

**FINAL  
NEGATIVE DECLARATION  
VENTURA COUNTY MEDICAL CENTER  
PARKING LOT IMPROVEMENTS PROJECT**

**SCH NO. 2023010327**



Lead Agency:

**Ventura County Public Works Agency**  
800 South Victoria Avenue  
Ventura, California, 93009  
Contact: Ms. Devi Nallamala 805/658-4354

Prepared by:

**Padre Associates, Inc.**  
1861 Knoll Drive  
Ventura, CA 93003

**March 2023**

Project no. 2102-4961

## TABLE OF CONTENTS

Section	Page
NEGATIVE DECLARATION.....	ND-1
1.0 INTRODUCTION.....	1
1.1 Purpose and Legal Authority.....	1
1.2 Project Proponent and Lead Agency.....	1
1.3 Project Location .....	1
1.4 Project Purpose .....	1
1.5 Objectives.....	1
1.6 Baseline.....	1
1.7 Preparers of the Initial Study.....	1
2.0 PROJECT DESCRIPTION .....	2
2.1 Land Use History .....	2
2.2 Adjacent Land Uses.....	2
2.3 Project Characteristics .....	2
2.4 Project Components .....	2
2.5 Operation.....	3
2.6 Construction.....	3
2.7 Responsible Agencies and Permits.....	3
3.0 LAND USE SETTING .....	4
4.0 ENVIRONMENTAL IMPACT ANALYSIS.....	8
Issue 1: Air Quality .....	8
Issue 2: Water Resources .....	12
Issue 3: Mineral Resources .....	16
Issue 4: Biological Resources.....	17
Issue 5: Agricultural Resources .....	19
Issue 6: Scenic Resources .....	20
Issue 7: Paleontological Resources.....	20
Issue 8: Cultural Resources.....	21
Issue 9: Coastal Beaches and Sand Dunes.....	28
Issue 10: Fault Rupture Hazard.....	28

## TABLE OF CONTENTS (CONTINUED)

Section	Page
Issue 11: Ground-shaking Hazard .....	29
Issue 12: Liquefaction Hazards .....	29
Issue 13: Seiche and Tsunami Hazards .....	29
Issue 14: Landslide/Mudflow Hazards .....	30
Issue 15: Expansive Soils Hazard .....	30
Issue 16: Subsidence Hazard .....	30
Issue 17: Hydraulic Hazards .....	31
Issue 18: Fire Hazards .....	31
Issue 19: Aviation Hazards .....	32
Issue 20: Hazardous Materials/Waste .....	32
Issue 21: Noise and Vibration .....	33
Issue 22: Daytime Glare .....	35
Issue 23: Public Health .....	36
Issue 24: Greenhouse Gases .....	36
Issue 25: Community Character .....	39
Issue 26: Housing .....	39
Issue 27: Transportation/Circulation .....	40
Issue 28: Water Supply .....	42
Issue 29: Waste Treatment and Disposal Facilities .....	43
Issue 30: Utilities .....	44
Issue 31: Flood Control Facilities/Watercourses .....	45
Issue 32: Law Enforcement/Emergency Services .....	45
Issue 33: Fire Protection Services .....	46
Issue 34: Education .....	46
Issue 35: Recreation Facilities .....	46

## TABLE OF CONTENTS (CONTINUED)

Section	Page
5.0 CUMULATIVE IMPACTS.....	48
5.1 Cumulative Projects Description .....	48
5.2 Cumulative Impact Analysis .....	49
6.0 GROWTH INDUCEMENT .....	50
7.0 REFERENCES.....	51

## TABLES

	Page
Table 1 Air Quality Summary .....	9
Table 2 Special-Status Species Reported within Two Miles of the Project Site .....	19
Table 3 Ambient Noise Measurement Data Summary .....	35
Table 4 Greenhouse Gas Emissions Summary .....	39

## FIGURES

	Page
Figure 1 Project Location Map .....	5
Figure 2 Site Photographs .....	6
Figure 3 Parking Lot Plan .....	7

## APPENDICES

A Initial Study Checklist	
B Public Comments and Responses	



## **FINAL NEGATIVE DECLARATION FOR THE VENTURA COUNTY MEDICAL CENTER PARKING LOT IMPROVEMENTS PROJECT**

### **LAND USE HISTORY**

The project site supported the former Colston Youth Center, which was used from about 1967 to 2006 as a juvenile detention/treatment facility. The Center was demolished in November 2022 and the site is currently vacant.

### **PROJECT DESCRIPTION**

**Project Characteristics.** The project consists of construction of a 1.7-acre parking lot. The parking lot would be located at the former Colston Youth Center site and extend an additional 150 feet to the north.

**Project Components.** The approximately 1.7-acre parking lot would be composed of asphalt concrete and include the following features:

- 139 standard parking spaces (9 by 18-foot).
- Two bi-directional access driveways from Hillmont Avenue.
- Ten LED light fixtures mounted on 28-foot-tall light standards, focused downwards to provide security lighting.
- Trees will be provided in parking islands throughout the proposed parking lot.
- Irrigated landscaping along Hillmont Avenue (approximately 10 feet wide, or about 3,600 square feet).
- A 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bio-swale.
- Screening landscaping immediately east of the storm water treatment area (approximately six feet wide, or about 570 square feet).
- Fencing along the perimeter of the storm water treatment area.

A preliminary parking lot plan is provided as Figure 3; however, the layout details may be subject to revision as the design progresses.

**Operation.** The proposed parking lot would serve the Ventura County Medical Center (VCMC), including staff, patients and visitors. Parking lot maintenance including landscape irrigation and maintenance, litter control, pavement repairs and storm water treatment maintenance would be the responsibility of VCMC.

**Construction.** Parking lot construction is anticipated to require about 75 workdays and would be initiated in July 2023. Construction would be primarily limited to normal working hours between the hours of 8 a.m. and 5 p.m., Monday through Friday, with occasional work on Saturday.

## **PROJECT LOCATION**

The project site is comprised of a 1.7-acre portion of Assessor's Parcel No. 074-0-170-080 within the VCMC campus. More specifically, the site is located at 375 Hillmont Avenue, Ventura (see Figure 1). The project site is located within the City of Ventura. City zoning for the project site is R-1-7 (residential).

## **PROJECT PROPONENT AND LEAD AGENCY**

Ventura County Public Works Agency  
800 South Victoria Avenue  
Ventura, California 93009

Contact: Devi Nallamala (805) 658-4354

## **PROPOSED FINDINGS**

The Public Works Agency has prepared this Negative Declaration (ND) pursuant to Sections 15070-15075 of the State Guidelines for the Implementation of the California Environmental Quality Act and the County of Ventura Administrative Supplement to the State CEQA Guidelines. This Negative Declaration documents the Public Works Agency's finding that there are no significant adverse unavoidable impacts associated with the proposed project, and the project does not require the preparation of an Environmental Impact Report (EIR). The attached Initial Study identifies and discusses potential impacts for identified subject areas.

## **PUBLIC COMMENTS**

In compliance with Section 15073 of the State Guidelines for the Implementation of the California Environmental Quality Act, the Public Works Agency accepted written comments on the adequacy of the information contained in the Draft ND during the public comment period (January 19 through February 21, 2023). This Final ND includes public comments, responses to public comments and text changes (strike-out and underline mode) to the Draft ND needed as part of comment responses.

Due to the non-complex nature of this project, a separate environmental hearing will not be held. However, public testimony will be accepted at the ND approval hearing before the Board of Supervisors. For information regarding scheduling of this hearing, please contact Ms. Devi Nallamala at (805) 658-4354.

## **1.0 INTRODUCTION**

### **1.1 PURPOSE AND LEGAL AUTHORITY**

An Initial Study has been prepared for the Ventura County Medical Center Parking Lot Improvements (proposed project), which has been proposed by the Ventura County Public Works Agency, the project proponent. Section 2.0 of this document provides a description of the proposed project. The Public Works Agency is also the “lead agency” for the proposed project. As defined by Section 15367 of the CEQA Guidelines, the lead agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant impact on the environment.” Based on the findings of the Impact Analysis (Section 4.0 of this Initial Study), it has been determined that the project would not have a significant impact on the environment. As such, a Negative Declaration has been prepared for the project in accordance with CEQA.

### **1.2 PROJECT PROPONENT AND LEAD AGENCY**

Ventura County Public Works Agency  
800 South Victoria Avenue  
Ventura, California 93009

Contact: Devi Nallamala (805/658-4354)

### **1.3 PROJECT LOCATION**

The project site is comprised of a 1.7-acre portion of Assessor’s Parcel No. 074-0-170-080 within the Ventura County Medical Center (VCMC) campus. More specifically, the site is located at 375 Hillmont Avenue, Ventura (see Figure 1). The project site is located within the City of Ventura. City zoning for the project site is R-1-7 (residential).

### **1.4 PROJECT PURPOSE**

The purpose of the project is to provide a new parking lot to serve VCMC and ancillary buildings.

### **1.5 OBJECTIVES**

The primary objective of the proposed project is to provide needed parking spaces to serve VCMC and ancillary buildings.

### **1.6 BASELINE**

The baseline for environmental analysis is the physical conditions at the project site following completion of demolition of the former Colston Youth Center, including removal of all debris and related equipment and materials.

### **1.7 PREPARERS OF THE INITIAL STUDY**

This document was prepared for the Ventura County Public Works Agency by Padre Associates, Inc. including Matt Ingamells (Project Manager/Senior Biologist), Rachael Letter (Senior Archeologist) and Lucas Bannan (Graphics Specialist).

## **2.0 PROJECT DESCRIPTION**

### **2.1 LAND USE HISTORY**

The project site supported the former Colston Youth Center, which was used from about 1967 to 2006 as a juvenile detention/treatment facility. The building was demolished in November 2022 and the site is currently vacant. Photographs of the project site and vicinity are provided as Figure 2.

### **2.2 ADJACENT LAND USES**

VCMC is located immediately to the east of the project site, opposite Hillmont Avenue. To the north of the project site is an undeveloped area, which has been occasionally used for construction staging and contractor parking during VCMC construction projects. Part of this area is proposed to be included in the new parking lot. A parking lot and building currently used for office space by the Ventura County Health Care Agency are located south of the project site. West of the project site is a single-family residential area along Estrella Street. A fence along the parcel's western boundary separates the parking lot site from the adjacent single-family residential area.

### **2.3 PROJECT CHARACTERISTICS**

The project consists of construction of a 1.7-acre parking lot. The parking lot would be located at the former Colston Youth Center site and extend an additional 150 feet to the north (see Figure 1).

