG-TERM OPERATIONAL IMPACTS**

The proposed project would not include any land uses or facilities that would require groundwater extraction or have the capacity to substantially decrease groundwater supplies or recharge. The proposed project would generally include construction of a VA CBOC facility, parking lot, landscaping, and infiltration basins; refer to Section 2.4, *Project Characteristics*. While construction of the VA CBOC would result in an increase from 46 percent to 61.5 percent in impervious surface area at the project site (a total increase of 15.5 percent), the amount of impervious area would be nominal in compared to existing conditions and the proposed infiltration basins would allow for surface water detention and infiltration on-site. Thus, it is not anticipated that the nominal increase of impervious surface resulted from project implementation would impede percolation of runoff into the groundwater basin underneath the project area. The project would not have the capacity to substantially interfere with groundwater recharge, such that there would be a net deficit in aquifer volume or lowering of the groundwater table level during long-term operations. Long-term operational impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***c) 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:***

Based on the Hydrology Letter prepared for the project, surface water drains from the northeast corner to the southwest corner of the project site. As stated, runoff from the site drains towards the U.S. 101 east drain and eventually is tributary to the Santa Clara River and finally the Pacific Ocean.

The existing peak surface water runoff per acer conditions are shown in Table 4.10-4, *Existing Runoff Conditions*.

**Table 4.10-1**
**Existing Runoff Conditions**

| 25-Year Storm Event (cfs/ac) | 50-Year Storm Event (cfs/ac) | 100-Year Storm Event (cfs/ac) |
|---|---|---|
| 2.19 | 2.95 | 3.28 |

Notes: csf/ac = cubic feet per second per acre
Source: Jensen Design and Survey, Inc., *Preliminary Hydrology Letter*, February 17, 2020 (refer to Appendix G)

As shown in Table 4.10-1, existing peak runoff of 2.19 cubic feet per second per acre (cfs/ac) would occur during the 25-year storm event, 2.95 cfs/ac during the 50-year storm event, and 3.28 cfs/ac during the 100-year storm event.

***1) Result in substantial erosion or siltation on- or off-site?***

***Less Than Significant Impact.*** The proposed project would maintain the same overall drainage patterns and peak runoff flows. The proposed project would divide the site into three drainage subareas, each tributary to a separate infiltration and detention BMP handling the water quality design volume (WQDV). Table 4.10-2, *Peak Runoff with Basins*, below, shows the 25-, 50-, and 100-year peak runoff pre- and post-development for the project site.

**Table 4.10-2**
**Peak Runoff with Basins**

| | 25-Year Storm Event (cfs) | 50-Year Storm Event (cfs) | 100-Year Storm Event (cfs) |
|---|---|---|---|
| Subarea 1 | 9.0 | 10.6 | 13.5 |
| Subarea 2 | 3.5 | 4.7 | 5.2 |
| Subarea 3 | 4.1 | 6.3 | 7.0 |
| Total Post-Development | 16.7 | 21.6 | 25.8 |
| Existing Conditions | 17.5 | 23.6 | 26.2 |
| **Difference** | **-0.8** | **-2.0** | **-0.4** |

Notes: csf = cubic feet per second
Source: Jensen Design and Survey, Inc., *Preliminary Hydrology Letter*, February 17, 2020 (refer to Appendix G)

As shown in Table 4.10-2, the project would minimally decrease the peak runoff on-site during the 25-, 50-, and 100-year storm events. Since the project will be capturing surface water runoff on-site, the project would not result in substantial erosion or siltation on- or off-site. Further, as discussed in Response 4.10(a), short-term construction impacts to water quality would be minimized through compliance with the provisions of the NPDES Construction General Permit, which would require preparation of a SWPPP and recommended construction BMPs. Similarly, long-term operational impacts would be minimized through adherence to NPDES requirements to prepare a WQMP and implement recommended operational BMPs. These short-term construction and operational BMPs would minimize the potential for erosion or siltation on- or off-site during construction. Thus, the impact would be less than significant in this regard.

***Mitigation Measures:*** No mitigation is required.

***2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

***Less Than Significant Impact.*** Refer to Response 4.10(c)(1). The project would include infiltration/detention basins that would capture peak runoff on-site during the 25-, 50-, and 100-year storm events. The project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Thus, impacts in regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

***Less Than Significant Impact.*** Refer to Responses 4.10(a) through 4.10(c)(1), above. The project would not have the capacity to exceed capacity of storm water drainage systems as the project would include infiltration/detention basins that would capture peak runoff on-site during the 25-, 50-, and 100-year storm events. Water quality impacts would be minimized through compliance with NPDES regulations. Pursuant to NPDES requirements, a project-specific WQMP would be prepared to examine potential water quality issues related to LID, hydromodification, identification of receiving waters, and identification of necessary BMPs to minimize project impacts. Upon preparation of a WQMP and implementation of recommended BMPs, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***4) Impede or redirect flood flows?***

***Less Than Significant Impact.*** Refer to Response 4.10(c)(1), above. The project would include infiltration/detention basins that would capture peak runoff on-site during the 25-, 50-, and 100-year storm events. Further, the project would not result in any impacts to any flood control facilities within the area, including the Santa Clara River. Thus, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?***

***Less Than Significant Impact.*** A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank.

The project is situated approximately 2.8 miles from the Pacific Ocean and is not located in a tsunami inundation zone.[3] Risks associated with tsunami hazards are considered remote.

In regard to the potential for flooding hazards/seiche, according to the City's General Plan Figure 7-1, *Natural Hazards*, the project site is not located within a Flood Hazard Zone. Based on the General Plan EIR, the threat to the City from seiches is considered remote and the project site is not located near an enclosed body of water. Thus, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

[3] California Geologic Survey. CGS Information Warehouse: Tsunami. Available at https://maps.conservation.ca.gov/cgs/informationwarehouse/tsunami/. Accessed on August 5, 2020.

***e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

***Less Than Significant Impact.*** As discussed in Responses 4.10(a) and 4.10(b) above, the project would comply with NPDES and RWQCB requirements, and would not have the capacity to conflict with a water quality control plan or groundwater management plan for the region. Therefore, a less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

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# 4.11 LAND USE AND PLANNING

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Physically divide an established community? | | | | ✓ |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | | | | ✓ |

***a) Physically divide an established community?***

***No Impact.*** The proposed project would not result in impacts related to the division of an established community. Section 2.3, *Existing General Plan Land Uses and Zoning* discusses existing land use designations and zoning on-site and within the project area. The proposed project would not affect existing land use or zoning within the project area and would not have the potential to create a barrier between existing communities. This is currently occupied by a vacant former industrial use and represents an underutilized parcel within this portion of the City. The proposed project would result in a beneficial impact in this regard, since the project would provide a new VA CBOC on a vacant parcel that would serve as a primary care clinic for the local veteran population within the community. Thus, no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

***No Impact.*** As discussed under Response 4.11(a), the project would not conflict with or alter existing land use or zoning designations within project boundaries. The project site has a General Plan Land Use designation of "Industry," which is defined as encouraging intensive manufacturing, processing warehouses, and similar uses, as well as light, clean industries and support offices, also encouraging workplace-serving retail functions and work-live residences where such secondary functions would complement and be compatible with industrial uses. The proposed project is a clean industry with supporting offices and is anticipated to become an employment center. The project is zoned "Manufacturing Planned Development." The VA CBOC is an allowed use under the "Industry" land use designation and "Manufacturing Planned Development" zoning. A General Plan Amendment and Zone Change would not be required.

As shown in Table 4.11-1, *Manufacturing Planning Development Standards*, the project would adhere to the MPD standards. Project's consistency with the goals and objectives of the General Plan and Zoning Code, as well as applicable local, State, and Federal policies and regulations would ensure less than significant impacts would occur in this regard.

**Table 4.11-1**
**Manufacturing Planning Development Standards**

| MPD | Required/Allowed | Proposed Project |
|---|---|---|
| Front setback | • No less than 20 feet | • 228 feet[1] |
| Side yard setback | • 10 feet in interior sides, 20 feet on street sides of corner lots | • 82 feet[1] |
| Rear year setback | • Not less than 20 feet | • 111 feet[1] |
| Height | • Six stories not to exceed 75 feet | • One story, 29 feet 4 inches |
| Lot coverage | • 50 percent of total lot area | • 15.3 percent |
| Parking | • Office: One space per 300 gross square feet of floor area<br>• Manufacturing: One space per 500 gross square feet of floor area<br>• Other Uses (e.g. commercial: Ordinance Code, Section 24.415) | • One space per 158 gross square feet<br>• 339 parking spaces provided |
| Parking - Other | Bicycle<br>• Residential (Multi-Family): 10 percent of required vehicle spaces. No less than five spaces<br>• All other: none<br>General Use<br>• 10 percent minimum of required vehicle spaces<br>• Education Services: Same number of bicycle spaces as vehicle spaces<br>• Recreational Services: 30 percent minimum of required vehicle spaces<br>Carpool/Vanpool<br>• 10 percent minimum of required vehicle spaces for non-residential uses with an employment of 100 or more persons at a particular site | • 32 bicycle spaces<br>• 6 carpool/vanpool spaces |
| Access - Other | • Frontage on a public street | • Ralston Street and Walker Street |
| Landscaping – Other | • Minimum of 15 percent of the area shall be landscaped | • 32.2 percent |
| Notes:<br>[1] Measurements rounded to the nearest one. | | |

# 4.12 MINERAL RESOURCES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. 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? | | | | ✓ |
| b. 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? | | | | ✓ |

***a) 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 Impact.*** The California Department of Conservation's Surface Mining and Reclamation Act of 1975 (SMARA) identifies a range of Mineral Resource Zones (MRZ) within the State of California based on geologic and economic factors that identify the potential importance of mineral deposits in a particular area. MRZ-1 identifies areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. According to California Division of Mines and Geology, the project site is identified as MRZ-1.[1] No impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) 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.*** Refer to Response 4.12(a). Based on the General Plan, no mineral resource recovery occurs at the project site and no records of on-site historic mineral resource recovery exists.

***Mitigation Measures:*** No mitigation is required.

[1] California Division of Mines and Geology, *Special Report 145: Part III - Classification of the Sand, Gravel, and Crushed Rock Resource Areas, Western Ventura County Production-Consumption Region*, *Plate 1.9*, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_145/, published 1981, accessed April 14, 2020.

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# 4.13 NOISE

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | ✓ | |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | | | ✓ | |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | | ✓ |

## DESCRIPTION OF NOISE METRICS

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level ($L_{eq}$), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level ($L_{dn}$). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical $L_{dn}$ noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

## REGULATORY FRAMEWORK

### State of California

The State Office of Planning and Research (OPR) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of CNEL.

### City of Ventura

General Plan

The California Government Code requires that a noise element be included in the general plan of each county and city in the State. The 2005 Ventura General Plan (General Plan) *Chapter 7, Our Health & Safe Community* provides a description of existing and projected future noise levels, and incorporates comprehensive goals, policies, and implementing actions to ensure that the City of Ventura (City) residents are protected from excessive noise. The applicable actions and policies to minimize the harmful effects of noise obtained from the General Plan are as follows:

Policy 7E: Minimize the harmful effects of noise.

Action 7.32: Require acoustical analyses for new residential developments within the mapped 60 decibel (dBA) CNEL contour, or within any area designated for commercial or industrial use, and require mitigation necessary to ensure that:

- Exterior noise in exterior spaces of new residences and other noise sensitive uses that are used for recreation (such as patios and gardens) does not exceed 65 dBA CNEL, and
- Interior noise in habitable rooms of new residences does not exceed 45 dBA CNEL with all windows closed.

Action 7.33: As funding becomes available, construct sound walls along U.S. 101, SR 126, and SR 33 in areas where existing residences are exposed to exterior noise exceeding 65 dBA CNEL.

Action 7.34: Request that sound levels associated with concerts at the County Fairgrounds be limited to 70 dBA at the eastern edge of that property.

Action 7.35: Request the termination of auto racing at the County fairgrounds.

Action 7.36: Amend the noise ordinance to restrict leaf blowing, amplified music, trash collection, and other activities that generate complaints.

Action 7.37: Use rubberized asphalt or other sound reducing material for paving and re-paving of City streets.

*Action 7.38: Update the Noise Ordinance to provide standards for residential projects and residential components of mixed-use projects within commercial and industrial districts.*

The General Plan also provides noise standards for acceptable conditions based on State recommendations and City land use designations. The City uses the noise/land use compatibility guidelines presented in Table 4.13-1, *Land Use Compatibility for Community Noise Exposure*. These standards, which use the CNEL noise descriptor, are intended to be applicable for land use designations exposed to noise levels generated by transportation-related sources.

**Table 4.13-1**
**Land Use Compatibility for Community Noise Exposure**

| Land Use Category | Community Noise Exposure ($L_{dn}$ or CNEL) | | | |
|---|---|---|---|---|
| | Normally Acceptable | Conditionally Acceptable | Normally Unacceptable | Clearly Unacceptable |
| Residential – Low Density Single Family, Duplex, Mobile Homes | 50 - 60 | 55 - 70 | 70 - 75 | 75 - 85 |
| Residential – Multi-Family | 50 - 65 | 60 - 70 | 70 - 75 | 75 - 85 |
| Transient Lodging - Motel, Hotels | 50 - 65 | 60 - 70 | 70 - 80 | 80 - 85 |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 50 - 65 | 60 - 70 | 70 - 80 | 80 - 85 |
| Auditoriums, Concert Halls, Amphitheaters | NA | 50 - 70 | 65 - 85 | NA |
| Sports Arenas, Outdoor Spectator Sports | NA | 50 - 75 | 70 - 85 | NA |
| Playgrounds, Neighborhood Parks | 50 - 70 | NA | 67.5 - 75 | 72.5 - 85 |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 50 - 75 | NA | 70 - 80 | 80 - 85 |
| Office Buildings, Business Commercial and Professional | 50 – 70 | 67.5 - 77.5 | 75 - 85 | NA |
| Industrial, Manufacturing, Utilities, Agriculture | 50 – 75 | 70 - 80 | 80 - 85 | NA |

Notes: NA = Not Applicable, $L_{dn}$ = Day-Night Sound Level, CNEL = Community Noise Equivalent Level
Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable – New construction or development should generally not be undertaken.

Source: City of San Buenaventura 2005 Ventura General Plan, *Table 7-2 Acceptable Noise Levels*, 2005; State of California Governor's Office of Planning and Research, General Plan Guidelines, July 2017.

## Municipal Code

Municipal Code Chapter 10.650, *Noise Control*, contains the City's noise control regulations. The following sections of the Municipal Code are applicable to the proposed project:

*Section 10.650.130. - Designated noise zones.*

*A. Assignment of noise zones. Receiving properties are assigned to designated noise zones as follows:*
*1. Designated noise zone I: Noise sensitive properties.*
*2. Designated noise zone II: Residential properties.*
*3. Designated noise zone III: Commercial properties.*
*4. Designated noise zone IV: Industrial and agricultural properties.*

*B. Exterior noise levels.*

*1. Noise zone exterior noise levels. The following exterior noise levels (Table 4.13-2, Exterior Noise Level Standards), unless otherwise specifically indicated, shall apply to all receiving properties within a designated noise zone for the purpose of establishing noise level limits in subsection B.2. below:*

**Table 4.13-2**
**Exterior Noise Level Standards**

| | Designated Zone | Time Interval | Exterior Noise Levels |
|---|---|---|---|
| Zone I | Noise sensitive properties | 7 a.m.—10 p.m. | 50 |
| | | 10 p.m.—7 a.m. | 45 |
| Zone II | Residential properties | 7 a.m.—10 p.m. | 50 |
| | | 10 p.m.—7 a.m. | 45 |
| Zone III | Commercial properties | 7 a.m.—10 p.m. | 60 |
| | | 10 p.m.—7 a.m. | 55 |
| Zone IV | Industrial and agricultural | Anytime | 70 |

*2. Noise level limits. Unless otherwise provided in this article, no person shall operate or cause to be operated any source of sound at any location within the city, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level when measured on any receiving property to exceed the following noise level limits:*
*(a) The exterior noise levels for that land use, as specified in subsection B.1. above, for a total period of more than 30 minutes in any consecutive 60 minutes;*
*(b) The exterior noise levels plus five dB for a total period of more than 15 minutes in any consecutive 60 minutes;*
*(c) The exterior noise levels plus ten dB for a total period of more than five minutes in any consecutive 60 minutes; or*
*(d) The exterior noise levels plus 15 dB for a total period of more than one minute in any consecutive 60 minutes; or*
*(e) The exterior noise levels plus 20 dB for any period of time.*

*3. Intrusive noise measurement duration. It shall be sufficient for the noise level limits in sections 2.(a), (b), (c) and (d), above, to be measured for no less than one minute of any portion of the periods stated in subsections 2.(a), (b), (c) and (d), provided that any witness to the intrusive noise can testify to the fact that the intrusive noise continued at the same level or greater level than the level measured by the enforcing officer for a period in excess of the period allowed in subsections 2.(a), (b), (c) and (d).*

*4. Ambient noise level in excess of noise level limit. If the ambient noise level exceeds that permissible for any of the noise level limits in subsections (a), (b), (c) and (d) of subsection 2. above, the noise level limit shall be increased in five dB increments as appropriate to encompass or reflect said ambient noise level. In the event the ambient noise level exceeds the noise level limit in subsection 2.(e) above, this limit shall be increased to the maximum ambient noise level.*

*5. Boundary between different zones. If the measurement location is on a boundary between two different designated noise zones, the lower noise level limit applicable to the two zones shall apply.*

*Section 10.650.150. - Special noise sources.*

*D. Construction of buildings and structures.*

*1. Between the hours of 8:00 p.m. of one day and 7:00 a.m. of the next, no person adjacent to or within any residential zone in the city shall operate power construction equipment or tools or perform any outside construction or repair work on buildings or structures, or operate any pile driver, steam shovel, pneumatic hammer, steam or electric hoist or other construction device so as to create any noise which exceeds the noise level limits of this article. These specified construction activities are permitted between the hours of 7:00 a.m. and 8:00 p.m. The performance of emergency work is exempt from the provisions of this section.*

*2. The planning commission and city council shall retain the right to impose more restrictive hours of construction upon any projects involving construction activity by adding appropriate conditions to the city's approval of subdivisions, planned development permits, conditional use permits, variances and other projects.*

## EXISTING CONDITIONS

### Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. The nearest sensitive receptors are multi-family residential development located approximately 100 feet to the north of the project site across Ralston Street.

### Existing Stationary Sources

The project area is located within an urbanized area. The primary sources of stationary noise in the project vicinity are urban-related activities (i.e., mechanical equipment, commercial areas, parking areas, and pedestrians). The noise associated with these sources may represent a single-event noise occurrence or short-term or long-term continuous noise.

### Existing Mobile Sources

The majority of the existing noise in the project area is generated from vehicles traveling along U.S. 101, Ralston Street, and Saratoga Avenue. According to the General Plan, the project site is located within traffic noise contour zones with 65 to 70 dBA CNEL along Walker Street/U.S. 101.[1]

### Existing Ambient Noise Levels

On March 19, 2020, California Governor Gavin Newsom passed Executive Order N-33-20 in response to the growing spread of COVID-19.[2] Executive Order N-33-30 requires that all individuals living in the State stay at home or at their

[1] City of San Buenaventura, 2005 Ventura General Plan, *Figure 7-3 Noise Contours*, adopted August 8, 2005.
[2] COVID-19 stands for Coronavirus Disease 2019, a quickly spreading global viral infection that causes mild upper respiratory tract illnesses and in some cases death.

place of residence, except as needed to maintain continuity of the operations of the Federal critical infrastructure. As such, on-site noise measurements while Executive Order N-33-20 is active would not correctly reflect the typical ambient noise level near the project site. Thus, in order to assess ambient noise levels, existing ambient noise levels from mobile sources were modeled using the Federal Highway Administration's Highway Noise Prediction Model (FHWA RD-77-108). The RD-77-108 model calculates the average noise level at specific locations based on traffic volumes, average speeds represented by the posted speed limit, roadway geometry, and site environmental conditions.

The majority of vehicular traffic near the project site are along U.S. 101, Ralston Street, and Saratoga Avenue. These roadways generate the majority of existing noise in the immediate project vicinity. Noise projections are based on modeled vehicular traffic as derived from the *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020); refer to Appendix E, *Noise Modeling Data*, for modeling assumptions and vehicle speeds along the roadway segments. As shown in Table 4.13-3, *Existing Ambient Noise Levels*, existing ambient noise levels from mobile sources in the vicinity of the project site range from 52.2 to 77.3 dBA CNEL at 100 feet from roadway centerline.

**Table 4.13-3**
**Existing Ambient Noise Levels**

| Roadway Segment | Existing Conditions | | | | |
|---|---|---|---|---|---|
| | ADT | dBA @ 100 Feet from Roadway Centerline | Distance from Roadway Centerline to: (Feet) | | |
| | | | 70 CNEL Noise Contour | 65 CNEL Noise Contour | 60 CNEL Noise Contour |
| U.S. 101 South of Telephone Road | 125,000 | 77.3 | 309 | 665 | 1,434 |
| Saratoga Avenue | 3,800 | 52.2 | - | - | - |
| Ralston Street | 11,100 | 59.3 | - | 42 | 90 |
| Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level, - = contour is located within the roadway right-of-way | | | | | |
| Source: Noise modeling is based on traffic data from the *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020)*. Refer to Appendix E for modeling assumptions. | | | | | |

***a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

***Less Than Significant Impact.***

**CONSTRUCTION NOISE IMPACTS**

Construction of the proposed project would occur over approximately 13 months and would include demolition, grading, building construction, paving, and architectural coating phases. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table 4.13-4, *Maximum Noise Levels Generated by Typical Construction Equipment*. It should be noted that the noise levels identified in Table 4.13-4 are maximum sound levels ($L_{max}$), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which

would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

**Table 4.13-4**
**Maximum Noise Levels Generated by Typical Construction Equipment**

| Type of Equipment | Acoustical Use Factor[1] | $L_{max}$ at 50 Feet (dBA) |
|---|---|---|
| Concrete Saw | 20 | 90 |
| Crane | 16 | 81 |
| Concrete Mixer Truck | 40 | 79 |
| Backhoe | 40 | 78 |
| Dozer | 40 | 82 |
| Excavator | 40 | 81 |
| Forklift | 40 | 78 |
| Paver | 50 | 77 |
| Roller | 20 | 80 |
| Tractor | 40 | 84 |
| Water Truck | 40 | 80 |
| Grader | 40 | 85 |
| General Industrial Equipment | 50 | 85 |

Note: $L_{max}$ = maximum noise levels; dBA = A-weighted decibel
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

The potential for construction-related noise to affect nearby sensitive receptors would depend on the location and proximity of construction activities to these receptors. The closest sensitive receptors are multi-family residential development located approximately 100 feet to the north of the project site. Construction would occur throughout the project site and would not be concentrated or confined in the area directly adjacent to sensitive receptors. In addition, construction noise at the nearest sensitive receptors would be masked by the traffic noise from Ralston Street. It should also be noted that the noise levels depicted in Table 4.13-4 are $L_{max}$, or maximum noise levels, which would occur sporadically when construction equipment is operated in proximity to sensitive receptors.

Pursuant to the City's Municipal Code Section 10.650.150.D, construction activities of the project would occur between the hours of 7:00 a.m. and 8:00 p.m. These permitted hours of construction are included in the Municipal Code in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption. The City does not establish noise level standards for construction activities occurring within the permitted hours. Given the sporadic and variable nature of proposed project construction and the implementation of time limits specified in the Municipal Code, short-term construction noise impacts would be less than significant.

## OPERATIONS

### Mobile Noise Impacts

According to the *Highway Traffic Noise: Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear.[3] Based on the Traffic Impact Analysis, the proposed project is projected to generate a net increase of 1,576 daily trips, which includes 124 a.m. peak hour trips and 140 p.m. peak hour trips. The traffic noise levels under "Existing Without

[3] Federal Highway Administration, *Highway Traffic Noise: Analysis and Abatement Policy and Guidance*, December 2011.

Project" and "Existing With Project" scenarios are compared in Table 4.13-5, *Modeled Existing and Existing Plus Project Traffic Noise Levels*. As shown under the "Existing Without Project" scenario, noise levels would range from approximately 52.2 dBA to 77.3 dBA at 100 feet from roadway centerline, with the highest noise levels occurring along U.S. 101 South of Telephone Road. The "Existing With Project" scenario noise levels would range from approximately 52.5 dBA to 77.3 dBA at 100 feet from roadway centerline, with the highest noise levels also occurring along U.S. 101 South of Telephone Road.