### **2.4 PROJECT COMPONENTS**

The approximately 1.7-acre parking lot would be composed of asphalt concrete and include the following features:

- 139 standard parking spaces (9 by 18-foot).
- Two bi-directional access driveways from Hillmont Avenue.
- Ten LED light fixtures mounted on 28-foot-tall light standards, focused downwards to provide security lighting.
- Trees will be provided in parking islands throughout the proposed parking lot.
- Irrigated landscaping along Hillmont Avenue (approximately 10 feet wide, or about 3,600 square feet).
- A 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bio-swale.
- Screening landscaping immediately east of the storm water treatment area (approximately six feet wide, or about 570 square feet).
- Fencing along the perimeter of the storm water treatment area.

A preliminary parking lot plan is provided as Figure 3; however, the layout details may be subject to revision as the design progresses.

## **2.5 OPERATION**

The proposed parking lot would serve VCMC, including staff, patients and visitors. Parking lot maintenance including landscape irrigation and maintenance, litter control, pavement repairs and storm water treatment maintenance would be the responsibility of VCMC.

## **2.6 CONSTRUCTION**

### **2.6.1 General Characteristics**

Parking lot construction is anticipated to require about 75 workdays and would be initiated in July 2023. Construction would be primarily limited to normal working hours between the hours of 8 a.m. and 5 p.m., Monday through Friday, with occasional work on Saturday.

### **2.6.2 Work Area**

The work area comprises approximately 1.7 acres, at the former Colston Youth Center demolition site. Temporary materials staging and parking may extend north of the work area.

### **2.6.3 Access and Staging**

Staging and storage of parking lot construction materials and heavy equipment would occur primarily at the proposed parking lot site. However, temporary materials staging may extend to the vacant site north of the proposed parking lot site.

Peak daily construction traffic would be about 15 round trips (30 one-way trips) per day. Contractors and equipment would access the project site from Hillmont Avenue, either from Loma Vista Road or Foothill Road.

## **2.7 RESPONSIBLE AGENCIES AND PERMITS**

Project construction and operation would require the following permits and/or agency consultation:

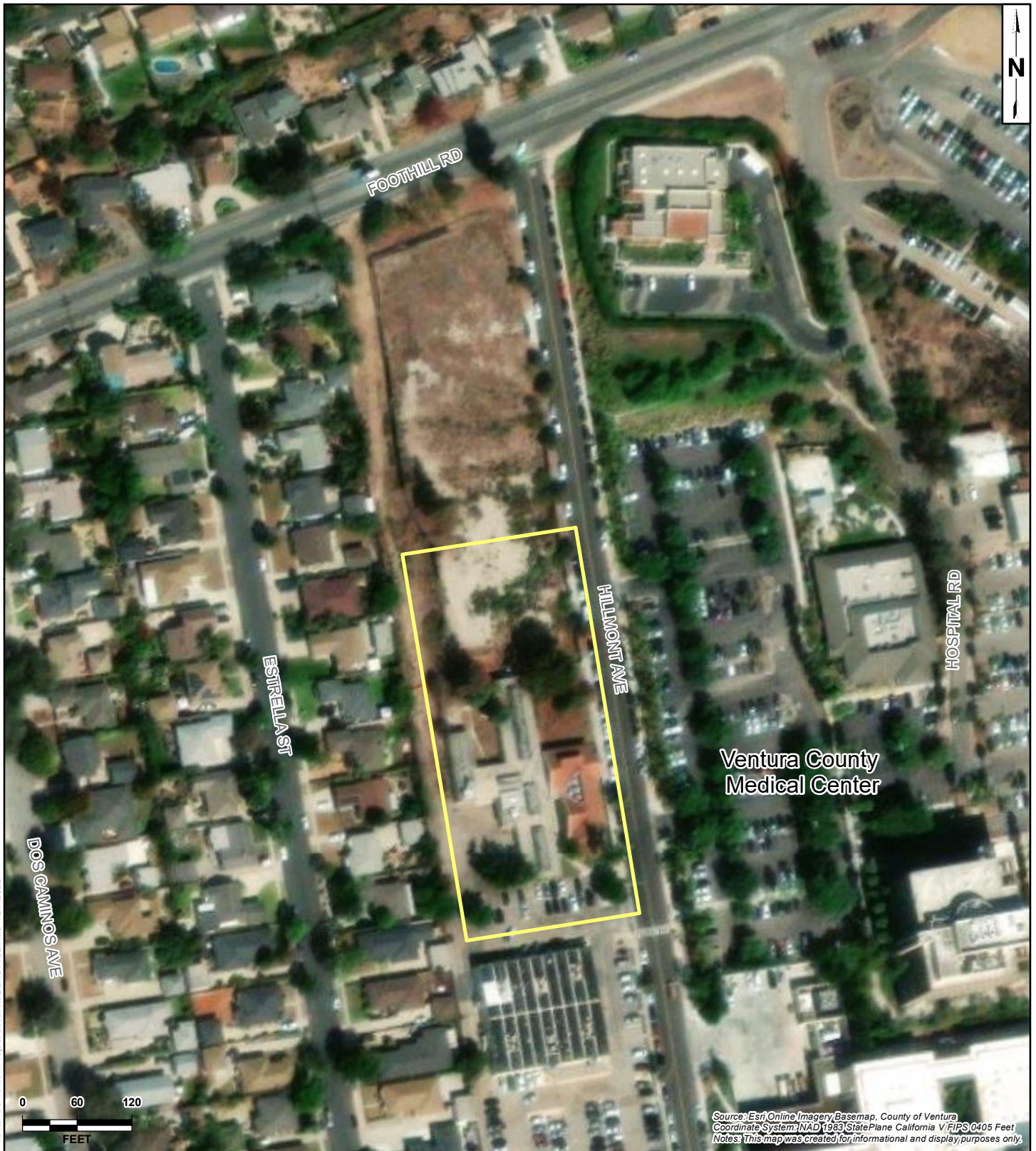
- Parking lot construction would require coverage under the General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities from the California Regional Water Quality Control Board, Los Angeles Region. However, this is not a discretionary action and the Regional Board would not be considered a responsible agency under CEQA.
- Project-related construction activities would be subject to best management practices required by the Ventura Countywide NPDES Municipal Stormwater Permit issued by the California Regional Water Quality Control Board, Los Angeles Region. However, this is not a discretionary action and the Regional Board would not be considered a responsible agency under CEQA.

- The project would be required by the Ventura Countywide NPDES Municipal Stormwater Permit to implement a post-construction stormwater management plan. However, this is not a discretionary action, and the Regional Board would not be considered a responsible agency under CEQA.


### **3.0 LAND USE SETTING**

The project site is located in the City of Ventura. City zoning for the project site is R-1-7 (residential). The project site is comprised of a 1.7-acre area located on Assessor's Parcel No. 074-0-170-080, a 7.04 acre parcel located west of Hillmont Avenue between Foothill Road and Loma Vista Road. VCMC is located immediately to the east of the project site, opposite Hillmont Avenue. To the north of the project site is an undeveloped area, part of which is proposed to be included in the new parking lot (see Figure 2.c). A small parking lot and portable buildings currently used for office space by the Ventura County Health Care Agency are located south of the project site. West of the project site is a single-family residential area along Estrella Street.

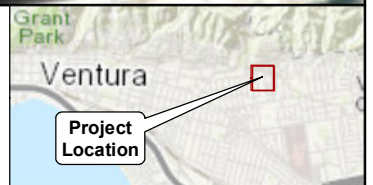




**LEGEND:**

 Parking Lot Site

**MAP EXTENT:**



**padre**  
associates, inc.  
ENGINEERS, GEOLOGISTS &  
ENVIRONMENTAL SCIENTISTS

PROJECT NAME:  
VCMC PARKING LOT IMPROVEMENTS  
VENTURA COUNTY, CA

PROJECT NUMBER:  
2102-4961

DATE:  
December 2022

**PROJECT LOCATION  
MAP**

**FIGURE  
1**





a. View from the VCMC parking lot, Hillmont Avenue in the foreground



b. View of the southern portion of the project site, facing south



c. View of the northern portion of the project site, facing north



d. View of the project site from the southern boundary





Note: All structures, paving, utilities and vegetation at the parking lot site were removed in November 2022 as part of the demolition of the former Colston Youth Center.

Source: Google Earth Imagery, Phoenix Civil Engineering  
Notes: This map was created for informational and display purposes only.



PROJECT NAME: VCMC PARKING LOT IMPROVEMENTS VENTURA COUNTY, CA	
PROJECT NUMBER: 2102-4961	DATE: December 2022

PARKING LOT PLAN

FIGURE  
3



## 4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section evaluates the potential environmental impacts of the proposed project. The analysis of potential impacts is consistent with methodology and impact threshold criteria presented in the Ventura County Initial Study Assessment Guidelines (Ventura County, 2011). Impact analysis is organized by environmental topic (e.g., air quality, water resources, etc.). The determinations of significance for project-level and cumulative impacts are summarized in the Initial Study Checklist, which is attached to this document. Cumulative impacts were assessed to determine if the project's incremental contribution would be considerable, such that an environmental impact report would be required. Cumulative impacts were considered significant if project-specific impacts would be significant. Growth inducement is discussed in a separate section following cumulative impacts.

### ISSUE 1: AIR QUALITY

**Setting.** Ventura County is located in the South Central Coast Air Basin. The topography and climate of Southern California combine to make the basin an area of high air pollution potential. Ozone and particulate matter less than 10 microns (PM<sub>10</sub>) are of particular interest in Ventura County because State air quality standards for these pollutants are regularly exceeded. The air quality of Ventura County is monitored by a network of five stations, operated by the California Air Resources Board (ARB) and the Ventura County Air Pollution Control District (APCD). The El Rio monitoring station is the nearest station to the project site, located approximately 6.4 miles to the east-southeast.

Table 1 lists the monitored maximum concentrations and number of violations of air quality standards for the years 2019 through 2021. As shown in Table 1, ozone concentrations monitored at the El Rio station rarely exceeded the State 1-hour standard and State 8-hour ozone standards from 2019 through 2021. PM<sub>10</sub> concentrations periodically exceeded the State 24-hour standard at the El Rio station from 2019 through 2021.

**Significance Thresholds.** The APCD has prepared Air Quality Assessment Guidelines (2003) for the preparation of air quality impact analyses. The Guidelines indicate that projects within the County would have a significant impact on the environment if they would:

- Result in daily emissions exceeding 25 pounds of reactive organic compounds (ROC) or oxides of nitrogen (NO<sub>x</sub>).
- Cause a violation or make a substantial contribution to a violation of an ambient air quality standard.
- Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted AQMP.
- Be inconsistent with the Ventura County Air Quality Management Plan (AQMP) and emit greater than 2 pounds per day ROC or NO<sub>x</sub>.

Due to the temporary, short-term nature of construction emissions, the APCD does not apply the quantitative emissions thresholds for ROC and NO<sub>x</sub> to construction activities. The APCD does require that emission reduction measures be implemented during construction to reduce exhaust emissions and fugitive dust generation.

**Table 1. Air Quality Summary**

Parameter	Standard	Year		
		2019	2020	2021
Ozone (O <sub>3</sub> ) – parts per million (El Rio station)				
Maximum 1-hour concentration monitored (ppm)	0.095 ppm	0.078	0.104	0.073
Number of days exceeding State standard		0	2	0
Maximum 8-hour concentration monitored (ppm)	0.070 ppm	0.070	0.087	0.067
Number of days exceeding State 8-hour standard		0	3	0
Particulate Matter less than 10 microns (PM <sub>10</sub> ) – micrograms per cubic meter (El Rio station)				
Maximum sample (µg/m <sup>3</sup> )	50 µg/m <sup>3</sup>	187.8	200.7	377.8
Number of samples exceeding State standard		14	21	12
Number of samples exceeding Federal standard	150 µg/m <sup>3</sup>	2	2	1
Particulate Matter less than 2.5 microns (PM <sub>2.5</sub> ) – micrograms per cubic meter (El Rio station)				
Maximum sample (µg/m <sup>3</sup> )		25.5	58.7	31.7
Number of samples exceeding Federal standard	35 µg/m <sup>3</sup>	0	3	0

**Sensitive Receptors.** Some land uses are considered more sensitive to air pollution than others due to population groups and/or activities involved. Sensitive population groups include children, the elderly, the acutely ill and the chronically ill, especially those with cardio-respiratory diseases. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present.

The nearest sensitive receptors to the project site are:

- Residences on Estrella Street: as close as 35 feet to the west.
- Patients at VCMC: as close as 275 feet to the east.
- Patients at the Ventura County Public Health medical building: as close as 575 feet to the south.

## Part 1.a Regional

**Impacts (LS).** Air pollutant emissions would be generated during parking lot construction (primarily by heavy equipment and vehicles), and during operation of the proposed parking lot. However, the proposed parking lot would not generate new vehicle trips, only change the end point (parking space) of existing vehicle trips generated by the adjacent VCMC. Therefore, the proposed project would not generate any new long-term operational emissions.

Project-related construction air pollutant emissions were estimated using the OFFROAD 2021 and EMFAC 2021 emissions estimation models developed by the CARB. Estimated peak day project emissions (during earthwork) would be 35.0 pounds NO<sub>x</sub> and 3.3 pounds ROC. Although peak day NO<sub>x</sub> emissions would exceed the 25 pounds per day threshold established by the APCD, due to the temporary, short-term nature of construction emissions, the APCD does not apply the quantitative emissions thresholds for ROC and NO<sub>x</sub> to construction activities. The APCD does require that emission reduction measures be implemented during construction-type activities to reduce exhaust emissions and fugitive dust generation.

Projects that cause local populations to exceed population forecasts in the Air Quality Management Plan (AQMP) are considered inconsistent with the AQMP, as exceeding population forecasts can result in the generation of emissions beyond those which have been projected in the AQMP. The proposed project would not provide any housing or long-term employment opportunities; therefore, it would not result in any population growth. As such, the project would be consistent with the AQMP.

**APCD Emissions Reduction Measures.** Air pollutant emissions reduction measures recommended by the Ventura County APCD Air Quality Assessment Guidelines (revised 2003) will be incorporated into the project including:

- The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.
- Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during grading activities.
- All trucks shall be required to cover their loads as required by California Vehicle Code §23114.
- All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary.

- Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until plant growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- Signs shall be posted on-site limiting traffic to 15 miles per hour or less.
- During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.
- Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors, shall be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.
- Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated as needed to prevent blowing fugitive dust off-site.
- All project construction and site preparation operations shall be conducted in compliance with all applicable Ventura County APCD Rules and Regulations with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust) and Rule 10 (Permits Required).
- Signs displaying the APCD complaint line telephone number (805/303-3700 during business hours; 805/303-3708 after hours) shall be posted in a prominent location visible to the public.
- Off-road construction equipment shall utilize engines certified to the Federal Emissions Standard Category of Tier 3 or Tier 4, if available.

## **Part 1.b Local**

**Impacts (LS).** Fugitive dust would be generated by the operation of heavy equipment and vehicles during excavation and grading. Dust generation from these activities would be considered a significant impact if APCD Rule 51 is violated. Rule 51 states “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.” Fugitive dust generated by the project may be considered a nuisance by adjacent land uses. Therefore, fugitive dust reduction measures listed in Part 1a. above shall be incorporated into the project. Implementation of these measures would avoid significant local air quality impacts.

## **ISSUE 2: WATER RESOURCES**

### **Part 2.a Groundwater Quantity**

**Setting.** The City of Ventura currently receives 100 percent of its water from local water sources including surface water from Lake Casitas and the Ventura River, groundwater from three groundwater basins (Oxnard Plain, Santa Paula, and Mound basins), and recycled water. The City’s water supply capacity is 22,189 acre-feet and the current water supply is 15,744 acre-feet under current drought conditions (2020). Due to the continued drought conditions, water supplies will be significantly challenged with future water demands.

The City purchases treated water from Casitas Municipal Water District (Casitas). Lake Casitas is located in Ventura County and is dependent on local water supplies in the forms of local rainfall, the Ventura River Watershed, and local groundwater. Based on the 2017 agreement between the City and Casitas, Casitas shall supply the City with sufficient water to meet its in-district projected water demand. In the event that Casitas must enact its Water Efficiency and Allocation Program due to a water shortage, Casitas may adjust the City’s Allocation consistent with the percentage reduction for this Program stage. The City’s 2020 water supply capacity from Casitas is 5,421 acre-feet per year.

Water from the Ventura River is collected through facilities located at Foster Park, which include a surface diversion, subsurface collector, and shallow wells. The water is treated at the Avenue Treatment Plant prior to entering the City’s distribution system. The City’s current water supply capacity from the Ventura River is 4,200 acre-feet per year. However, the City’s ability to draw water from the Ventura River continues to be challenged and impacted by proposed regulatory and environmental constraints and pending litigations.

The City’s water supply capacity from its well in the Mound Basin is 4,000 acre-feet per year. The City’s water supply capacity from the Santa Paula Basin is 3,041 acre-feet per year. The City’s pumping allocation in the Oxnard Plain Basin is 4,827 acre-feet per year effective January 1, 2020. However, implementation of Basin’s groundwater sustainability plan may reduce the City’s allocation by 44 percent in 2040.

The project site is located within the Mound Subbasin of the Santa Clara River Valley Groundwater Basin. The Mound Subbasin spans 14,800 acres and underlies the central part of Ventura. Total storage capacity is estimated to be about 153,000 acre-feet. The majority of recharge to the Mound Subbasin is from percolation of surface flow in the Santa Clara River and other minor tributary streams. The Mound Subbasin was designated as medium priority by the California Department of Water Resources under the Sustainable Groundwater Management Act. The Mound Basin Groundwater Sustainability Agency (GSA) was created in 2017 by several agencies using a Joint Power Agreement and is comprised of the United Water Conservation District, the County of Ventura, the City of Ventura, the Mound Basin Ag Water Group (agricultural stakeholder), and an environmental stakeholder. The Mound Basin GSA is preparing a groundwater sustainability plan for submittal to the California Department of Water Resources.

City water supplies also include the Upper Ventura River Subbasin and the Lower Ventura River Subbasin. The Upper Ventura River Subbasin was designated as medium priority under Sustainable Groundwater Management Act. The Upper Ventura River Groundwater Agency was formed in 2016 and is in preparation of a groundwater sustainability plan. The Lower Ventura River Subbasin spans 5,300 acres and underlies the northwestern portion of Ventura. The Lower Ventura River Subbasin was designated as very low priority under the Sustainable Groundwater Management Act.

**Significance Thresholds.** Any project that would directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in an over-drafted aquifer, or creates an over-drafted groundwater basin would be considered to have a potentially significant impact.

**Impacts (LS).** Construction. A small amount of water (less than 0.5 acre-feet over the three to four month construction period) would be used for dust control and soil compaction. This water would be supplied by the City (likely from a metered fire hydrant). This temporary water use would not affect the City's ability to serve its customers or adversely affect groundwater management of the Mound Subbasin or other groundwater basins that supply water to the City.

Operation. The proposed parking lot landscaping (less than 0.1 acres) would be irrigated using potable water supplied by the City of Ventura. This small increase in VCMC's landscaping water consumption would not affect the City's ability to serve its customers or adversely affect groundwater management of the Mound Subbasin or other groundwater basins that supply water to the City.

## **Part 2.b Groundwater Quality**

**Setting.** Recorded concentrations of sulfate in some portions of the Mound Subbasin exceed the California sulfate secondary maximum contaminant level of 500 parts per million (ppm). The Ventura Water 2021 Consumer Confidence Report for Drinking Water shows an average of 655 ppm and a range of 563 to 797 ppm for sulfate concentration in groundwater, an increase from the average of 557 ppm and range of 445-669 identified in 2015. While the content and concentration of minerals in water is not static and there is variance over time in the ppm measured for groundwater in Ventura, the average ppm has increased and remained above the secondary maximum contaminant level almost every year since 2015. Nevertheless, this is not considered a limitation for using groundwater supplies from the Mound Subbasin (Ventura Water, 2021).

**Significance Thresholds.** Any land use proposal that would individually or cumulatively degrade the quality of groundwater and cause groundwater to fail to meet groundwater quality objectives set by the Basin Plan would be considered to have a significant impact.

**Impacts (NI).** The project would not generate wastewater or result in any discharge that may affect groundwater quality.

## **Part 2.c Surface Water Quantity**

**Setting.** The nearest natural drainage to the project site is the Hall Canyon drainage, located approximately 0.2 miles to the northwest. Substantial surface flow in the Hall Canyon drainage is present only after major storm events. This drainage is known as Prince Barranca within urban areas of the City and discharges to the Pacific Ocean near the Sanjon Road/Harbor Boulevard intersection.

Storm water from the project area flows south through storm drains to Arundell Barranca which discharges to the Ventura Harbor. Both Prince Barranca and Arundell Barranca are considered red-line channels, meaning they are maintained by the Ventura County Watershed Protection District.

**Significance Thresholds.** Any of the following effects would be considered a significant impact:

- Increase surface water consumptive use (demand), in a fully appropriated stream reach, or where unappropriated surface water is unavailable.
- Increase surface water consumptive use (demand) including but not limited to diversion and dewatering downstream reaches resulting in an adverse impact to beneficial uses designated in the Basin Plan.
- Inconsistent with General Plan goals and policies.

**Impacts (LS).** Construction. Water needed by the project for short-term construction uses would be provided by the City of Ventura, using a mixture of groundwater and surface water. The proposed project would not result in any increase in the City's consumptive use of surface water and would not be inconsistent with the City's General Plan policies.