**Table 4.13-5**
**Modeled Existing and Existing Plus Project Traffic Noise Levels**

| Roadway Segment | Existing Without Project | | | | | Existing With Project | | | | | Difference In dBA @ 100 Feet from Roadway Centerline |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | ADT | dBA @ 100 Feet from Roadway Centerline | Distance from Roadway Centerline to: (Feet) | | | ADT | dBA @ 100 Feet from Roadway Centerline | Distance from Roadway Centerline to: (Feet) | | | |
| | | | 70 CNEL Noise Contour | 65 CNEL Noise Contour | 60 CNEL Noise Contour | | | 70 CNEL Noise Contour | 65 CNEL Noise Contour | 60 CNEL Noise Contour | |
| U.S. 101 South of Telephone Road | 125,000 | 77.3 | 309 | 665 | 1,434 | 125,100 | 77.3 | 309 | 666 | 1,434 | 0.0 |
| U.S. 101 North of Telephone Road | 96,000 | 75.9 | 249 | 536 | 1,156 | 96,200 | 76.0 | 249 | 537 | 1,157 | 0.0 |
| CA 126 West of Victoria Avenue | 47,000 | 72.6 | 150 | 323 | 695 | 47,000 | 72.6 | 150 | 323 | 695 | 0.0 |
| CA 126 East of Victoria Avenue | 46,000 | 72.5 | 148 | 318 | 685 | 46,200 | 72.6 | 148 | 319 | 687 | 0.0 |
| Telephone Road West of Portola Road | 32,500 | 65.8 | - | 112 | 242 | 32,900 | 65.8 | - | 113 | 244 | 0.1 |
| Telephone Road Between Portola Road and Saratoga Avenue | 22,500 | 64.1 | - | 88 | 189 | 22,600 | 64.2 | - | 88 | 189 | 0.0 |
| Telephone Road Between Saratoga Avenue and Victoria Avenue | 28,400 | 65.2 | - | 103 | 221 | 28,600 | 65.2 | - | 103 | 222 | 0.0 |
| Telephone Road East of Victoria Avenue | 29,200 | 65.3 | - | 105 | 225 | 29,300 | 65.3 | - | 105 | 226 | 0.0 |
| Portola Road North of Telephone Avenue | 5,500 | 57.8 | - | - | 71 | 5,500 | 57.8 | - | - | 71 | 0.0 |
| Portola Road South of Telephone Avenue | 7,700 | 59.1 | - | 40 | 87 | 8,200 | 59.3 | - | 42 | 90 | 0.3 |
| Victoria Avenue North of Telephone Road | 42,600 | 67.3 | - | 143 | 309 | 42,600 | 67.3 | - | 143 | 309 | 0.0 |
| Victoria Avenue Between Telephone Road and Ralston Street | 46,900 | 67.8 | - | 153 | 329 | 47,000 | 67.8 | - | 153 | 330 | 0.0 |
| Victoria Avenue Between Ralston Street and Moon Drive | 47,500 | 67.8 | - | 154 | 332 | 47,500 | 67.8 | - | 154 | 332 | 0.0 |
| Victoria Avenue South of Moon Drive | 46,000 | 67.7 | - | 151 | 325 | 46,300 | 67.7 | - | 152 | 327 | 0.0 |
| Saratoga Avenue | 3,800 | 52.2 | - | - | - | 4,100 | 52.5 | - | - | - | 0.3 |
| Ralston Street | 11,100 | 59.3 | - | 42 | 90 | 11,300 | 59.4 | - | 42 | 92 | 0.1 |

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level; - = Contour is located within the roadway right-of-way.

Source: Noise modeling is based on traffic data within *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020). Refer to Appendix E for modeling assumptions.

Table 4.13-5 also shows the traffic noise level differences between the "Existing Without Project" scenario and the "Existing With Project" scenario. The proposed project would result in a maximum noise level increase of 0.3 dBA along Saratoga Street and Portola Road South of Telephone Avenue. Therefore, the proposed project would not

significantly increase noise levels along the roadway segments analyzed (i.e., noise increase would be less than 3.0 dBA) and the impact would be less than significant.

**Cumulative Mobile Source Impacts**

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the proposed project and other projects in the vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of project area buildout to the future cumulative base traffic volumes in the project area and the vicinity.

The combined effect compares the "General Plan Buildout (2025) With Project" condition to existing conditions. This comparison accounts for the traffic noise increase generated by a project combined with the traffic noise increase generated by cumulative projects. The following criteria have been utilized to evaluate the combined effect of cumulative noise increase.

- *Combined Effect*. The cumulative with project noise level ("General Plan Buildout (2025) With Project" condition) would cause a significant cumulative impact if a 3 dBA increase over existing conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use. Although there may be a significant noise increase due to the proposed project in combination with other related projects, it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. The following criteria have been utilized to evaluate the incremental effect of the cumulative noise increase.

- *Incremental Effects*. The "General Plan Buildout (2025) With Project" condition causes a 1 dBA increase in noise above the "General Plan Buildout (2025) Without Project" condition noise level.

A significant impact would result only if both the combined (including an exceedance of the applicable exterior standard at a sensitive use) and incremental effects criteria have been exceeded. Noise, by definition, is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed project and growth due to occur in the site vicinity would contribute to cumulative noise impacts. Table 4.13-6, *Cumulative Traffic Noise Levels*, lists the traffic noise effects along roadway segments in the project vicinity for "Existing", "General Plan Buildout (2025) Without Project," and "General Plan Buildout (2025) With Project" conditions, including combined and incremental impacts. Residential uses are located along all study area roadways. However, even though the City's exterior noise level standards for residential uses of 50 dBA during daytime and 45 dBA during nighttime would be exceed on all study area roadways under existing and future conditions, as indicated in Table 4.13-6, the "Combined Effects" criterion of 3 dBA and the "Incremental Effects" criterion of 1 dBA would not be exceeded along any of the study area roadways. Therefore, the proposed project would result in less than significant impacts in this regard.

**Table 4.13-6**
**Cumulative Traffic Noise Levels**

| Roadway Segment | dBA @ 100 Feet from Roadway Centerline | | | Combined Effects | Incremental Effects | Cumulatively Significant Impact?[1] |
|---|---|---|---|---|---|---|
| | Existing | General Plan Buildout (2025) Without Project | General Plan Buildout (2025) With Project | Difference in dBA Between Cumulative With Project and Existing | Difference in dBA Between Cumulative With Project and Cumulative Without Project | |
| U.S. 101 South of Telephone Road | 77.3 | 78.1 | 78.1 | 0.7 | 0.0 | No |
| U.S. 101 North of Telephone Road | 75.9 | 76.7 | 76.7 | 0.8 | 0.0 | No |
| CA 126 West of Victoria Avenue | 72.6 | 72.9 | 72.9 | 0.3 | 0.0 | No |
| CA 126 East of Victoria Avenue | 72.5 | 73.5 | 73.6 | 1.0 | 0.0 | No |
| Telephone Road West of Portola Road | 65.8 | 65.8 | 65.9 | 0.1 | 0.1 | No |
| Telephone Road Between Portola Road and Saratoga Avenue | 64.1 | 64.9 | 64.9 | 0.8 | 0.0 | No |
| Telephone Road Between Saratoga Avenue and Victoria Avenue | 65.2 | 65.7 | 65.7 | 0.5 | 0.0 | No |
| Telephone Road East of Victoria Avenue | 65.3 | 65.3 | 65.3 | 0.0 | 0.0 | No |
| Portola Road North of Telephone Avenue | 57.8 | 58.2 | 58.2 | 0.4 | 0.0 | No |
| Portola Road South of Telephone Avenue | 59.1 | 59.7 | 60.0 | 0.9 | 0.2 | No |
| Victoria Avenue North of Telephone Road | 67.3 | 68.0 | 68.0 | 0.7 | 0.0 | No |
| Victoria Avenue Between Telephone Road and Ralston Street | 67.8 | 68.0 | 68.1 | 0.3 | 0.0 | No |
| Victoria Avenue Between Ralston Street and Moon Drive | 67.8 | 68.4 | 68.4 | 0.6 | 0.0 | No |
| Victoria Avenue South of Moon Drive | 67.7 | 68.3 | 68.3 | 0.6 | 0.0 | No |
| Saratoga Avenue | 52.2 | 53.3 | 53.6 | 1.4 | 0.3 | No |
| Ralston Street | 59.3 | 59.3 | 59.4 | 0.0 | 0.1 | No |

Notes: dBA = A-weighted decibel
1. A cumulative impact would occur if the "Combined Effects" and "Incremental Effects" criterion are exceeded, and the modeled noise level exceeds the City's exterior noise standard shown in Table 4.13-2.

Source: Noise modeling is based on traffic data within *Veterans Affairs Community-Based Outpatient Clinic (VA CBOC) Project Draft Traffic and Circulation Study* (Traffic Impact Analysis) prepared by Stantec (dated July 22, 2020). Refer to Appendix E for modeling assumptions.

### Stationary Noise Impacts

### Mechanical Equipment

Heating, ventilation, and air conditioning (HVAC) units would be installed on the roof of the proposed building. Typically, mechanical equipment noise is 55 dBA at 50 feet from the source. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. HVAC units would be located in the middle of the proposed building rooftop approximately 350 feet from the nearest sensitive receptor (i.e. residences to the north of the project site). As such, noise levels from the HVAC units could reach approximately 38 dBA at the nearest residences to the north without an enclosure or noise attenuation features. The HVAC units would be shielded by a mechanical screen wall and a parapet wall which would further attenuate operational noise from the HVAC units. Therefore, the City's exterior daytime (50 dBA) and nighttime (45 dBA) noise standards for residential uses would not be exceeded as a result of HVAC units at the project site. Thus, a less than significant impact would occur in this regard.

### Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-

sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table 4.13-7, *Typical Noise Levels Generated by Parking Lots*. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 48 feet for normal speech to 50 dBA at 50 feet for very loud speech.

**Table 4.13-7**
**Typical Noise Levels Generated by Parking Lots**

| Noise Source | Maximum Noise Levels at 50 Feet from Source |
|---|---|
| Car door slamming | 61 dBA $L_{eq}$ |
| Car starting | 60 dBA $L_{eq}$ |
| Car idling | 53 dBA $L_{eq}$ |

Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

The project would provide 339 parking spaces in a surface parking lot. As shown in Table 4.13-7, parking lot noise levels could range between 53 dBA and 61 dBA at 50 feet. Since the parking lot noise levels would be instantaneous compared to the land use compatibility noise standards in the CNEL scale, which are averaged over time, actual noise levels over time resulting from parking lot activities would be far lower. Parking lot would be located near the northern boundary of the project site approximately 130 feet from the nearest sensitive receptor (i.e. residences to the north of the project site). As such, noise levels from the parking lot could reach approximately 53 dBA at the nearest residences. According to the City's Municipal Code Section 10.650.130 Subsection B.2, a 5 dBA shall be added to the exterior noise standards for noise lasting for a total period of less than 15 minutes in any consecutive 60 minutes, which is applicable to the sporadically nature of parking lot activities. Therefore, the City's exterior daytime (50 dBA + 5 dBA = 55 dBA) noise standard for residential uses would not be exceeded as a result of the parking lot at the project site. Since the project would be operational during weekday daytime hours (7:00 a.m. to 5:00 p.m.) and no parking lot activities would be expected during nighttime, the City's exterior nighttime noise standard would not apply. Therefore, noise impacts from parking lots would be less than significant.

***Mitigation Measures*:** No mitigation measures are required.

***b) Generation of excessive groundborne vibration or groundborne noise levels?***

***Less Than Significant Impact.***

**CONSTRUCTION**

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. For most commercial and industrial structures that are engineered concrete and masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.3 inches per second (in/sec). For most residential structures that are non-engineered timber and

masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.2 in/sec. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The vibration produced by construction equipment is illustrated in Table 4.13-8, *Typical Vibration Levels for Construction Equipment*.