**Operation.** The proposed parking lot landscaping (less than 0.1 acres) would be irrigated using potable water supplied by the City of Ventura. This use would not result in any increase in the City's overall consumptive use of surface water and would not be inconsistent with the City's General Plan policies.

## **Part 2.d Surface Water Quality**

**Setting.** The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) has jurisdiction over waters between Rincon Point (at the western boundary of Ventura County) and the eastern Los Angeles County line. The Regional Board has developed a Water Quality Control Plan, or "Basin Plan", to protect the quality of surface and groundwaters of the region. The Basin Plan designates beneficial uses of waters within the region, sets narrative and numerical water quality objectives to protect beneficial uses, and describes implementation programs intended to meet the Basin Plan objectives.

Storm water from the project site ultimately drains to the Ventura Harbor. Beneficial uses established for surface water in the Ventura Harbor (marina and/or Ventura Keys) are industrial service water supply, navigation, commercial and sport fishing, warm freshwater habitat, marine habitat, wildlife habitat and shellfish harvesting (LARWQCB, 2014).

Surface water of Ventura Harbor is considered impaired under Section 303(d) of the Clean Water Act, due to elevated levels of DDT, dieldrin, fecal coliform bacteria, indicator bacteria, PCBs and arsenic (SWRCB, 2021). A water body is impaired when data indicate that adopted water quality objectives are continually exceeded or that beneficial uses are not protected.

**Significance Thresholds.** The project would have a significant impact if it would individually or cumulatively:

- Degrade the quality of surface water and cause it to fail to meet surface water quality objectives designated in the Water Quality Control Plan developed by LARWQCB (2014).
- Directly or indirectly result in storm water quality to exceed water quality objectives of the County's NPDES storm water permit.

**Impacts (LS).** **Construction.** Storm run-off from the project site during the construction period may degrade surface water quality. The project would require coverage under the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities (Water Quality Order 2009-0009-DWQ). As required by the conditions of the General Permit, a Storm Water Quality Pollution Prevention Plan (SWPPP) would be prepared, which would include best management practices to be implemented and a monitoring program. The intent of the SWPPP would be to prevent construction-related pollutants from contacting surface water and prevent products of erosion from moving off site into receiving waters. The project would also be subject to the Development Construction Program of the Ventura County Municipal Separate Storm Sewer System Permit (RWQCB Order No. R4-2010-0108), which requires the implementation of a SWPPP. Implementation of the SWPPP and monitoring required under the General Permit and the County's Municipal Separate Storm Sewer Permit would prevent significant impacts to surface water quality.

**Operation.** The project would be subject to the Planning and Land Development Program of the Ventura County Municipal Separate Storm Sewer System Permit and must meet post-construction performance criteria and maintain stormwater facilities. The proposed project would comply with the Ventura County Municipal Separate Storm Sewer Permit by providing on-site storm water detention and treatment including retention of sediments and uptake of nutrients and pollutants by vegetation in the proposed bio-swale. Therefore, any project-related change in water quality in Arundell Barranca or the Ventura Harbor associated with storm water run-off from the project site would be less than significant.

### **ISSUE 3: MINERAL RESOURCES**

#### **Part 3.a Aggregate Resources**

**Setting.** Aggregate resources are defined as construction grade sand and gravel. The project site is located in an area designated as MRZ-1 by the State of California Division of Mines and Geology (CDMG, 1993). This designation indicates the area is not expected to contain significant aggregate deposits. The nearest aggregate mining operation in the project area is the Ojai quarry, located approximately 14.5 miles north of the project site.

**Significance Thresholds.** A project would have a significant impact if it would hamper extraction or access to aggregate resources, by being located in or immediately adjacent to any known aggregate resource area, or adjacent to a primary access road to an existing aggregate production facility.

**Impacts (LS).** The project site is not located within an area that may contain significant aggregate deposits. The proposed project would only use a minor amount of aggregate resources for parking lot construction, and would not generate any regional demand for aggregate resources or hamper future extraction of aggregate from the area. Therefore, the project would not have a significant impact on aggregate resources.

#### **Part 3.b Petroleum Resources**

**Setting.** Petroleum resources are defined as oil and gas deposits. The Ventura Oil Field is located approximately 1.8 miles north of the project site. The California Department of Conservation Geologic Energy Management Division's Well Finder website indicates the nearest active well to the project site is an oil well operated by Aera Energy, located approximately 2.4 miles to the north. There are no oil or gas processing facilities in the immediate project area.

**Significance Thresholds.** The project would have a significant impact if it would hamper extraction or access to petroleum resources, by being located in or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to an existing petroleum production facility.

**Impacts (NI).** The project site is not located within or adjacent to a petroleum resource area or petroleum production facility. Proposed construction activities would only use a minor amount of processed petroleum products as equipment and vehicle fuel and materials (asphalt) and would not affect the supply of petroleum in the County. In addition, the proposed project would not create a barrier to the extraction of petroleum resources, if discovered near the project site. Therefore, the proposed project would not impact petroleum resources.

## ISSUE 4: BIOLOGICAL RESOURCES

The project site was entirely disturbed by demolition of the former Colston Youth Center and does not support vegetation. Wildlife observed at the project site during a January 27, 2022 biological survey (prior to building demolition) included Anna's hummingbird, white-crowned sparrow, northern mockingbird, American crow, Eurasian collared dove, house finch, western scrub jay, lesser goldfinch, pocket gopher (burrows), house mouse (scat) and black rat (scat).

### Part 4.a Endangered, Threatened and Rare Species

**Setting.** Based on a site visit, literature research and review of the California Natural Diversity Data Base, the only listed or candidate species reported within two miles of the project site is the Monarch butterfly (Federal candidate). This species roosts during the fall and winter at Camino Real Park approximately 1.2 miles southeast of the project site. Annual Thanksgiving day counts conducted by the Xerces Society (2022) indicate this population has declined from 10,000 in 2011 to 18 in 2020, but somewhat rebounded to 4,874 in 2021.

**Significance Thresholds.** Project impacts would be considered significant if they would directly or indirectly reduce the population, reduce habitat area or restrict reproductive capacity of a rare, threatened, or endangered species of animal or plant.

**Impacts (NI).** The project site is surrounded by development and consists of recently disturbed areas (Colston Youth Center demolition site and parking lot site to the north). Native vegetation and wildlife habitat is absent. Proposed parking lot construction would not result in the loss of habitat for Monarch butterfly or other listed species. Therefore, the proposed project would not impact endangered, threatened or rare species.

### Part 4.b Wetland Habitat and Regulated Waters

**Setting.** The U.S. Army Corps of Engineers (Corps) has jurisdiction over waters of the United States (U.S.) under the authority of Section 404 of the Clean Water Act. The limit of jurisdiction in non-tidal waters extends to the ordinary high water mark and includes all adjacent wetlands. Waters of the U.S. are defined as:

"All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; including all interstate waters including interstate wetlands, all other waters such as intrastate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce."

The Corps and U.S. Environmental Protection Agency define wetlands as:

"Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

The project site is located in a developed area and does not include any drainages that could be considered waters of the U.S. or wetlands. The project site currently contributes storm run-off to Arundell Barranca which may support wetlands.

**Significance Thresholds.** A significant impact would result from the direct reduction of, or a substantial indirect impact to, a significant wetland habitat. Discretionary development that would result in significant impacts to significant wetland habitats are prohibited unless mitigation measures are adopted that would reduce the impact to a less than significant level. Resource agencies recognize the value of wetlands due to the extremely small area of wetlands remaining in California. However, no threshold has been developed to determine the significance of wetland loss for the purposes of CEQA.

**Impacts (NI).** The project site is not located in proximity to wetlands and would not result in the loss or degradation of wetlands. Project implementation would not substantially alter the volume of storm run-off from the project site to Arundell Barranca, and would not result in any indirect impacts to wetlands that may occur within Arundell Barranca.

#### **Part 4.c Coastal Habitat**

**Setting.** The project site is not located within the Coastal Zone.

**Significance Thresholds.** According to the State Coastal Act, any direct reduction in habitat area or indirect impact to a coastal habitat could be considered significant.

**Impacts (NI).** No project-related impacts to coastal resources would occur.

#### **Part 4.d Migration Corridors**

**Setting.** Wildlife migration corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Migration corridors may be local such as between foraging and nesting or denning areas, or they may be regional in nature. Migration corridors are not unidirectional access routes; however, reference is usually made to source and receiver areas in discussions of wildlife movement networks. "Habitat linkages" are migration corridors that contain contiguous strips of native vegetation between source and receiver areas. Habitat linkages provide cover and forage sufficient for temporary inhabitation by a variety of ground-dwelling animal species. Wildlife migration corridors are essential to the regional ecology of an area as they provide avenues of genetic exchange and allow animals to access alternative territories as fluctuating dispersal pressures dictate.

The project site is located in a developed area with arterial roadways to the north and south. These features tend to fragment habitat and reduce opportunities for wildlife movement, such that regional wildlife movement is not anticipated in the project area. The site does not provide any wildlife habitat or provide a link between habitat areas.

**Significance Thresholds.** A significant impact to a migration corridor would result if a project would substantially interfere with the use of the corridor by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development, or increased human presence. Any impact that would substantially interfere with the use of a migration corridor is considered significant.

**Impacts (NI).** The proposed construction of the new parking lot would not affect any known or potential wildlife movement corridors.

#### Part 4.e Locally Important Species and Communities

**Setting.** Based on literature research and review of the California Natural Diversity Data Base, special-status species within two miles of the project site are limited to two reptile species and one mammal species (see Table 2).

**Significance Thresholds.** Project impacts would be considered significant if they would substantially affect a locally important species, or habitat for the species.

**Impacts (NI).** The project site is located within a developed area and does not support native vegetation or wildlife habitat. Therefore, loss of habitat for, or indirect impacts to special-status species are not anticipated.

**Table 2. Special-Status Species Reported within Two Miles of the Project Site**

Common Name ( <i>Scientific Name</i> )	Status	Nearest Known Occurrence to the Project Site
<b>Reptiles</b>		
California legless lizard ( <i>Anniella</i> sp.)	CSC	Near Sunset Drive, 0.3 miles to the northwest (CNDDB, 2022)
Western pond turtle ( <i>Emys marmorata</i> )	CSC	Near Harbor Boulevard, 1.4 miles to the south (CNDDB, 2022)
<b>Mammals</b>		
Mexican long-tongued bat ( <i>Choeronycteris mexicana</i> )	CSC WBWG-H	Ventura area (non-specific, CNDDB, 2022)

Status Codes: CSC California Species of Special Concern (CDFW)  
WBWG-H Western Bat Working Group-High Priority

## ISSUE 5: AGRICULTURAL RESOURCES

### Part 5.a Agricultural Soils

**Setting.** The project site is located in an area mapped as “Urban and Built-up Land” by the California Department of Conservation. The nearest farmlands (orchards) are located approximately 0.3 miles to the north which have been classified as Unique Farmland by the California Department of Conservation. The soils of the project site have been mapped as Sorrento loam-2 to 9 percent slopes (Edwards et al., 1970).

**Significance Thresholds.** The project would have a significant impact if it would either directly or indirectly result in the loss of important agricultural soils exceeding thresholds in the Initial Study Assessment Guidelines.

**Impacts (NI).** Project-related disturbance would be limited to developed or previously disturbed areas. No loss of any crops, agricultural soils or lands would occur.

## **Part 5.b Land Use Incompatibility**

**Setting.** The nearest farmland are orchards located approximately 0.3 miles north of the project site. This area has been classified as Unique Farmland by the California Department of Conservation.

**Significance Thresholds.** The project would have a potentially significant impact if it would be located within 300 feet of classified farmland (without vegetative screening), unless it qualified for a waiver or deviation from the distance standard.

**Impacts (NI).** The project site is not located within 300 feet of classified farmland. The project would not interfere with the existing zoning or designated land uses for this area or its adjacent properties. Therefore, the project would not result in impacts to agriculture relating from land use incompatibilities.

## **ISSUE 6: SCENIC RESOURCES**

**Setting.** The City's General Plan indicates that views of beaches, hillsides, ocean, barrancas and rivers should be protected and restored. The project site is not visible from any City-designated scenic routes or State scenic highways. In addition, the parking lot site north of the building is weedy and unmaintained with relatively low visual quality.

**Significance Thresholds.** A project would have the potential to significantly impact scenic resources if it would involve a scenic resource visible from a public viewing location; and would physically alter the scenic resource, or substantially obstruct, degrade or obscure a scenic vista.

**Impacts (NI).** The proposed project involves the construction of a parking lot at a demolition site and adjacent weedy lot with low visual quality. No impacts to scenic roadways or scenic areas would occur. Overall, the project-related change in visual quality and character would be beneficial.

## **ISSUE 7: PALEONTOLOGICAL RESOURCES**

**Setting.** A record search was conducted of the on-line collections data base of the University of California Museum of Paleontology. Pleistocene fossils (foraminifera, a bivalve, gastropods, unidentified mammoth) have been reported from Hall Canyon (about one mile north of the site). The project site is underlain by Holocene alluvial fan deposits (Tan et al., 2003). Geologic formations of paleontological importance as defined in the Initial Study Assessment Guidelines do not occur at the project site.

**Significance Thresholds.** The project would have a significant impact if it would result in the loss of or damage to important paleontological resources. Paleontological resources are important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental reconstruction, represent rare and or endemic taxa, represent a diverse assemblage, or represent associated marine or non-marine taxa.

**Impacts (NI).** All ground disturbance associated with the proposed project would be located within areas previously disturbed by demolition of the former Colston Youth Center building or previously graded areas (north of the building site). Therefore, no disturbance of potentially fossil-bearing formations would occur. As such, project construction activities would not result in impacts to known or suspected paleontological resources.

## **ISSUE 8: CULTURAL RESOURCES**

### **Part 8.a Archeological Resources**

**Setting.** The project site lies within the historic territory of the Native American Indian group known as the Chumash. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast, and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands (Grant, 1978). Chumash society developed within its historic boundaries for over 7,500 years based on the continuity of mortuary practices, as well as the development of artifacts used in social activities. Prior to colonization by the Spanish, the long period of development of Chumash society was possible since the Santa Barbara Channel area contained a higher concentration of resources than adjacent areas, and the society occupying this area was more powerful than the surrounding societies. The length of time during which the indigenous Santa Barbara Channel society developed was long compared to the majority of extant societies, which acquired their territories more recently. At the time of the first European contact, Chumash society was uniquely adapted to its environments, and well organized as a result of their evolution over long periods of time.

**Evidence of Earliest Occupation.** Knowledge of occupations during the Pleistocene in the study area is very limited. This is due to the small size of early groups, and since charcoal, bones, and shells are not as likely to be preserved in earlier sites. Some early coastal sites were probably inundated or eroded away by the rise in sea level, associated with the melting of ice at the end of the Pleistocene. Also, it is difficult to define the earliest occupations at most early sites due to poor preservation of stratigraphic features. The earliest date of human occupation in Ventura County has not been determined, although it is believed that the area was settled prior to 11,000 years ago, since archaeological evidence does exist elsewhere throughout North America. The end of the Pleistocene was marked by climatic warming and resulting changes in environmental conditions, which led to extinction or geographical displacement of most large Pleistocene animals. The changes in plants and animals caused by a changing environment, coupled with the growth of human populations, resulted in changes in subsistence patterns.

**Early Period.** This period dates to approximately 6000-600 B.C., is the first period identified by archaeologists in California that contains the preserved remains of permanent settlements with associated cemeteries. Types of ornaments, charms, and other artifacts changed little throughout the period, although the numbers of artifact types increased, indicating a growth in social complexity. Several cemetery and residential contexts have been excavated in Chumash territory that are approximately 7000 years old. Artifacts and food remains recovered from these contexts indicate that people living along the coast were fishing with bone hooks, using boats or rafts to trade with the Channel Islands, and occasionally were taking sea mammals and large fish. The presence of deer bones, other animal bones, stone points, and knives indicates that hunting was also important.

Most early settlements consisted of small hamlets defensively situated on elevated landforms. During the Early Period, some settlements increased in size with the largest containing several hundred people. Large settlements were often less defensively situated than their smaller predecessors. Analysis of artifacts used to maintain social relationships and their distribution in mortuary contexts indicates that political power was largely dependent on the acquisition of wealth and ritual power (King, 1990 and 2000).

Differences in the contents of burial lots found at large and small Early Period settlements on Santa Cruz Island indicate that the occupants of large ceremonial centers had more valuable ceremonial regalia than those of small settlements. The inhabitants of small villages probably lived at more than one settlement during the year, and the inhabitants of large settlements may have maintained only one residence. Although the Early Period settlement pattern apparently resulted in the formation of many sites which were not continuously inhabited, the degree to which the population was sedentary may differ little from the Protohistoric Period.

Middle Period. The end of the Early Period and the beginning of the Middle Period (ca. 600 B.C.) is marked by changes in ornaments and other artifacts, as well as changes in the organization of cemeteries, which indicate the development of hereditary control of political and economic power. The presence of separate cemetery areas containing a predominance of either ritual objects or wealth objects at early Middle Period sites indicates the presence of a system of checks and balances between chiefs and priest-judge executioners. At the beginning of the Middle Period, the more powerful ritual objects, such as stone pipes, libation vessels, stone effigies, and pointed charmstones, were owned by people who were not political leaders but who had inherited rights to perform rituals. Similar systems of checks and balances were necessary to maintain stability in social systems throughout California, and these systems evolved shortly after the development of hereditary leadership positions. Similar changes in social organization occurred at the time of the Early-Middle period transition throughout North America and were accompanied by migrations into areas that were marginal to major population centers.

Late Period. Differentiation of bead types indicates the development of new economic subsystems. After ca. A.D. 1000, there was a rapid growth of systems which culminated in the highly developed economic system observed by the Spanish explorers. After the 1542 Cabrillo voyage, many small Chumash settlements were abandoned and some of the largest historic towns were founded. This change in population distribution can be attributed to growth in importance of trade centers and the development of more integrated political confederations, which were necessary to encourage trade. Since environments of people living in inland valleys lacked marine resources, fish and other sea foods were obtained from people living on the coast and from islanders trading at mainland coastal villages. The pooling of resources, which resulted from the development of their economic system, served to reduce the negative effects of local crop failures (King, 1976 and 1990).



Religious institutions regulate behavior by molding perceptions of society and the physical world. Changes in the types and distributions of objects used in ritual contexts indicate corresponding changes in religious systems. The rarity of ritual objects in Late Period burial lots reflects control over religion by institutions that owned the ritual objects. By the Late Period, more powerful objects were controlled by institutions. Changes in whistles, historically used in the organization of ceremonies, indicate a growth in the importance of organized ceremonies. Objects associated with supernatural power, such as charmstones, effigies, and sunstick stones, did not change greatly over time. It appears that most Chumash religious ceremonies had their roots in the Early Period when objects similar to those used historically were regularly placed in mortuary associations and owned by religious leaders.

Ethnography. At the time of historic contact, the project area (Ventura County) was occupied by the Ventureño branch of the Chumash, who were a Hokan speaking people. The Chumash achieved a cultural complexity unique for hunter and gatherer groups in California. They possessed a stratified society containing an upper, middle, and lower class. Moreover, attributes usually attributed to chiefdom societies, such as ownership of resources/property, craft specialists, large permanent population centers (villages), a sodality consisting of religious elitists (*Antap*), and a market economy, were all a part of Chumash culture at the time of historic contact (Blackburn, 1974).

Politically, there were at least six ethnographically known Chumash provinces. The following are the provinces from north to south and their corresponding capitals, respectively: 1) Gaviota (capital at *Shisholop* or *Upop*); 2) Dos Pueblos (capital at *Mikiw*); 3) Santa Barbara (capital at *Synhten*); 4) Ventura (capital at *Shishopop*); 5) Mugu (capital at *Muwu* or *Simomo*); and 6) Malibu (capital at *Humaliwu*). In addition, there were apparently two religious federations, *Muwu* and *Upop* (Hudson and Underhay, 1978).

All high status (Wots and shamans) or wealthy people were required to join a religious sodality known as the *Antap*. The *Antap* was the principal religious cult which dominated all aspects of Chumash religious and political society at the time of Spanish contact. Chumash religion could be accurately described as celestial, revolving around the worship of the sun, and various stars and planets comprising the Chumash pantheon (Sky People) (Blackburn, 1975).

Traditionally, the Chumash were noted by the Spanish for their large domed houses, wood and stone craftsmanship, basketry, and foremost for the plank canoe (*tomol*). The implementation of the Spanish Mission system brought about a precipitous decline in the Chumash culture, with a disruption of the traditional social structure and a steady demise of the native population, caused in part by European diseases. This cultural decimation continued and perhaps was amplified during the post mission or Mexican period, until their near cultural extinction in the later Anglo (American) period. Chumash culture has been documented by John P. Harrington and C. Hart Merriam, and well summarized by Blackburn, Hudson, and others.

**Records Search.** On December 22, 2021, Padre's senior archeologist ordered a cultural records search from the South Central Coast Information Center, an affiliate of the State of California Office of Historic Preservation and the official state repository of archaeological records and reports for Ventura, Los Angeles, San Bernardino, and Orange counties. Padre received the record search results on February 8, 2022. The records search included a review of all recorded historic-era and prehistoric archaeological sites within a 0.25-mile radius of the Project site as well as a review of known cultural resource surveys and technical reports. The State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Points of Historic Interest, and the California Office of Historic Preservation Archaeological Determinations of Eligibility also were analyzed.