**Table 4.13-8**
**Typical Vibration Levels for Construction Equipment**

| Equipment | Approximate peak particle velocity at 25 feet (inches/second)[1] | Approximate peak particle velocity at 90 feet (inches/second) |
|---|---|---|
| Large bulldozer | 0.089 | 0.013 |
| Loaded trucks | 0.076 | 0.011 |
| Small bulldozer | 0.003 | <0.001 |
| Jackhammer | 0.035 | 0.005 |

Notes:
1. Calculated using the following formula:

$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Groundborne vibration decreases rapidly with distance. The nearest structures are commercial buildings located approximately 90 feet to the east of the project site and residential buildings located approximately 100 feet to the north of the project site. As indicated in Table 4.13-8, based on the FTA data, vibration velocities from typical heavy construction equipment operation that would be used during project construction range from less than 0.001 to 0.013 in/sec peak particle velocity (PPV) at 90 feet from the source of activity. In addition, the project would not require pile driving activities and would not utilize heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, large bulldozers, and jackhammers) near off-site uses or nearby structures. Therefore, construction activities would not be capable of exceeding the 0.3 in/sec or 0.2 in/sec PPV significance threshold for vibration and a less than significant impact would occur in this regard.

**OPERATIONS**

The project proposes to build a clinic building, which would not generate groundborne vibration that could be felt at surrounding uses. The proposed project would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. No impact would occur in this regard.

***Mitigation Measures*:** No mitigation measures are required.

***c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

***No Impact*.** The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the Oxnard Airport, located approximately 3.7 miles to the south of the project site at 2889 W 5th Street in the City of Oxnard. According to the

Ventura County Airport Land Use Commission, the project site is not located within an airport land use plan.[4] Therefore, project implementation would not introduce a safety hazard for people residing or working in the project area. No impact would occur.

***Mitigation Measures:*** No mitigation measures are required.

[4] Ventura County Airport Land Use Commission, *Airport Comprehensive Land Use Plan Update for Ventura County*, *Exhibit 3A, Oxnard Airport Study Area and Jurisdictional Boundaries*, adopted July 7, 2000.

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# 4.14 POPULATION AND HOUSING

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | ✓ | |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | ✓ |

***a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

***Less Than Significant Impact.*** No residential uses would be developed as part of the project. Therefore, the project would not induce direct population growth in the City through new housing development.

The proposed project would involve the construction of approximately 51,000 square feet of building area, which is anticipated to employ 115 employees and would therefore increase daytime employee population within the area. The employment created by the proposed project has the potential to result in an indirect growth in the City's population, since the potential exists that "future employees" (and their families) may choose to relocate to the City. Estimating the number of these future employees who would choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Additionally, housing opportunities exist for the project's future employees in the communities surrounding the City. Thus, project implementation is not anticipated to induce substantial population growth within the City either directly or indirectly. The project represents the redevelopment of an existing industrial facility, and would not result in the construction of new infrastructure that would eliminate a barrier to growth. As such, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

***b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

***No Impact.*** No housing would be affected by the proposed project. No impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

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# 4.15 PUBLIC SERVICES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| 1) Fire protection? | | | ✓ | |
| 2) Police protection? | | | ✓ | |
| 3) Schools? | | | ✓ | |
| 4) Parks? | | | ✓ | |
| 5) Other public facilities? | | | ✓ | |

***a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

***1) Fire protection?***

***Less Than Significant Impact.*** The Ventura City Fire Department (Fire Department) provides fire protection and emergency response services to the City. There are six fire stations within the City's limits, all of which are equipped with an engine company. Additionally, Ventura Fire Station 5 houses a paramedic truck company. The emergency response time standard for the Fire Department is five minutes.[1] The nearest station to the project site is Ventura Fire State 5, located at 4225 East Main Street, approximately 0.84 miles northwest of the project site.

The proposed project could create an increased demand for fire protection services. However, as a VA CBOC facility, the proposed project would not induce unplanned population growth as it would be consistent with General Plan designation and zoning for the site; refer to Section 4.11, *Land Use and Planning*. Thus, the project would not create a substantial demand for fire protection services or require the construction of new fire protection facilities.

Further, the overall project design would be subject to compliance with the fire prevention requirements set forth in the 2019 California Fire Code (CFC), 2019 California Building Standards Code (CBC), and the Municipal Code, Division 12 *Building and Construction Regulations* and Division 14 *Fire and Hazardous Material Regulations*, and would require site plan review by the Ventura City Fire Department in accordance with General Plan Action 7.12. Policy 7C, *Optimize Firefighting and Emergency Response Capacities*, of the General Plan includes Action 7.12, which would assure the project includes adequate structure fire protection, access for firefighting, water supply, and vegetation clearance; and Action 7.13, which would ensure that the Ventura City Fire Department is working towards resolving extended response time by adding or relocating fire stations, increasing firefighting and support staff resources, reviewing and conditioning

[1] City of Ventura, *Fire Stations*, https://www.cityofventura.ca.gov/1654/Fire-Stations, accessed April 17, 2020.

annexations and development applications, and require funding of new services from fees, assessments, or taxes as new subdivisions are developed. As such, a less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***2) Police protection?***

***Less Than Significant Impact.*** The Ventura Police Department (VPD) provides police protection services to the City. The VPD currently employs 192 full-time staff members; 143 of which are sworn officers and 49 are full-time professional staff.[2] On average, the VPD processes over 90,000 calls for service a year and approximately 40,000 reports.[3] The VPD response time standard for priority one calls (emergencies and in progress crimes) is five minutes 90 percent of the time.[4] The City is divided into four Police Beats, or areas of responsibility, and the project site is located in Beat 4, Reporting District 78.[5] The nearest police station is the Ventura Police Department located at 1425 Dowell Drive, approximately 0.1-mile northwest of the project site.

As discussed in Response 4.15 (a)(1) above, the proposed project is consistent with land uses designated for the site and would not induce unplanned population growth. Thus, implementation of the project would not substantially increase demand for police protection services provided by the VPD or require construction of new police protection facilities. In addition, the project would be subject to site plan review by the City prior to project approval to ensure that it meets City requirements in regard to safety (e.g., nighttime security lighting). As such, a less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***3) Schools?***

***Less Than Significant Impact.*** The Ventura Unified School District (VUSD) provides public school education to the project area. The project area is served by the Elmhurst Elementary School, located at 5080 Elmhurst Street, approximately 0.82-mile northwest of the project site; the Anacapa Middle School, located at 100 South Mills Road, approximately 1.63 miles northwest; and the Ventura High School, located at 2 North Catalina Street, approximately 2.83 miles northwest.[6]

The project includes the development of a new VA CBOC facility, which is not anticipated to generate unplanned population growth resulting in increased attendance at the local schools serving the project area; refer to Section 4.14. The project is consistent with designated land uses for the site and would not substantially increase the need for school facilities. Furthermore, the project would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new residential projects. According to Section 65996 of the California Government Code, payment of statutory fees is considered full mitigation for new development projects. Thus, it is not anticipated that the proposed project would result in substantial demand for school services or require the construction of new school facilities. Upon payment of required fees by the project Applicant consistent with existing State requirements, impacts in this regard would be less than significant.

***Mitigation Measures:*** No mitigation is required.

[2] City of Ventura Police Department, *About The VPD*, https://www.cityofventura.ca.gov/950/About-The-VPD, accessed April 17, 2020.
[3] Ibid.
[4] City of Ventura Police Department, *Performance Measures*, https://www.cityofventura.ca.gov/1053/Performance-Measures, accessed April 17, 2020.
[5] City of Ventura GIS, *Ventura Police CFS Website*, https://map.cityofventura.net/flex/policemap/, accesses April 17, 2020.
[6] Ventura Unified School District, *My School Locator*, https://locator.decisioninsite.com/?StudyID=196118, accessed April 17, 2020.

***4) Parks?***

***Less Than Significant Impact.*** The Parks/Recreation and Community Partnerships Department operates 46 parks and recreational facilities within the City, including historic sites, community gardens, community centers, and golf courses.[7]

The project does not propose new or physically altered parks or recreational facilities. As discussed above, the proposed project is consistent with land uses designated for the site and would not result in unplanned population growth. Implementation of the project would not increase the demand for, or use of, existing local or regional park facilities. A less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***5) Other public facilities?***

***Less Than Significant Impact.*** The City of Ventura has three public libraries, including the Hill Road Library, the E.P. Foster Library, and the Avenue Library, all administered and staffed by the larger Ventura County Library System.[8] The nearest library to the project site is the Hill Road Library, located approximately 0.9-mile northeast of the site at 1070 South Hill Road.

As the proposed project would not result in any unplanned growth, the project's increase in demand for other public facilities, such as libraries, would not be substantial. A less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

[7] City of Ventura, *Parks & Recreation Facilities (map)*, https://ca-ventura.civicplus.com/DocumentCenter/View/6227/Parks-Map-2017-lettersize?bidId=, accessed April 17, 2020.
[8] City of Ventura, *Library Services*, https://www.cityofventura.ca.gov/681/Library-Services, accessed April 27, 2020.

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# 4.16 RECREATION

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Would the project 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? | | | ✓ | |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | ✓ | |

***a) Would the project 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?***

***Less Than Significant Impact.*** As discussed in Response 4.15(a)(4), the proposed project is consistent with land uses designated for the site and would not result in unplanned population growth. The project does not propose new or physically altered parks or recreational facilities and would not increase the demand for, or use of, existing neighborhood and regional parks or other recreation facilities. A less than significant impact would occur in this regard

***Mitigation Measures:*** No mitigation is required.

***b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

***Less Than Significant Impact.*** Refer to Response 4.16(a).

***Mitigation Measures:*** No mitigation is required.

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# 4.17 TRANSPORTATION/TRAFFIC

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | | | ✓ | |
| b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | | | ✓ | |
| c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | ✓ | | |
| d. Result in inadequate emergency access? | | | | ✓ |

This section is primarily based upon the *Traffic and Circulation Study* (Traffic Study), prepared by Stantec, dated July 22, 2020 (refer to Appendix F, *Traffic Study*).

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, which initiated a process to change transportation impact analyses completed in support of CEQA documentation. SB 743 eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, vehicle miles travelled (VMT). A VMT-based analysis is thus provided below, in Response 4.17(b). However, the City of Ventura General Plan has established a minimum acceptable performance standard of LOS E for freeway ramp intersections and LOS D at principal intersections with the exception that the County of Ventura Congestion Management Program (CMP) network may operate up to LOS E. Thus, the following analysis evaluates the project's potential to conflict with adopted LOS performance standards near the project site. The following analysis scenarios are evaluated in this section:

- Existing Conditions;
- Existing with Project Conditions;
- Future Conditions (General Plan Buildout); and
- Future Conditions (General Plan Buildout) with Project Conditions.

The Traffic Study is based on the traffic study guidelines, requirements, and adopted LOS performance standards for the City and Caltrans and is consistent with the CMP for Ventura County.

**STUDY AREA**

The Traffic Study identified the following study intersections for analysis; refer to Traffic Study Exhibit 3, *Existing Conditions Intersection Geometries*.

1. Telephone Road/U.S. 101 southbound;
2. Telephone Road/U.S. 101 northbound;
3. Telephone Road/Portola Road;
4. Telephone Road/Saratoga Avenue;
5. Victoria Avenue/SR-126 westbound;
6. Victoria Avenue/SR-126 eastbound;
7. Victoria Avenue/Thile Street;
8. Victoria Avenue/Telephone Road;
9. Victoria Avenue/Ralston Street;
10. Victoria Avenue/Moon Drive;

11. Victoria Avenue/U.S. 101 northbound;
12. Victoria Avenue/Valentine Road; and
13. Valentine Road/U.S. 101 southbound.

Due to the current Coronavirus Disease 2019 (Covid-19) environment, new traffic counts at the study intersections would not be considered to be representative of traffic flow occurring under normal conditions as AM and PM commute traffic is currently affected by both temporary workforce changes and increase in telecommuting,. To generate 2020 intersection volumes, the Traffic Study used historical count data Ventura Traffic Model and the City's average daily traffic (ADT) count program and developed a growth factor of 0.1 percent per year from the 2004 and 2007 ADT counts and 2004 and 2018 peak hour intersection counts, to represent existing 2020 conditions. The 0.1 percent growth rate was applied to the 2007 ADT counts from the City's ADT count program and to the 2004 peak hour intersection counts that were applied in the development of the City's traffic model.

## LOS CRITERIA

LOS is commonly used as a qualitative description of intersection operation and is based on the capacity of the intersection and the volume of traffic using the intersection.

### Intersection Capacity Utilization (ICU) Methodology

The City of Ventura measures intersection performance using the Intersection Capacity Utilization (ICU) methodology, consistent with the City's General Plan EIR. The ICU methodology compares the volume of traffic using the intersection to the capacity ratio of the intersection. The resulting volume-to-capacity (V/C) ratio represents that portion of the total hourly capacity required to provide sufficient capacity to accommodate all intersection traffic if all approaches operate at capacity. The City does not have thresholds to evaluate unsignalized intersections based on delay. However, per the Traffic Study and City direction, levels of service for unsignalized intersections are also determined using the ICU Methodology.

The ICU analysis methodology describes the operation of an intersection during the peak AM and PM commute periods and assigns a letter value, which range from LOS A (free-flow conditions) to LOS F (severely congested conditions), based on corresponding ranges of V/C at the intersection. Table 4.17-1, *Intersection LOS Criteria*, details each LOS and corresponding V/C ratio range.

**Table 4.17-1**
**ICU Intersection LOS and V/C Ranges**

| Level of Service | Volume to Capacity Ratio | Definition |
|---|---|---|
| A | 0.000 – 0.60 | Conditions of free unobstructed flow, no delays and all signal phases sufficient in duration to clear all approaching vehicles. |
| B | 0.61 – 0.70 | Conditions of stable flow, very little delay, a few phases are unable to handle all approaching vehicles. |
| C | 0.71 – 0.80 | Conditions of stable flow, delays are low to moderate, full use of peak direction signal phases is experienced. |
| D | 0.81 – 0.90 | Conditions approaching unstable flow, delays are moderate to heavy, significant signal time deficiencies are experienced for short durations during the peak traffic period. |
| E | 0.91 – 1.00 | Conditions of unstable flow, delays are significant, signal phase timing is generally insufficient, congestion exists for extended duration throughout the peak period. |
| F | > 1.00 | Conditions of forced flow, travel speeds are low and volumes are well above capacity. This condition is often caused when vehicles released by an upstream signal are unable to proceed because of back-ups from a downstream signal. |
| Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F. | | |

## TRAFFIC IMPACT CRITERIA AND THRESHOLDS

The following are the jurisdictional performance criteria and thresholds of significance applicable to the study area.

### City of Ventura Adopted Performance Standards

As noted, the City of Ventura General Plan has established the following minimum acceptable LOS E (peak hour ICU less than or equal to 1.00) for freeway ramp intersections and LOS D (peak hour ICU less than or equal to 0.90) at principal intersections with the exception that the County of Ventura CMP network may operate up to LOS E. Based on the County of Ventura guidelines, a significant impact occurs to a CMP facility if the proposed project increases traffic demand on a CMP facility by two percent of capacity (V/C > 0.02), causing or worsening LOS F (V/C > 1.00).

## EXISTING CONDITIONS

Table 4.17-2, *Existing Intersection LOS*, summarizes the results of the LOS analysis for the study area intersections under existing conditions. As shown in Table 4.17-2, the study intersections are currently operating at an acceptable LOS (LOS D or better) during AM and PM peak hours.

**Table 4.17-2**
**Existing Intersection LOS**

| Study Intersection | | Traffic Control | AM Peak Hour | | PM Peak Hour | |
|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS |
| 1 | Telephone Road/U.S. 101 southbound | Signal | 0.45 | A | 0.64 | B |
| 2 | Telephone Road/U.S. 101 northbound | Signal | 0.39 | A | 0.61 | B |
| 3 | Telephone Road/Portola Road | Signal | 0.38 | A | 0.47 | A |
| 4 | Telephone Road/Saratoga Avenue | Signal | 0.27 | A | 0.44 | A |
| 5 | Victoria Avenue/SR-126 westbound | TWSC | 0.66 | B | 0.62 | B |
| 6 | Victoria Avenue/SR-126 eastbound | Signal | 0.53 | A | 0.79 | C |
| 7 | Victoria Avenue/Thile Street | Signal | 0.50 | A | 0.52 | A |
| 8 | Victoria Avenue/Telephone Road | Signal | 0.57 | A | 0.63 | B |
| 9 | Victoria Avenue/Ralston Street | Signal | 0.59 | A | 0.75 | C |
| 10 | Victoria Avenue/Moon Drive | Signal | 0.50 | A | 0.53 | A |
| 11 | Victoria Avenue/U.S. 101 northbound | Signal | 0.66 | B | 0.62 | B |
| 12 | Victoria Avenue/Valentine Road | Signal | 0.61 | B | 0.62 | B |
| 13 | Valentine Road/U.S. 101 southbound | Signal | 0.40 | A | 0.55 | A |

Notes: V/C = volume-to-capacity ratio; LOS = level of service; TWSC = two-way stop control.
Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F.

### City of Ventura Roadway Regulations

Project Trip Generation

In order to accurately assess traffic conditions with the proposed project, trip generation estimates were developed for the project. Trip generation rates for the project are based on nationally recognized recommendations contained within the Institution of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition*. Trip generation rates utilized in the Traffic Study are detailed in Table 4.17-3, *Project Trip Generation Rates* and Table 4.17-4, *Project Trip Generation*. The site is currently occupied by a vacant light industrial building. The light industrial building is coded in Traffic Analysis Zone (TAZ) 87 in the Ventura Traffic Analysis Model (VTAM) as Warehouse/Manufacturing. Given that the site was operational when counts were collected, traffic generated by the existing use is credited under both project-specific and buildout conditions analyses.

**Table 4.17-3**
**Project Trip Generation Rates**

| Land Use | ITE Land Use Code | Units | Trip Rate | | | | |
|---|---|---|---|---|---|---|---|
| | | | ADT | AM | | PM | |
| | | | | In | Out | In | Out |
| Warehouse/Manufacturing | N/A | KSF | 4.96 | 0.37 | 0.08 | 0.12 | 0.39 |
| Medical Office | 720 | KSF | 34.80 | 2.17 | 0.61 | 0.97 | 2.19 |

Notes: ADT = average daily traffic; KSF = 1,000 square feet
Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F.

**Table 4.17-4**
**Project Trip Generation**

| Land Use | Size | ADT | AM | | | PM | | |
|---|---|---|---|---|---|---|---|---|
| | | | In | Out | Total | In | Out | Total |
| *Existing General Plan Land Use* | | | | | | | | |
| Warehouse/Manufacturing | 40.11 KSF | 199 | 15 | 3 | 18 | 5 | 16 | 21 |
| *Proposed Land Use* | | | | | | | | |
| Medical Office | 51 KSF | 1,775 | 111 | 31 | 142 | 49 | 112 | 161 |
| **Net New Trips** | | **1,576** | **96** | **28** | **124** | **44** | **96** | **140** |

Notes: ADT = average daily traffic; KSF = 1,000 square feet
Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F.

As shown in Table 4.17-4, the project is expected to generate 1,576 net new ADT, with 124 trips occurring in the AM peak hour and 140 trips occurring in the PM peak hour.

**City of Ventura Transit, Bicycle, and Pedestrian Facilities**

Gold Coast Transit District (GCTD) provides fixed-route bus and senior/ADA (Americans with Disabilities Act) paratransit service in the City of Ventura and adjacent cities. Bus Routes 6, 10, and 21 provide access from the Ventura Transit Center, Saticoy, and Oxnard to the project site with stops on Telephone Road and Victoria Avenue.

The Ventura Intercity Transit Authority (Vista) operates six commuter routes with service from Ventura to Santa Barbara and the University of California, Santa Barbara (UCSB) to the north, and service along SR-34, SR-126 and U.S. 101 to all cities in Ventura County and the San Fernando Valley. Route 50 (U.S. 101), Route 60 (SR-126) and Route 80 (Coastal Express) provide regional connections between the project site and destinations in Ventura and Santa Barbara counties.

The bicycle network connecting the project site with the adjacent residential and commercial areas consists of Class II bicycle lanes on Telephone Road, Portola Road, Ralston Street, and Walker Street. In addition, a Class I bike path extends from Telephone Road opposite Cypress point Lane and connects to a bike path extending parallel to SR-126.

***a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

***Less Than Significant Impact.***

**Existing with Project Conditions**

Project trips were distributed onto the study-area roadway network using the VTAM. The model removes trips generated by the existing warehouse/manufacturing use based on its employee trip distribution pattern and adds trips generated by the proposed project based on its employee/patient trip distribution pattern. Table 4.17-5, *Existing with Project LOS*, evaluates the project impact at the study intersections for Existing with Project conditions.

As shown in Table 4.17-5, the study intersections are forecast to operate at an acceptable LOS (LOS D or better) during AM and PM peak hours, and based on established performance standards for LOS, the project would not conflict with an adopted policy since it would not result in a substantial traffic impact at the study intersections under Existing with Project conditions.

**Table 4.17-5**
**Existing with Project LOS**

| Study Intersection | | Traffic Control | Existing | | | | Existing with Project | | | | V/C Increase | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | | | | |
| | | | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | AM Peak Hour | PM Peak Hour | Impact? |
| 1 | Telephone Road/ U.S. 101 southbound | Signal | 0.45 | A | 0.64 | B | 0.44 | A | 0.64 | B | 0.00 | 0.00 | NO |
| 2 | Telephone Road/ U.S. 101 northbound | Signal | 0.39 | A | 0.61 | B | 0.39 | A | 0.61 | B | 0.00 | 0.00 | NO |
| 3 | Telephone Road/ Portola Road | Signal | 0.38 | A | 0.47 | A | 0.39 | A | 0.47 | A | 0.01 | 0.01 | NO |
| 4 | Telephone Road/ Saratoga Avenue | Signal | 0.27 | A | 0.44 | A | 0.27 | A | 0.44 | A | 0.00 | 0.00 | NO |
| 5 | Victoria Avenue/ SR-126 westbound | TWSC | 0.66 | B | 0.62 | B | 0.67 | B | 0.62 | B | 0.01 | 0.00 | NO |
| 6 | Victoria Avenue/ SR-126 eastbound | Signal | 0.53 | A | 0.79 | C | 0.53 | A | 0.78 | C | 0.00 | 0.00 | NO |
| 7 | Victoria Avenue/ Thile Street | Signal | 0.50 | A | 0.52 | A | 0.50 | A | 0.50 | A | 0.00 | 0.00 | NO |
| 8 | Victoria Avenue/ Telephone Road | Signal | 0.57 | A | 0.63 | B | 0.58 | A | 0.64 | B | 0.01 | 0.01 | NO |
| 9 | Victoria Avenue/ Ralston Street | Signal | 0.59 | A | 0.75 | C | 0.59 | A | 0.76 | C | 0.00 | 0.01 | NO |
| 10 | Victoria Avenue/ Moon Drive | Signal | 0.50 | A | 0.53 | A | 0.50 | A | 0.53 | A | 0.00 | 0.00 | NO |
| 11 | Victoria Avenue/ U.S. 101 northbound | Signal | 0.66 | B | 0.62 | B | 0.66 | B | 0.62 | B | 0.00 | 0.00 | NO |
| 12 | Victoria Avenue/ Valentine Road | Signal | 0.61 | B | 0.62 | B | 0.61 | B | 0.61 | B | 0.00 | 0.00 | NO |
| 13 | Valentine Road/ U.S. 101 southbound | Signal | 0.40 | A | 0.55 | A | 0.40 | A | 0.56 | A | 0.00 | 0.01 | NO |

Notes: V/C = volume-to-capacity ratio; LOS = level of service; TWSC = two-way stop control.
Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F.

### Future Conditions

Traffic volumes for City of Ventura General Plan buildout conditions were derived from the VTAM. The traffic model incorporates a citywide set of year 2025 land use assumptions that were developed for the City's General Plan, with future land use density assumptions for each of the 331 TAZ's. The Future (General Plan buildout) and Future (General Plan buildout) with Project traffic conditions are show in Table 4.17-6, *Future with Project LOS*.