The records search did not identify any cultural resources within the project site; or within the 0.25-mile search radius. A search of the Sacred Lands file housed at the Native American Heritage Commission did not indicate the presence of Native American cultural resources within the project site.

**Tribal Consultation.** On January 20, 2022, the Public Works Agency formally notified Ms. Julie Tumamait-Stenslie of the Barbareno/Ventureno Band of Mission Indians and Mr. Rudy Ortega of the Fernandeno-Tataviam Band of Mission Indians via certified mail of the decision to undertake the proposed project to allow the tribes to request consultation under Section 21080.3.1(d) of the Public Resources Code. These two tribal representatives are the only traditionally and culturally affiliated contacts that have requested consultation notification from Ventura County. No response has been received from these contacts.

**Significance Thresholds.** The project would result in a significant impact if it would result in the loss or destruction of unique archeological resources. An archeological resource is considered unique when it:

- Contains information needed to answer important scientific research questions and there is demonstrable public interest in that information;
- Has a special and particular quality such as the oldest of its type or best available example of its type, or;
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to archeological resources are considered significant if they would demolish or materially alter in an adverse manner those physical characteristics that convey archeological significance.

**Impacts (LS).** The record search did not identify any archeological resources within the project's area of potential effect. All ground disturbance associated with the proposed project would be located within areas previously disturbed by demolition of the Colston Youth Center and the adjacent construction staging area used repeatedly for VCMC projects. In addition, the proposed depth of excavation would be limited to a few feet and would not extend into previously undisturbed areas. Therefore, impacts to archeological resources or discovery of cultural artifacts is not anticipated.

## **Part 8.b Historical Resources**

The following is a summary of a Historical Resources Report prepared for the former Colston Youth Center by Post/Hazeltine Associates.

**Setting.** The project site was part of Rancho Ex-Mission San Buenaventura lands. The property appears to have remained undeveloped until sometime in the early 20th century, when it was converted to agricultural use. The adjacent parcel to the east was the site of Ventura County Hospital. Founded in 1919, the hospital opened its Loma Vista Road facility in 1923. A 1927 aerial photograph of the area reveals the future location of the Colston Youth Center was uncultivated land, while the Ventura County Medical Center site to the east had been developed with several hospital-related buildings and the Juvenile Hall complex on the east side of Hillmont Avenue. Sometime between 1938 and the early 1940s, the future location of the Colston Youth Center was converted from open fields into an orchard. Sometime between 1958 and 1961, Hillmont Avenue was graded and paved between Loma Vista Road and Foothill Road.

The genesis of the Girls' Home was in 1962 when the Ventura County Juvenile Justice Committee, composed of members of the Ventura County Board of Supervisors and local jurists, examined the feasibility of building a facility for housing young females. The committee was tasked with studying the feasibility of creating a disciplinary school for "girls" ("Juvenile Group Meets: County Girls' School Studied," Oxnard Press Courier, January 10, 1962, pg. 3). By 1964, the County approved the concept and began planning for a bond measure to fund the project. In 1964 or early 1965, Frank Colston, the Ventura County Probation Officer, began planning to construct two facilities on Hillmont Avenue, one housing female juveniles named the "Girls' Home" and a juvenile court building. The courthouse would be located at the existing Juvenile Hall facility on the east side of Hillmont Avenue and the Girls' Home across the street on the west side of Hillmont Avenue. The Girls' Home was at what is now 375 Hillmont Avenue. Initially, the County of Ventura proposed two construction phases for the facilities, which Ojai architect Chalfant Head had designed. However, in 1965, the Ventura County Board of Supervisors approved the submittal of an augmented bond measure to fund the construction of the complex in one phase with the addition of a parking lot and an increase in the number of beds from 16 to 33 (Oxnard Press Courier, August 11, 1965: "Juvenile court, girl's home bond issue hiked"). The projected cost for the Girls' Home was \$185,326.00, while the cost of the courthouse was projected to be \$127,729.00. The bond measure was approved, and construction of the buildings appears to have been completed in 1966.

Chalfant Head's architectural scheme was utilitarian in design with concrete block walls, shallow-pitched gable roofs covered in flat concrete tiles and metal frame single-light windows, and glazed steel or flush panel metal doors. The building was composed of several wings whose roofs featured monitor-style clerestories. With security being of paramount importance, windows and doors were generally limited in size and number as a security measure. The interior featured long hallways flanked by individual rooms, bathrooms, and rooms for staff. A dining hall and kitchens were also accommodated. Original interior finishes, such as painted concrete walls, vinyl flooring, and utilitarian metal light fixtures, were designed for durability.

In 1969, the Girls' Home was renamed the Frank A. Colston Girls' Home in honor of Frank A. Colston's long career as Ventura County's Probation Officer. That same year, the Board of Supervisors approved the establishment of an educational facility at the Frank A. Colston Girls' Home at their October 6th meeting and renamed the facility the Frank A. Colston Girls' Home Elementary School (Summary of the Proceedings of the Ventura County Board of Supervisor for the Regular Meeting of October 6, 1969). In 1976 to 1977, the facility transitioned to a mixed population of both males and females. Consequently, its name was changed to the Frank A. Colston Youth Center. In 1991, a substantial addition was made to the building's east elevation to accommodate ten beds for females and additional office space ("10 More Beds OK'd for Juvenile Center," Los Angeles Times, May 30, 1990). The new wing was designed to emulate the architecture of the original building. Construction of the wing removed a small section of the original east elevation and obscured views from Hillmont Street to the original street façade. By the mid-1980s, the facility had transitioned to a counseling and short-term holding center for youths serving sentences of six or fewer months. In 2006, the Frank A. Colston Youth Center was closed, and its services transferred to a facility in the City of Oxnard.

The former Colston Youth Center is not listed in the California Register of Historical Resources or a local register, nor is it eligible for listing because:

- The building is not associated with events that have made significant contributions to the broad patterns of our history: while the building served as Ventura County's female youth facility between 1965 and 1969, this association does not rise to a level of significance that would make the building eligible for listing, especially as it was only one of several facilities operated by the Ventura County Probation Department between the early 1940s and the 1990s. Moreover, the ability of the building to convey its association with the Ventura Girls' Home has been diminished by changes made to the building after it was converted to a mixed facility housing both males and females. These included constructing a large addition that removed the original entry, altered the building's fenestration, and added a wing that obscured most of the original street façade from view.
- The building is not associated with the lives of persons significant in our past: the strongest historical association is with Frank A. Colston, Ventura County's longest-serving probation officer, whose contributions to the expansion and modernization of the County's probation department were substantial. They were commemorated by the renaming of the Ventura Girls' Home, the Frank A. Colston Girls' Home, and later the Frank A. Colston Youth Center. The building's ability to convey this association was substantially diminished when the building was extensively altered after his retirement in 1973. Therefore, the building, which can no longer convey its appearance during Colston's tenure as Ventura County's Probation Officer.

- The building does not embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values: in its current state of preservation, the building most effectively conveys its appearance after its remodeling in 1991 rather than the scheme designed by Chalfant Head.

In any case, the former Colston Youth Center was demolished in November 2022. The project site does not support any historical resources.

**Significance Thresholds.** Section 15064.5 of the State CEQA Guidelines defines historical resources as:

- A resource listed in or determined to be eligible for listing in the California Register of Historical Resources;
- A resource included in a local register of historic resources;
- An object, building, structure, site, area, place, record or manuscript which a lead agency determines to be historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California.

Generally, a resource must meet at least one of the following criteria to be considered “historically significant”:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or methods of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

Based on Section 15064.5 of the State CEQA Guidelines, a substantial adverse change in the significance of an historical resource is a significant effect on the environment. A “substantial adverse change” means “demolition, destruction, relocation, or alteration of the resource such that the significance of an historical resource would be materially impaired.” The significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;

2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

**Impacts (NI).** The project site does not support any historical resources; therefore, proposed parking lot construction would not result in any impacts to historical resources.

## **ISSUE 9: COASTAL BEACHES AND SAND DUNES**

**Setting.** The nearest coastal beach (San Buenaventura State Beach) is located approximately 1.5 miles to the southwest of the project site. The nearest sand dunes are located at McGrath State Beach. Sediment transported by the Ventura River replenishes sand at these beaches.

**Significance Thresholds.** The project would have a significant impact if it would be inconsistent with goals and policies of the Ventura County General Plan. Potential impacts may include any direct impacts (i.e., physical removal or modification) or indirect impacts (i.e., creation of barriers to sand replenishment or disturbance of dune vegetation) of a project on these resources should be fully mitigated. Otherwise, a significant impact would occur.

**Impacts (NI).** The proposed project would not directly affect any beaches or sand dunes and would not affect sediment transport which supplies sand to these areas.

## **ISSUE 10: FAULT RUPTURE HAZARD**

**Setting.** The entire Southern California region, including the Ventura area, is located within a seismically active area. The nearest fault (Ventura) is considered active (Holocene era displacement) and located adjacent to the project site (California Department of Conservation, 2022). The project site is located within a designated Alquist-Priolo Special Studies Zone (California Department of Conservation, 2003).

**Significance Thresholds.** The project would have a significant impact if it would place persons or property at risk of loss of life or damage due to fault rupture.

**Impacts (NI).** The proposed project does not involve any habitable structures that may increase the number of persons exposed to existing fault rupture hazards and would not increase the potential for adjacent properties to be affected by existing fault rupture hazards.

## ISSUE 11: GROUND-SHAKING HAZARD

**Setting.** Ground-shaking is the cause of most damage during earthquakes. The project area has a 10 percent change of exceeding a peak ground acceleration of 0.64 g in 50 years in alluvium conditions (California Department of Conservation, 2003).

**Significance Thresholds.** Impacts from ground-shaking hazards are considered less than significant for projects of ordinary type and construction subject to the provisions of the Ventura County Building Code. Significant impacts from ground-shaking hazards would result for projects involving high-rise structures, critical facilities, and projects of unique design not covered by ordinary provisions of the Uniform Building Code. Such projects may subject persons and property to greater risk of loss of life or substantial damage during strong ground-shaking events.

**Impacts (NI).** The proposed project does not involve any habitable structures that may increase the number of persons exposed to existing ground-shaking hazards, and would not increase the potential for adjacent properties to be affected by existing ground-shaking hazards.

## ISSUE 12: LIQUEFACTION HAZARDS

**Setting.** Liquefaction occurs when strong, cyclic motions during an earthquake cause water-saturated soils to lose their cohesion and take on a liquid state. Liquefied soils are unstable and can subject overlying structures to substantial damage. The occurrence of liquefaction is highly dependent on local soil properties, depth to groundwater, and the strength and duration of a given ground-shaking event. The project site is located within a liquefaction hazard zone as designated by the California Department of Conservation (2003).

**Significance Thresholds.** The project would have a significant impact if liquefaction hazards would subject persons or property to loss of life or substantial injury or damage.

**Impacts (NI).** The proposed project does not involve any habitable structures that may increase the number of persons exposed to existing liquefaction hazards and would not increase the potential for adjacent properties to be affected by existing liquefaction hazards.

## ISSUE 13: SEICHE AND TSUNAMI HAZARDS

**Setting.** Tsunamis are seismically induced sea waves that can be of sufficient size to cause substantial damage to coastal areas. The last major tsunami in Southern California was in 1812, generated by an earthquake in the Santa Barbara Channel. The largest tsunami wave amplitude recorded in Ventura County was 8.8 feet, associated with the Chilean earthquake of 1960 (City of Port Hueneme, 1997). In 2010, an earthquake in Chile caused minor damage to structures and vessels in the Ventura Harbor. A tsunami generated by a volcanic eruption in Tonga in January 2022 caused minor damage to a few boats in the Ventura Harbor. The nearest tsunami inundation hazard area is located approximately 1.3 miles southwest of the project site (California Emergency Management Agency, 2009).

Seiches are oscillating waves that occur in enclosed or semi-enclosed bodies of water such as lakes and bays. Seiches are commonly caused by earthquakes. There is no record of a seiche occurring in Ventura County. The nearest body of water that may be subject to seiches is the Ventura Harbor, located approximately 2.1 miles south-southwest of the project site.

**Significance Thresholds.** Projects that would be located within an unmitigable tsunami hazard zone would have a significant impact. Project sites located within 10 vertical feet of a large, enclosed body of water may be considered to lie within a seiche hazard area.

**Impacts (NI).** The proposed project is not located in a tsunami hazard zone and would not increase the severity or the number of persons potentially affected by a tsunami. The proposed project is not located in a seiche hazard zone and would not increase the severity or the number of persons potentially affected by a seiche.

#### **ISSUE 14: LANDSLIDES/MUDFLOW HAZARD**

**Setting.** Areas of high landslide or mudflow potential are typically hillside areas with slopes of greater than 10 percent. The project site is not located within a seismically-induced landslide hazard area (California Department of Conservation, 2003).

**Significance Thresholds.** A project would have a significant impact if the project site would be affected by a landslide/mudflow hazard or contribute to landslides/mudslides that could not be mitigated.

**Impacts (NI).** The project site is located within a level area, with no slopes nearby. Therefore, project site would not be subject to hazards associated with landslides or mudslides.

#### **ISSUE 15: EXPANSIVE SOILS HAZARDS**

**Setting.** Expansive soils are primarily clay-rich soils subject to changes in volume with changes in moisture content. Based on the regional soil map, soils at the project site are mapped as Sorrento loam (2-9 percent slopes) with a moderate shrink-swell potential (Edwards et al., 1970).

**Significance Thresholds.** The project would have a significant impact if it would involve construction of unique structures that are especially susceptible to soil expansion in an area with highly expansive soils (i.e., with an expansion index greater than 20 are present).

**Impacts (NI).** Soils at the project site are not highly expansive. The proposed parking lot would not be substantially affected should excessive soil expansion occur. Damage to adjacent properties would not occur.

#### **ISSUE 16: SUBSIDENCE HAZARD**

**Setting.** Subsidence is generally related to over-pumping of groundwater or petroleum reserves from deep underground reservoirs. The project site is not located within a recognized subsidence area.

**Significance Thresholds.** The project would have a significant impact if it would cause or be subjected to a subsidence hazard (risk of loss, injury or death) that cannot be mitigated.

**Impacts (NI).** The project would not cause or exacerbate any existing ground subsidence and would have no impact.



## ISSUE 17: HYDRAULIC HAZARDS

### Part 17.a Non-FEMA (Flooding, Erosion & Siltation)

**Setting.** Generally speaking, erosion is the wearing away of soil and rock by weathering, mass wasting, and the action of streams, glaciers, waves, wind and underground water. The process of deposition of sediment from a state of suspension in water or air is referred to as sedimentation or siltation.

**Significance Thresholds.** The project would have a significant impact if it would cause or substantially exacerbate flooding, erosion or siltation.

**Impacts (LS).** Storm water from the project area flows south through storm drains to Arundell Barranca which discharges to the Ventura Harbor. The project has the potential to increase stormwater run-off and contribute to flooding, erosion and siltation. However, the proposed project would be regulated under the Ventura County Municipal Separate Storm Sewer System Permit and would provide on-site stormwater detention and treatment. Therefore, potential flooding, erosion or siltation impacts are considered less than significant.

### Part 17.b FEMA

**Setting.** The nearest FEMA-regulated floodplain to the project site is Arundell Barranca, located approximately 1.2 miles to the southeast (Flood Insurance Rate Map panel 06111C0765E, effective January 20, 2010).

**Significance Thresholds.** The project would have a significant impact if it would be substantially affected by flooding or if it would increase flooding hazard at upstream or downstream locations. FEMA considers a flood elevation increase of 1 foot during a 100-year storm to be significant.

**Impacts (NI).** The project would not encroach on the 100-year floodplain and would not be adversely affected by floodwaters or cause an increase in floodwater elevations.

## ISSUE 18: FIRE HAZARDS

**Setting.** The project site is surrounded by developed lands and is not located in a very high fire hazard severity zone as mapped by the California Department of Forestry and Fire Protection. The proposed parking lot site north of the demolition area supports some weedy flammable vegetation; however, this area appears to be cleared periodically or sprayed with herbicide.

**Significance Thresholds.** Projects located in a high fire hazard area may have a significant impact if fire prevention measures such as brush clearance are not implemented.

**Impacts (NI).** The project site is not located in a high fire hazard area and is served by a City fire station at 41 S. Seaward Avenue located approximately 0.9 road miles away. Proposed parking lot construction would not increase any existing fire hazard at the site or adjacent areas.

## ISSUE 19: AVIATION HAZARDS

**Setting.** The Oxnard Airport is located approximately 5.7 miles south-southeast of the project site. The project site is not located within an airport planning area.

**Significance Thresholds.** The project would have a significant impact if it would be incompatible with the County's Airport Comprehensive Land Use Plan (Oxnard or Camarillo airports) or considered by the Ventura County Airport Land Use Commission as incompatible with safe airport operations (Santa Paula airport).

**Impacts (NI).** The project would not involve any activities or structures that may affect aviation facilities.

## ISSUE 20: HAZARDOUS MATERIALS/WASTE

### Part 20.a Materials

**Setting.** A "hazardous material" means any material that, because of its quantity, concentration, physical or chemical characteristics poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment.

Asbestos-containing materials (including floor tiles, tile mastic, carpet mastic, thermal pipe insulation, roof tiles) and lead-based paint were found in the former Colston Youth Center building (Citadel EHS, 2020). These materials were removed prior to demolition in August and September 2022 by Unlimited Environmental in compliance with State and local (Ventura County) requirements. Removal of hazardous materials was monitored by Citadel EHS including surveillance, air monitoring and dust wipe sampling. The Ventura County APCD issued an Approved for Occupancy Permit on October 12, 2022 verifying hazardous materials had been properly removed.

Review of the State Water Resources Control Board's Geotracker data base indicates there is a leaking underground storage tank (waste oil) case (closed in 1996) located approximately 0.2 miles southwest of the project site.

**Significance Thresholds.** Appendix G of the CEQA Guidelines indicates that a project would have a significant impact if it would create a public health hazard, expose people to a potential health hazard, or pose a threat to the environment. The County's Initial Study Assessment Guidelines indicate the significance of hazardous materials impacts of a project shall be determined on a case-by-case basis considering the following parameters:

- Individual or cumulative physical hazard of material or materials.
- Amounts of materials on-site, either in use or storage.
- Proximity of hazardous materials to populated areas and compatibility of materials with neighboring facilities.
- Federal, State, and local laws and ordinances governing storage and use of hazardous materials.
- Potential for spill or release.

- Proximity of hazardous materials to receiving waters or other significant environmental resources.

Projects designed to meet the applicable statutory and regulatory requirements (including underground storage tanks, business plans, risk management plan), CUP and Fire Code are not considered to have a significant impact.

**Impacts (NI).** Asbestos-containing materials and lead-based paint, were removed from the former Colston Youth Center building prior to demolition, such that earthwork associated with parking lot construction would not result in exposure of the public to these hazardous materials.

## **Part 20.b Hazardous Waste**

**Setting.** Hazardous materials are defined as any substance, which if improperly handled, can be damaging to the health and well-being of humans. Hazardous materials become hazardous waste when the material has been used for its original intended purpose and is going to be discarded or recycled.

**Significance Thresholds.** The storage, handling and disposal of all potentially hazardous materials shall be in conformance with the requirements set forth in the following regulations:

- Enabling Legislation: California Code of Regulations (CCR), Title 22, Division 4.5.
- California Health and Safety Code, Division 20, Chapter 6.5.
- Permit Requirements: Ventura County Ordinance Chapter 5 (Hazardous Substances), Article 1, (Certified Unified Program Agency).

**Impacts (NI).** The proposed project is limited to a parking lot serving existing medical land uses (VCMC) and would not involve the use or transportation of hazardous materials. Therefore, no hazardous waste would be generated, and no impacts would occur.

## **ISSUE 21: NOISE AND VIBRATION**

**Setting.** Noise is generally defined as unwanted or objectionable sound. Noise levels are measured on a logarithmic scale because of physical characteristics of sound transmission and reception. Noise energy is typically reported in units of decibels (dB). Noise levels diminish (or attenuate) as distance to the source increases according to the inverse square rule, but the rate constant varies with the type of sound source. Sound attenuation from point sources such as industrial facilities is about 6 dB per doubling of distance. Heavily traveled road with few gaps in traffic behave as continuous line sources and attenuate at 3 dB per doubling of distance. Noise from more lightly traveled roads is attenuated at 4.5 dB per doubling of distance.

Community noise levels are measured in terms of the A-weighted decibel (dBA). A-weighting is a frequency correction that correlates overall sound pressure levels with the frequency response of the human ear. Equivalent noise level (Leq) is the average noise level on an energy basis for a specific time period. The duration of noise and the time of day at which it occurs are important factors in determining the impact of noise on communities. Noise is more disturbing at night and noise indices have been developed to account for the time of day and duration of noise generation. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (DNL or Ldn) are such indices. These indices are time-weighted, and average acoustic energy values over a 24-hour period. The CNEL index penalizes nighttime noise (10 p.m. to 7 a.m.) by adding 10 dB and evening noise (7 p.m. to 10 p.m.) by adding 5 dB to account for increased sensitivity of the community during these hours. The Ldn index penalizes nighttime noise the same as the CNEL index but does not penalize evening noise.