**Table 4.17-6**
**Future with Project LOS**

| Study Intersection | | Traffic Control | Existing | | | | Existing with Project | | | | V/C Increase | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | | | | |
| | | | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | AM Peak Hour | PM Peak Hour | Impact? |
| 1 | Telephone Road/ U.S. 101 southbound | Signal | 0.61 | B | 0.86 | D | 0.61 | B | 0.86 | D | 0.00 | 0.00 | NO |
| 2 | Telephone Road/ U.S. 101 northbound | Signal | 0.56 | A | 0.67 | B | 0.56 | A | 0.67 | B | 0.00 | 0.00 | NO |
| 3 | Telephone Road/ Portola Road | Signal | 0.36 | A | 0.56 | A | 0.35 | A | 0.55 | A | 0.00 | 0.00 | NO |
| 4 | Telephone Road/ Saratoga Avenue | Signal | 0.30 | A | 0.59 | A | 0.30 | A | 0.60 | A | 0.00 | 0.01 | NO |
| 5 | Victoria Avenue/ SR-126 westbound | TWSC | 0.86 | D | 0.74 | C | 0.88 | D | 0.74 | C | 0.02 | 0.00 | NO |
| 6 | Victoria Avenue/ SR-126 eastbound | Signal | 0.57 | A | 0.84 | D | 0.57 | A | 0.84 | D | 0.00 | 0.00 | NO |
| 7 | Victoria Avenue/ Thile Street | Signal | 0.52 | A | 0.60 | A | 0.53 | A | 0.62 | B | 0.01 | 0.02 | NO |
| 8 | Victoria Avenue/ Telephone Road | Signal | 0.63 | B | 0.72 | C | 0.64 | B | 0.71 | C | 0.01 | 0.00 | NO |
| 9 | Victoria Avenue/ Ralston Street | Signal | 0.69 | B | 0.77 | C | 0.68 | B | 0.78 | C | 0.00 | 0.01 | NO |
| 10 | Victoria Avenue/ Moon Drive | Signal | 0.56 | A | 0.62 | B | 0.56 | A | 0.62 | B | 0.00 | 0.00 | NO |
| 11 | Victoria Avenue/ U.S. 101 northbound | Signal | 0.81 | D | 0.66 | B | 0.81 | D | 0.66 | B | 0.00 | 0.00 | NO |
| 12 | Victoria Avenue/ Valentine Road | Signal | 0.69 | B | 0.79 | C | 0.69 | B | 0.78 | C | 0.00 | 0.00 | NO |
| 13 | Valentine Road/ U.S. 101 southbound | Signal | 0.48 | A | 0.58 | A | 0.48 | A | 0.59 | A | 0.00 | 0.01 | NO |

Notes: V/C = volume-to-capacity ratio; LOS = level of service; TWSC = two-way stop control.
Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F.

As shown in Table 4.17-6, the study intersections are forecast to operate at an acceptable LOS (LOS D or better) during AM and PM peak hours, and based on established performance standards for LOS, the project would not conflict with an adopted policy since it would not result in a substantial traffic impacts at the study intersections under Future (General Plan buildout) and Future (General Plan buildout) with Project conditions.

### CMP Consistency

The *Ventura County Congestion Management Program* (CMP), prepared by the Ventura County Transportation Commission, is intended to reduce traffic congestion and provide a mechanism for coordinating land use and

development decisions throughout Ventura County.[1] According to the Traffic Study, the minimum acceptable performance standard of a CMP facility is LOS E, and a significant impact occurs if the proposed project increases traffic demand on a CMP facility by two percent of capacity (V/C > 0.02), causing or worsening LOS F (V/C > 1.00).

Roadways: U.S. 101, SR-126, Victoria Avenue, and Telephone Road are included in the CMP network. According to the CMP, these facilities operate at LOS D or better during the AM and PM peak hour periods, except northbound U.S. 101, which operates in the LOS F range during the PM peak hour. The project would add 10 net new PM peak hour trips to northbound U.S. 101, which would increase the directional peak hour volume by less than 0.5 percent. This increase would not result in a CMP impact based on the impact criteria of an increase in traffic demand on a CMP facility by two percent of capacity.

Intersections: Within the project vicinity, the interchanges of U.S. 101 with Telephone Road and Victoria Avenue, the SR-126/Victoria Avenue interchange, and the intersection of Victoria Avenue with Telephone Road are included in the CMP network. The Traffic Study indicated that these intersections operate at LOS D or better. Based on the CMP criteria outlined above, the project would not generate an impact at any of the CMP intersections.

**City of Ventura Transit, Bicycle, and Pedestrian Facilities**

GCTD Bus Routes 6, 10, and 21 provide access from the Ventura Transit Center, Saticoy, and Oxnard to the project site with stops on Telephone Road and Victoria Avenue. Vista Routes 50 (U.S. 101), 60 (SR-126) and 80 (Coastal Express) provide regional connections between the project site and destinations in Ventura and Santa Barbara counties.

The project proposes demolish a vacant structure on-site and construct a new VA CBOC. The project does not include improvements to the local roadway system and therefore would not impact existing transit routes. Additionally, the proposed project is forecast to generate approximately 1,576 net new daily trips. Based on the relatively low project-generated trips, the proposed project is not expected to involve substantial impacts to transit service capacity. Therefore, a less than significant impact would occur in this regard.

Based on the *City of Ventura Bicycle Master Plan* (Bicycle Master Plan) (Figure 2, *Existing Bikeway Network*), within the project vicinity, a Class II bicycle facility occurs along Telephone Road and a Class I bike path extends from Telephone Road opposite Cypress point Lane and connects to a bike path extending parallel to SR-126.[2] Based on the Traffic Study, additional Class II bicycle lanes occur along Portola Road, Ralston Street, and Walker Street.

As stated, the project does not include improvements to the local roadway system and would not impact the surrounding Class II and Class I bicycle facilities near the project site. Consistent with the goals of the City's Bicycle Master Plan, bike racks are proposed north and south of the medical building. Each bike rack location would accommodate 16 bicycles (for a total of 32 bicycles). Sidewalk that borders the project site along Glacier Avenue, Ralston Street, Saratoga Avenue, and Walker Street would continue to occur and would continue to facility alternative modes of travel for pedestrians. Thus, implementation of the proposed project would not impair the surrounding transit, bicycle, or pedestrian facilities and a less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

***Less Than Significant Impact.*** As discussed, SB 743 eliminates LOS as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, VMT. As a result, the State is shifting from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving

[1] Ventura County Transportation Commission, *Ventura County Congestion Management Program*, adopted July 10, 2009.
[2] City of Ventura, *City of Ventura Bicycle Master Plan*, May 2011.

State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation.

The VMT Analysis follows the CEQA guidance for determining transportation impacts in accordance with SB 743. The City has not yet established VMT analysis procedures at this time; therefore, in lieu of the City adopting and setting its own VMT metric and thresholds, this analysis is consistent with the approach provided in the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), dated December 2018.

The OPR Technical Advisory recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required.

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends quantified thresholds for these land uses for purposes of analysis and mitigation. In general, the recommended "Threshold of Significance" is if a proposed project exceeds a level of 15 percent below existing regional VMT for that type of project, a significant transportation impact may be generated. However, for other uses (i.e. retail projects), a net increase in total VMT may indicate a significant transportation impact.

**Project Screening**

Prior to undertaking a detailed VMT analysis, the Technical Advisory advises a that a screening process be conducted "to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study." Projects may screen out VMT impacts using project size, maps depicting areas of low VMT, transit availability, and provision of affordable housing. Table 4.17-7, *Project Screening Criteria and Threshold*, below, provides a summary of the screening criteria and thresholds used for the project.

**Table 4.17-7**
**Project Screening Criteria and Threshold**

| Category | Criteria/Screening | Threshold |
|---|---|---|
| Trip generation screening | Small projects can be screened out from completing a full VMT analysis. | If the project generates less than 110 trips per day, the project is assumed to have a less than significant impact. |
| Map-based screening | Projects that are located in areas with low VMT can be screened out from completing a full VMT analysis. | If the project is in a low VMT area, the project is assumed to have a less than significant impact. |
| Proximity to transit | Projects within ½ mile of a major transit stop or a stop located along a high-quality transit corridor reduce VMT and therefore can be screened out from completing a full VMT analysis. | If the project is within ½ mile of a major or high-quality transit stop/corridor, the project is assumed to have a less than significant impact. |
| Affordable Residential development | Affordable housing in infill locations can be screened out from completing a full VMT analysis. | If the project is comprised 100 percent of affordable units and is located in an infill location, then the project is assumed to have a less than significant impact. |
| Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F. | | |

The project is estimated to generate approximately 1,576 net daily trips; therefore, the small project screening criteria would not apply. At this time, the City of Ventura does not have a map-based resource for identifying areas in the City with low VMT per capita; therefore, map-based screening cannot be utilized to determine if the project is in a low VMT

generating area. The project is currently not within a half mile proximity of a major transit stop; therefore, the project cannot be screened out based on its proximity to transit. The project is not an affordable residential development; therefore, the affordable residential development screening would not apply.

**VMT Analysis Performance Criteria**

Table 4.17-8, *SB 743 Recommended Significance Thresholds*, provides a summary of the Technical Advisory's recommended significance thresholds that may constitute a significant transportation impact. If a significant impact is identified utilizing the significance thresholds, mitigation to reduce VMT would be necessary.

**Table 4.17-8**
**SB 743 Recommended Significance Thresholds**

| Land Use Type | Metric | Threshold of Significance |
|---|---|---|
| Residential development | Household VMT per capita | 15% less than existing city household VMT per capita or regional household VMT per capita |
| Office development | VMT per employee | 15% less than existing regional VMT per employee |
| Retail development | Total VMT | If project causes a net increase in total VMT |
| Other project types | To be determined by lead agency through consideration of the purposes of the legislation (i.e., reductions to GHG, VMT per capita, and automobile trip generation) | |
| Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F. | | |

**VMT Analysis**

The Technical Advisory does not address specialty uses such as the proposed project (Clinic use). Therefore, the project has been evaluated as an employment generator consistent with the guidelines for office development since the project would generate employment-related trips, together with an assessment of the project's public use (e.g., patients).

Analysis of Employee VMT

The California State Transportation Demand Model (CSTDM) was utilized for this study to establish a regional threshold and VMT data for the project, consistent with OPR's guidelines. The project is located in CSTDM traffic analysis zone (TAZ) 3441. As shown in Table 4.17-9, *VMT Analysis Summary*, the Home-based Work (HBW) VMT per employee for TAZ 3441 is compared against the regional average HBW VMT per employee (Ventura County). the average regional HBW VMT per employee for Ventura County is 12.1 VMT per employee based on the CSTDM data. Consistent with the Technical Advisory, a 15 percent reduction is applied to existing conditions, resulting in a regional threshold of 10.3 VMT per employee.

**Table 4.17-9**
**VMT Analysis Summary**

| Description | HBW VMT per Employee |
|---|---|
| Project | |
| CSTDM TAZ 3441 | 11.5 |
| Regional Threshold | |
| CSTDM Ventura County Existing | 12.1 |
| CSTDM Ventura County Existing with 15% reduction | 10.3 |
| **Difference (Project minus Regional Threshold)** | **1.2** |
| **Is Project above or below Regional Threshold with 15% reduction?** | **Above** |
| **Transportation Impact?** | **YES** |
| Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F. | |

The existing HBW VMT per employee for employment generating uses in TAZ 3441 is 11.5 VMT per employee and the project is expected to exhibit similar characteristics in regard to employee commuting patterns. Since 11.5 VMT per employee is greater than the regional threshold with 15 percent reduction (10.3 VMT per employee), the project would be considered to have a VMT impact. However, based on the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures, the project provides the following design features which would reduce VMT:

1) The project is centrally located to residential, retail, office, and industrial uses and therefore increases the potential for pedestrians to walk and bike to these destinations and reduces VMT by 11.7 percent (CAPCOA Measure LUT-4),

2) The project is located within a half mile of an existing Class I path or Class II bike lane, which results in a 0.6 percent reduction in VMT (CAPCOA Measure LUT-8), and

3) The project will provide pedestrian access that links the on-site pedestrian network to the City's off-site pedestrian network (i.e., sidewalks), which results in a two percent reduction in VMT (CAPCOA Measure SDT-1).

The combination of VMT reducing project features (high accessibility to destinations, located near bike lanes, provide pedestrian network improvements) results in a net total VMT reduction of 13.7 percent. Note that the VMT reductions associated with the three design features are applied incrementally (11.7%, 0.6%, and 2.0%), resulting in a lower net reduction in comparison to the sum of the three numbers; refer to Table 4.17-10, *Project VMT with CAPCOA Mitigation Measures*.

**Table 4.17-10**
**Project VMT with CAPCOA Mitigation Measures**

| Description | HBW VMT per Employee |
|---|---|
| Project | 11.5 |
| CAPCOA Mitigation Reduction (LUT-4, LUT-8, and SDT-1) | 13.7 |
| Project with CAPCOA Mitigation Measures | 9.9 |
| **Regional Threshold** | **10.3** |
| **Is Project above or below Regional Threshold?** | **Below** |
| **Transportation Impact?** | **NO** |
| Source: Stantec, *Traffic and Circulation Study*, July 22, 2020; refer to Appendix F. | |

Based on Table 4.17-10, the 13.7 percent reduction in VMT is applied to the project's HBW VMT per employee and results in 9.9 HBW VMT, which is below the regional (Countywide) threshold of 10.3. Therefore, the project would result in a less than significant impact on VMT in this regard.

Analysis of Patient VMT

Currently, similar veteran's facilities are located approximately 13 miles to the south in the City of Oxnard and approximately 33 miles to the north in the City of Santa Barbara. As such, the project's location would reduce the amount of travel required for veterans living in the Ventura area and will result in a net reduction in VMT associated with this type of use.

***Mitigation Measures:*** No mitigation is required.

***c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

***Less Than Significant Impact With Mitigation Incorporated.*** The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment). The project proposes driveway improvements to provide site access and circulation. Site access would be provided via one driveway along Ralston Street and two driveways along Walker Street. The project would generate 96 inbound and 28 outbound trips (a total of 124 trips) during the AM peak hour and 44 inbound and 96 outbound trips (a total of 140 trips) during the PM peak hour. Based on the Traffic Study, the driveway configuration is anticipated to accommodate the forecast traffic generated by the project. As such, a less than significant impact would occur in this regard.

During the short-term construction process, the project could require partial/temporary lane closures and reductions in speed limits to ensure construction worker safety, that may result in temporary hazards for the traveling public. To address this temporary issue, Mitigation Measure TR-1 would be implemented. Mitigation Measure TR-1 would require implementation of a Transportation Management Plan (TMP), which would include various provisions to ensure continuous and adequate emergency access during the construction process. The TMP could include measures such as construction signage, pedestrian protection, limitations on timing for lane closures to avoid peak hours, temporary striping plans, identification of alternate bus stops during potential short-term bus stop closures, construction vehicle routing plans, and the need for a construction flag person to direct traffic during heavy equipment use. With implementation of Mitigation Measure TR-1, the impact would be less than significant.

***Mitigation Measures:***

TR-1 Prior to the initiation of construction, the City of Ventura City Engineer shall ensure that a Traffic Management Plan (TMP) has been prepared for the proposed project. The TMP shall include measures to minimize the potential safety impact during the short-term construction process, when partial lane closures may be required. It shall include measures such as construction signage, pedestrian protection, limitations on timing for lane closures to avoid peak hours, temporary striping plans, construction vehicle routing plans, and the need for a construction flag person to direct traffic during heavy equipment use. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

***d) Result in inadequate emergency access?***

***No Impact.*** As discussed in Response 4.9(f), the City is currently using the Standardized Emergency Management System (SEMS) for emergency response, where depending on the type of incident, several different agencies and disciplines may be called upon to assist with emergency response. Agencies and disciplines that can be expected to be part of an emergency response team include medical, health, fire and rescue, police, public works, and the coroner.

The proposed driveways and circular travel way designed for patient drop-off and fire access in front of the medical building would meet the fire truck turning radii and fire access requirements and would not result in inadequate emergency access. Additionally, the project would be subject to City of Ventura Fire Department review of the site plans, site construction, and structures prior to occupancy. This review would include verifying that the proposed site ingress and egress is adequate for emergency response. The proposed project would not result in inadequate emergency access, and all local roadways in the site vicinity would remain open during and after construction. Thus, no impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

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# 4.18 TRIBAL CULTURAL RESOURCES

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | | ✓ | | |

The analysis of cultural resources is partially based upon the *Phase 1: Historic Assessment Report* (Historic Report), dated March 6, 2020, and prepared by Historic Resources Group (refer to Appendix D, *Historic Assessment Report*).

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called tribal cultural resources. Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

In compliance with AB 52, and as the CEQA implementing agency, the City of Ventura distributed letters to tribes, based on a tribal consultation list provided by the Native American Heritage Commission (NAHC) dated April 21, 2020. The letters provided a description of the project, and notified each tribe of the opportunity to consult with the City regarding the proposed project. On April 22, 2020, in response to the COVID-19 environment, the governor issued Executive Order N-54-20 delaying tribal consultation timelines for 60 days.[1] Thus, when combining the traditional tribal consultation notification period of 30 days with the 60 day delay under Executive Order N-54-20, the tribes had 90 days

[1] Executive Department State of California, Executive Order N-54-20, https://www.gov.ca.gov/wp-content/uploads/2020/04/N-54-20-COVID-19-4.22.20.pdf, accessed May 19, 2020.

to respond to the City's request for consultation. During this time, no tribes responded to the request for opportunity to consult for the proposed project under AB 52.

***a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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***

***Less Than Significant Impact.*** Refer to Response 4.5(a). Based on the Historic Report prepared for the project, there are no resources 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) that would be affected by the project.

The existing vacant property located on-site was originally developed as an office and printing plant in 1977 by the Ventura County Star-Free Press. However, the project site is located within an urbanized area, has been impacted by development, and is not 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). Thus, impacts to historic resources would be less than significant in this regard.

***Mitigation Measures:*** No mitigation is required.

***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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

***Less Than Significant Impact With Mitigation Incorporated.*** As noted above, the City solicited consultation with potentially affected Native American tribes (as applicable) regarding the proposed project in accordance with AB 52. To date, no tribes have responded to the City's solicitation for consultation. Based on the General Plan FEIR, 25 recorded archaeological sites and 96 historic landmarks or points of interest, of which at least 43 may also contain subsurface cultural resources, occur within the City. However, none of these identified sites fall within the project site area. Thus, the proposed project would not have a significant impact to a known tribal cultural resource.

As discussed in Response 4.5(b), although the potential for encountering known tribal cultural resources is low, in the event that tribal cultural resources are encountered during earth disturbing activities, all work would be required to be halted in the vicinity of the find (a minimum of a 50-foot radius) until the resources can be properly evaluated by a qualified archaeologist (recommended Mitigation Measure CUL-1). If warranted, the archaeologist would be required to prepare and complete a standard mitigation program for the salvage and curation of identified resources. In the event Native American resources are discovered, the City shall consult with a Native American monitor and affected tribe(s). Upon implementation of this mitigation measure, potential impacts to unknown tribal cultural resources that may underlie the project site would be reduced to less than significant levels.

***Mitigation Measures:*** Refer to Mitigation Measure CUL-1 within Section 4.5, *Cultural Resources*.

# 4.19 UTILITIES AND SERVICE SYSTEMS

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | | ✓ | |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | ✓ | |
| c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | ✓ | |
| d. 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? | | | ✓ | |
| e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | | ✓ |

***a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

***Less Than Significant Impact*.**

**Water**

The project site is served by the City's water and wastewater department (Ventura Water), which provides potable water service to approximately 113,500 persons throughout the City.[1] As stated in the City's 2015 Urban Water Management Plan, Ventura Water operates and maintains three water treatment plants, 380 miles of distribution pipelines, 21 pump stations, and 32 tanks and reservoirs.[2]

Five distinct sources provide surface and groundwater to the City supply system:

- Casitas Municipal Water District
- Ventura River surface water intake, subsurface water and wells (Foster Park)
- Mound Groundwater Basin
- Oxnard Plain Groundwater Basin (Fox Canyon Aquifer)
- Santa Paula Groundwater Basin

[1] Ventura Water, *2019 Comprehensive Water Resources Report*, pages 1-2, May 29, 2019.
[2] Kennedy/Jenks Consultants, *Final 2015 Urban Water Management Plan for City of Ventura*, pages 1-9, June 2016.

The *Water and Sewer Infrastructure Review* (Water and Sewer Review) for the project was conducted by MKN & Associates, Inc., dated June 1, 2020.[3] According to the Water and Sewer Review, the proposed project is located within the City's 330 water distribution system pressure zone, which is gravity fed by the Bailey Reservoir. Based on the Water and Sewer Review, the proposed project would result in a net increase in annual water demand of 2.57 acre-feet per year (AFY), or approximately 2,291 gallons per day (gpd). According to the Water and Sewer Review's water storage analysis, the 330-pressure zone would have a water storage surplus of 1.64 million gallons with consideration of this project, proposed projects in the area, and other developments anticipated in the area based on the General Plan.

The proposed project would install a domestic water pipeline and an irrigation service line, each with associated meter and back flow preventor (BFP), to connect to the Ventura Water's existing water main in Saratoga Avenue. Further, new fire service laterals would be installed and connected to the existing water main in Walker Street. As the project is consistent with the land use designation and zoning for the site, payment of standard water connection fees, ongoing user fees, and a Net Zero Fee pursuant to City Ordinance No. 2016-004 would ensure that the project's impacts to existing water facilities are adequately offset. Additionally, all private water lines are required to be designed and constructed in accordance with the latest edition of the Standard Specifications for Public Works Construction, and the American Water Works Association Standards. It is not anticipated that project implementation would require construction of new or expanded water facilities that could result in substantial environmental impacts. A less than significant impact would occur in this regard.

**Wastewater**

As discussed, the project site is served by Ventura Water. According to the Water and Sewer Review, the proposed project is located within Sewershed I and connects to the wastewater collection system on Walker Street between Glacier Avenue and Saratoga Avenue.[4] As stated in the City's 2015 Urban Water Management Plan (UWMP), the Ventura Water Reclamation Facility (VWRF or Plant) is permitted at 14 million gallons per day (MGD) and discharges up to 9 MGD. The VWRF currently discharges less than 9 MGD during drought conditions. The City's existing National Pollutant Discharge Elimination System (NPDES) permit issued by the Regional Water Quality Control Board (RWQCB) for the VWRF indicates that once the average daily dry-weather flow equals or exceeds 75 percent of the Plant's design capacity, then a report must be submitted outlining the steps needed to provide for additional capacity for waste treatment. Flows are monitored due to the permit requirement to consider expansion when at 75 percent capacity.

The proposed project would construct a domestic wastewater pipeline that connects to an existing sewer main in Glacier Avenue. Based on the Water and Sewer Review, the proposed project would generate 2,801 gpd of wastewater, or 3.14 AFY. According to the Water and Sewer Review's hydraulic model results, no pipe segments downstream of the project's flow path are deficient with consideration of this proposed project, other projects in the area, and other developments anticipated in the area based on the General Plan. As such, the Water and Sewer Review concluded that there would be no offsite wastewater distribution system improvement required. Given the remaining capacity available at the VWRF, sufficient capacity exists to serve the project and new wastewater treatment facilities or expansion of existing facilities would not be necessary. Notwithstanding, the project would be required to pay standard wastewater connection fees and ongoing user fees to ensure that sufficient wastewater treatment capacity is available. Following compliance with relevant laws, ordinances, and regulations, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities that would result in a substantial environmental impact. Impacts would be less than significant in this regard.

[3] MKN & Associates Inc., *Water & Sewer Infrastructure Review – Proj-14017; 5250 Ralston Street; APN: 137-0-013-055*, June 1, 2020.
[4] Ibid.

**Stormwater**

Stormwater and non-stormwater runoff generated within City limits is transported through the municipal separate storm sewer system (MS4), and then discharged, untreated, into local waterbodies such as the Santa Clara River, Ventura River and Pacific Ocean.[5] The proposed project would install three on-site infiltration basins and a linear infiltration trench sized to meet the project's design capture volume in accordance to the City's MS4 permit requirement; refer to Section 4.10, *Hydrology and Water Quality*.

The project's potential short-term and long-term impacts regarding the abovementioned stormwater drainage improvements are analyzed in Section 4.10. Construction of the new storm drain improvements would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. Compliance with relevant laws, ordinances, and regulations would ensure the project's impacts associated with the proposed storm drain improvements are less than significant.

**Dry Utilities**

Natural gas and electricity are provided to the project site by Southern California Gas Company (SCGC) and Southern California Edison (SCE), respectively. The project would involve constructing new private on-site dry utility lines associated with such services. Payment of standard utility connection fees and ongoing user fees would be required to ensure these utility services would be able to accommodate the proposed development. Construction of the project's dry utilities would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations throughout this Initial Study. As such, project impacts would be less than significant in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

***Less Than Significant Impact.*** The City relies on local groundwater, water from Lake Casitas, and subsurface water from the Ventura River, as well as recycled water from the VWRF to meet its water needs. Specifically, five local water sources provide water to the City water system, including the Casita Municipal Water District, Ventura River Foster Park Area, Mound Groundwater Basin, Oxnard Plain Groundwater Basin, and Santa Paula Groundwater Basin.[6] Additionally, the City has a 10,000 acre-foot per year entitlement from the California State Water Project.

As discussed, based on the Water and Sewer Review, the proposed project would increase water demand by 2.57 AFY, or approximately 2,291 gpd. As such, the project's estimated water demand would represent less than 0.01 percent of the City's total estimated water demand of 15,789 AFY for 2020 and 17,074 AFY for 2030.[7] Further, the project would be required to comply with water efficiency standards in the 2019 California Building Energy Efficiency Standards and 2019 California Green Building Standards Code. Additionally, to ensure that new development does not adversely affect the water supply or water supply reliability of the City's existing customers and/or approved new development, the City adopted the Water Rights Dedication and Water Resource Net Zero Policy (Ordinance No. 2016-004) in 2016. Ordinance No. 2016-004 requires development projects to offset new or increased water demand through one or more compliance options, including dedication of water rights, extraordinary conservation measures, and/or payment of a fee (Net Zero Fee).[8] As the project is consistent with the land use designation and zoning for the site,

[5] City of Ventura, *MS4 Permit*, https://www.cityofventura.ca.gov/1301/MS4-Permit, accessed April 19, 2020.
[6] Ventura Water, *2019 Comprehensive Water Resources Report*, page 4-1, May 29, 2019.
[7] Ventura Water, *2020 Comprehensive Water Resources Report*, *Table ES-1 Summary of Water Supply and Demand*, April 16, 2020.
[8] Ventura Water, *Water Rights Dedication and Water Resource Net Zero Policy (Memo)*, https://www.cityofventura.ca.gov/DocumentCenter/View/5639/Net-Zero-Memo?bidId=, July 1, 2019.

payment of standard water connection fees, ongoing user fees, and a Net Zero Fee would ensure that the project's impacts on water demand are adequately offset. A less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

***Less Than Significant Impact.*** As stated in Response 4.19(a), the proposed project would result in the generation of additional wastewater above existing conditions. However, there is remaining capacity for wastewater treatment at the VWRF to serve the project's projected demand in addition to existing commitments. As such, a less than significant impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***d) 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?***

***Less Than Significant Impact.*** E.J. Harrison and Son's, Inc. provides solid waste collection for the City, including the project site.[9] Curbside trash and recyclables are first hauled to Gold Coast Recycling and Transfer Station in the City of Ventura. Trash would then be hauled to the Toland Road Landfill located at 3500 North Toland Road in the City of Santa Paula, while recyclable materials are hauled to the Gold Coast Inc.'s Materials Recovery Facility located at 5275 Colt Street in the City of Ventura. All collected yard waste is hauled directly to the Limoneira/Agromin Agricultural Material Composting Operation, located at 2390 Telegraph Road in the City of Santa Paula. In 2018, a total of 287,889 tons of solid waste was collected within the City, with over 90 percent admitted to Toland Road Landfill.[10] It is noted that the City has a landfill diversion rate of 74 percent.[11]

**Short-Term Impacts**

The proposed project would require demolishing the existing on-site structure and surface parking to construct the proposed VA CBOC. Demolition is expected to generate approximately 28,798 tons of building material. Given the remaining capacity of any City's permitted landfills identified in Table 4.19-1, *Landfills Serving the City*, the project's disposal of construction materials would not substantially impact the regional landfill capacity. Further, all construction activities would adhere to Federal, State, and local requirements related to solid waste disposal. Specifically, as mandated by Municipal Code Section 6.500.110, *Collection of Solid Waste*, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste production be recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2019 Green Building Code, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

[9] City of Ventura, *City of Ventura Waste and Recycling*, https://www.cityofventura.ca.gov/264/Waste-and-Recycling, accessed April 19, 2020.
[10] California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2018 for San Buenaventura*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed April 19, 2020.
[11] City of Ventura, *City of Ventura Waste and Recycling*, https://www.cityofventura.ca.gov/264/Waste-and-Recycling, accessed April 19, 2020.

**Long-Term Impacts**

Based on an estimated industrial solid waste generation rate of 8.93 pounds per employee (115 employees) per day,[12] project operations are expected to generate approximately 1,027 pounds of solid waste per day, or approximately 0.51 tons per day. This represents less than 0.01 percent of the maximum daily permitted throughput capacity of any City's permitted landfills identified in Table 4.19-1. Additionally, the project would adhere to Municipal Code Section 6.500.110, which provides regulations for disposal and reduction of solid waste within the City. As such, the project is not anticipated to generate solid waste in excess of capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts in this regard would be less than significant.

**Table 4.19-1**
**Landfills Serving the City**

| Landfill/Location[1] | Amount Disposed by City in 2018 (tons)[2] | Maximum Daily Throughput (tons per day)[3] | Remaining Capacity (cubic yards)[3] | Anticipated Closure Date[3] |
|---|---|---|---|---|
| Toland Road Landfill<br>3500 North Toland Road, Santa Paula, CA 93060 | 264,526.00 | 1,500 | 16,068,864 | 05/31/2027 |
| Simi Valley Landfill & Recycling Center<br>2801 Madera Road, Simi Valley, CA 93065 | 22,915.97 | 9,250 | 88,300,000 | 01/31/2052 |
| McKittrick Waste Treatment Site<br>56533 Highway 58, McKittrick, CA 93251 | 217.41 | 3,500 | 769,790 | 12/31/2059 |
| Clean Harbors Buttonwillow LLC<br>2500 West Lokern Road, Buttonwillow, CA 93206 | 180.96 | 10,500 | n/a | 01/01/2040 |
| Azusa Land Reclamation Co. Landfill<br>1211 West Gladstone Street, Azusa, CA 91702 | 40.88 | 8,000 | 51,512,201 | 01/01/2045 |
| Chiquita Canyon Sanitary Landfill<br>29201 Henry Mayo Drive, Castaic, CA 91384 | 5.31 | 12,000 | 60,408,000 | 01/01/2047 |
| Antelope Valley Public Landfill<br>1200 West City Ranch Road, Palmdale, CA 93551 | 2.55 | 5,548 | 17,911,225 | 04/01/2044 |
| Lancaster Landfill and Recycling Center<br>600 East AvenueF, Lancaster, CA 93535 | 0.08 | 5,100 | 14,514,648 | 03/01/2044 |

Sources:
1. California Department of Resources Recycling and Recovery, *SWIS Facility/Site Search*, https://www2.calrecycle.ca.gov/SWFacilities/Directory/, accessed April 19, 2020.
2. California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2018 for San Buenaventura*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed April 19, 2020.
3. California Department of Resources Recycling and Recovery, *Transported Solid Waste*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Statewide/TransportedSolidWaste, accessed April 20, 2020.

***Mitigation Measures:*** No mitigation is required.

[12] California Department of Resources Recycling and Recovery, *Estimated Solid Waste Generation Rates*, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed April 19, 2020.

***e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

***No Impact.*** The proposed project would comply with all Federal, State, and local statutes and regulations related to solid waste, including Municipal Code Section 6.500.110 and AB 939 discussed in Response 4.20(d), above. No impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

# 4.20 WILDFIRE

| *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | ✓ |
| b. 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? | | | | ✓ |
| c. 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? | | | | ✓ |
| d. 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? | | | | ✓ |

***a) Substantially impair an adopted emergency response plan or emergency evacuation plan?***

***No Impact.*** Refer to Response 4.9(f). According to the General Plan, the City currently uses the Standardized Emergency Management System (SEMS) for emergency response. Further, the City adopted the *2015 Ventura County Multi-Hazard Mitigation Plan* (2015 MHMP). The purpose of the 2015 MHMP is to identify policies and actions that can be implemented in Ventura County to reduce risk and future losses related to hazards such as earthquakes, floods, geologic hazards, and wildfires.

According to the General Plan EIR Figure 4.11-2, *Wildfire Risk Areas*, and the California Department of Forestry and Fire's *Fire Hazard Severity Zones in Local Responsibility Area Map*, the project site is not located in or near State Responsibility areas (SRA), nor is it classified as a very high fire hazard severity zones. As indicated in Section 4.17, *Transportation*, the project does not propose changes to the City's circulation system and would not introduce incompatible uses to area roadways. No lane closure would be required along adjacent roadways and proper emergency access would be maintained on-site. As such, it is not anticipated that the proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

***b) 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?***

***No Impact.*** As discussed in Response 4.20(a), above, the project site is not located in or near SRA, nor is it classified as a very high fire hazard severity zone.[1] No impact would occur in this regard.

[1] California Department of Forestry and Fire Protection, *Ventura Very High Fire Hazard Severity Zones in LRA Map*, published October 6, 2010, accessed April 13, 2020.

***Minimization Measures:*** No mitigation is required.

***c) 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 Impact.*** Refer to Responses 4.20(a) and 4.20(b).

***Mitigation Measures:*** No mitigation is required.

***d) 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 Impact.*** Refer to Responses 4.10(c)(1), 4.10(c)(2), and 4.20(a) through 4.20(c). Based on Responses 4.10(c)(1) and (2), project implementation would not result in an increased risk to people or structures as it relates to flooding or soil instability. No impacts would occur in this regard.

***Mitigation Measures:*** No mitigation is required.

# 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

| *Would the project:* | Potentially Significant Impact | Less Than Significant Impact With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | | ✓ | | |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | | ✓ | | |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | ✓ | | |

***a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

***Less Than Significant Impact With Mitigation Incorporated.*** As shown within Section 4.4, *Biological Resources*, construction of the VA CBOC would occur within an urbanized and fully developed area. The project site has been previously graded and developed with an office and printing plant facility. The project would not result in direct impacts to any sensitive species or wildlife habitat and impacts to sensitive biological resources would be less than significant. Since the proposed project may result in the removal of on-site ornamental vegetation and trees, the proposed project could result in potential impacts to nesting birds protected by the Migratory Bird Treaty Act (MBTA). Mitigation Measure BIO-1 has been included in order to minimize potential impacts to nesting birds in the event any mature trees are affected during the avian nesting season.

In addition, as described within Sections 4.5, *Cultural Resources* and 4.7, *Geology and Soils*, the project site has been completely disturbed by development and has been subject to ground disturbance in the past. As such, any historical, archaeological, and paleontological resources which may have existed in the project area have likely been disturbed. However, Mitigation Measures CUL-1 and GEO-1 would be required in the event unexpected resources are uncovered during the grading and excavation process. With implementation of recommended mitigation, the project is not anticipated to eliminate important examples of the major periods of California history or prehistory. Thus, impacts in this regard would be less than significant.

Further, as described within Section 4.5, *Cultural Resources* and Section 4.18, *Tribal Cultural Resources*, the project would not have the potential to eliminate important examples of the major periods of California history or prehistory. No historic-era resources eligible for the National Register of Historic Places or California Register of Historical Resources would be affected by the project, and Mitigation Measure CUL-1 would minimize potential effects related to buried archaeological resources. Thus, impacts in this regard would be less than significant.

***b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

***Less Than Significant Impact With Mitigation Incorporated.*** The proposed project would include demolition of the existing office and printing plant and construction of the VA CBOC. The project would not result in substantial population growth within the area, either directly or indirectly. Although the project may incrementally affect other resources that were determined to be less than significant, the project's contribution to these effects is not considered "cumulatively considerable," in consideration of the relatively nominal impacts of the project and mitigation measures provided. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

***c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

***Less Than Significant Impact With Mitigation Incorporated.*** This Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, geology and soils, greenhouse gases, hydrology/water quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in this Initial Study, the proposed project would result in less than significant environmental impacts with implementation of the recommended mitigation measures. Therefore, the proposed project would not result in environmental impacts that would cause substantial adverse effects on human beings.

## 4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Environmental Checklist. These documents are available for review at the City located at 501 Poli Street, Ventura, California 93002-009.

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5. California Air Resources Board, *2017 Scoping Plan*, November 2017.

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# 5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City prepare a mitigated negative declaration for the Veterans Affairs Community-Based Outpatient Clinic project. We find that the proposed project could have a significant effect related to a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend that the second category be selected for the City's determination (see Section 6.0, *Lead Agency Determination*).

September 2020
Date

Jessica Ditto, Environmental Project Manager
Michael Baker International

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# 6.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

The City finds that the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. —

The City finds that although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Section 4.0 have been added. A MITIGATED NEGATIVE DECLARATION will be prepared. ✓

The City finds that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. —

The City finds that the proposal MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. —

| | |
|---|---|
| Signature | City of San Buenaventura<br>Agency |
| Elizabeth Richardson<br>Printed Name | September 2020<br>Date |

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