The dominant source of noise in the project area is motor vehicle traffic on local roadways (Hillmont Avenue, Foothill Road, Loma Vista Road) and periodic use of landscaping maintenance equipment. Consistent with the Ventura County Initial Study Assessment Guidelines, noise sensitive uses are considered dwellings, schools, hospitals, nursing homes, churches and libraries. Existing noise sensitive uses in proximity to the project site include:

- Residences on Estrella Street: as close as 35 feet from the parking lot site.
- Anka-Ventura Crisis Residential Treatment Facility: 275 feet to the east.
- VCMC Family Medical Residency and Specialty Care Center: 280 feet to the east.

The nearest school (Loma Vista Elementary School) is located approximately 0.25 miles to the east.

Noise levels were measured at the project site and adjacent to a medical building at VCMC on January 27, 2022 using a Larson-Davis LXT Type 1 Precision Integrating Sound Level Meter. The Meter was calibrated using a Larson-Davis CAL200 Calibrator at 94 dBA. Noise data collected is summarized in Table 3. Primary noise sources were vehicle traffic on nearby roadways and gusty wind. Overall, ambient noise levels in the project area are relatively low.

**Significance Thresholds.** Section 10.650.130 of the City's Municipal Code provides exterior noise level restrictions for various land use zones. The daytime/evening (7 a.m. to 10 p.m.) noise level restriction of noise sensitive properties and residential properties is 50 dBA, and 45 dBA at night (10 p.m. to 7 a.m.). However, construction activities conducted between 7 a.m. and 8 p.m. are exempted from these noise level restrictions.

**Table 3. Ambient Noise Measurement Data Summary**

Location	Measurement Period	Noise Level (dBA Leq)	Estimated Wind Speed (mph)
Near the western property boundary, adjacent to 316 Estrella Street	838-858 a.m.	49.5	3-10
Near the western property boundary, adjacent to 356 Estrella Street	900-920 a.m.	51.0	5-15
VCMC parking lot, near Anka-Ventura Crisis Residential Treatment Facility	927-947 a.m.	54.8	10-20

**Impacts (LS).** Construction Noise. The proposed project would generate noise during the parking lot construction period. Noise sensitive receptors adjacent to the project site are residences and hospital buildings (VCMC). Noise levels would vary substantially during the construction period, and work may be suspended for a few weeks at a time during this period. Noise generated by the proposed project was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model, based on a peak day during parking lot construction. Modeled noise sources were a backhoe, wheeled loader, dozer and scraper (simultaneous operation). The modeled construction peak hour noise value at the closest residence is 80.5 dBA Leq and 67.8 dBA Leq at the closest hospital building. Construction work at the project site would not be conducted before 7 a.m. or after 8 p.m. in compliance with the City's Municipal Code. Therefore, noise impacts are considered less than significant.

Operational Noise. Operation of the proposed parking lot would generate noise associated with motor vehicle travel, doors shutting, voices and occasional car alarms. However, this noise is not anticipated to be detectable above the existing noise environment (including traffic noise from Foothill Road and Hillmont Avenue, noise from nearby parking lots). Therefore, operational noise is considered a less than significant impact.

Vibration. Construction activities would generate ground-borne noise and vibration. The peak day vibration level (PPV, based on the operation of a large dozer along the western project site boundary) was estimated as 0.057 inches/second at the nearest residence using California Department of Transportation's Transportation and Construction Vibration Guidance Manual. This vibration level would be distinctly perceptible but is less than needed to damage fragile buildings (0.1 PPV). Due to the short-term nature of these peak vibration levels, project-related ground-borne noise and vibration would be less than significant

## **ISSUE 22: DAYTIME GLARE**

**Setting.** Sources of light adjacent to the project site is limited to exterior lighting at adjacent residences, parking lots and hospital buildings.

**Significance Thresholds.** Section 24.415.110 of the City's Municipal Code requires off-street parking areas to be provided with exterior lighting. Such lighting must be designed to confine the lighting to the parking area such that there is no lighting splash beyond the site.

**Impacts (LS).** The proposed project does not include any features or surfaces that may produce daytime glare. However, the proposed parking lot would include lighting for safety purposes. The exterior lighting would be composed of ten Rayon T391LED fixtures mounted on 28-foot standards. These fixtures are a dome top light with LED elements producing 15,668 lumens focused downward, similar to existing parking lot lighting at VCMC. Based on a photometric plan prepared for the project, the proposed lighting would provide an average of 1.81 foot-candles of illumination within the parking lot, and 0.2 foot-candles near the western boundary of the parking lot, approximately 85 feet from the nearest residence. Therefore, proposed parking lot illumination would not substantially affect adjacent land uses.

### **ISSUE 23: PUBLIC HEALTH**

**Setting.** A public health issue is defined by the County's Initial Study Assessment Guidelines as a human health related issue, such as, but not limited to, vectors, bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health. Note that hazardous materials or waste that may adversely affect human health are addressed under Issue 20.

**Significance Thresholds.** Significance for public health related impacts must be determined on a case-by-case basis, and is related to project type, location, and other environmental factors.

**Impacts (LS).** The proposed project would not generate or be exposed to bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health. The proposed stormwater treatment area could support surface water attractive to mosquitoes which may be disease vectors. However, the period surface water is present would be very brief (immediately following storm events) such that a project-related increase in disease vectors is not anticipated.

### **ISSUE 24: GREENHOUSE GASES**

**Setting.** Greenhouse gases (GHGs) are defined as any gas that absorbs infrared radiation in the atmosphere. Climate change, often referred to as "global warming" is a global environmental issue that refers to any significant change in measures of climate, including temperature, precipitation, or wind. Climate change refers to variations from baseline conditions that extend for a period (decades or longer) of time and is a result of both natural factors, such as volcanic eruptions, and anthropogenic, or man-made, factors including changes in land-use and burning of fossil fuels. Anthropogenic activities such as deforestation and fossil fuel combustion emit heat-trapping GHGs, defined as any gas that absorbs infrared radiation within the atmosphere.

In 2021, the average contiguous U.S. temperature was 54.5°F, 2.5°F above the 20th-century average and ranked as the fourth-warmest year in the 127-year period of record. The six warmest years on record have all occurred since 2012. The December contiguous U.S. temperature was 39.3°F, 6.7°F above average and exceeded the previous record set in December 2015.

In efforts to reduce and mitigate climate change impacts, state and local governments are implementing policies and initiatives aimed at reducing GHG emissions. California, one of the largest state contributors to the national GHG emission inventory, has adopted significant reduction targets and strategies. The primary legislation affecting GHG emissions in California is the California Global Warming Solutions Act (Assembly Bill [AB] 32). AB 32 focuses on reducing GHG emissions in California, and requires the CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. In addition, two State-level Executive Orders have been enacted by the Governor (Executive Order S-3-05, signed June 1, 2005, and Executive Order S-01-07, signed January 18, 2007) that mandate reductions in GHG emissions.

In June 2008, CARB developed a Draft Scoping Plan for Climate Change, pursuant to AB 32. The Scoping Plan was approved at the Board hearing on December 12, 2008. The Scoping Plan proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, and enhance public health while creating new jobs and enhancing the growth in California's economy. Key elements of the Scoping Plan for reducing California's greenhouse gas emissions to 1990 levels by 2020 include:

- Expansion and strengthening of existing energy efficiency programs and building and appliance standards.
- Expansion of the Renewables Portfolio Standard to 33 percent.
- Development of a California cap-and-trade program that links with other Western Climate Initiative Partner programs to create a regional market system.
- Implementation of existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard.
- Targeted fees to fund the State's long-term commitment to AB 32 administration.

~~The Climate Change Scoping Plan was updated in May 2014, and again in November 2017. In 2016, the State Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. The 2017 update to the Scoping Plan indicated the State is on track to reduce GHG emissions to 1990 levels by the 2020 target, and focuses on strategies to achieve the 2030 target set by Executive Order B-30-15 and codified by SB 32. A 2022 update to the Scoping Plan is in progress, with the goal of achieving carbon neutrality by 2050.~~

The primary legislation affecting GHG emissions in California is the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). AB 32 (Nuñez; Chapter 488, Statutes of 2006) focuses on reducing GHG emissions in California and required the State to reduce GHG emissions to 1990 levels by 2020. CARB prepared a Draft Scoping Plan for Climate Change in 2008 pursuant to AB 32. The Climate Change Scoping Plan was updated in May 2014 and November 2017.

In 2016, the State met the AB 32 target, 4 years early. The State Legislature passed Senate Bill (SB) 32 (Pavley; Chapter 249, Statutes of 2016), which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. The 2017 update to the Scoping Plan focuses on strategies to achieve the 2030 target set by Executive Order B-30-15 and codified by SB 32.

Executive Order B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of GHGs from the atmosphere, including through sequestration in forests, soils, and other natural landscapes. CARB finalized the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on November 16, 2022 which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas emissions by 85 percent below 1990 levels no later than 2045.

**Significance Thresholds.** To date, GHG thresholds of significance have not been adopted by the City of Ventura or Ventura County. On November 8, 2011, the Ventura County APCD completed a staff report assessing several options and strategies in developing GHG thresholds for land development projects. Although no GHG thresholds were developed, the November 8, 2011 staff report stated that consistency with any GHG thresholds developed by the South Coast Air Quality Management District (SCAQMD) is preferred. On December 5, 2008, the SCAQMD governing board adopted an interim GHG significance threshold of 10,000 metric tons per year CO<sub>2</sub> equivalent (including amortized construction emissions) for industrial projects. Due to the lack of any other applicable threshold, this value is used in this analysis to determine the significance of the contribution of the project to global climate change.

**Impacts (LS).** Construction. Greenhouse gas emissions associated with project construction were estimated using CARB’s EMFAC 2021 Model and OFFROAD 2021 Model and emission factors provided in the California Climate Action Registry General Reporting Protocol. Estimated emissions of GHG associated with project implementation (parking lot construction) are 145.3 metric tons of CO<sub>2</sub> equivalent (MTCO<sub>2</sub>E) and the calculations are summarized in Table 4. Project GHG emissions would be less than the 10,000 MTCO<sub>2</sub>E per year threshold adopted for the Project; therefore, Project-related GHG emissions are considered a less than significant impact on global climate change.



**Table 4. Construction Greenhouse Gas Emissions Summary**

<b>Project GHG Sources</b>	<b>Metric Tons per Year CO<sub>2</sub> equivalent</b>
Heavy equipment	135.0
On-road vehicles	10.3
<b>Total</b>	<b>145.3</b>

Operation. The proposed parking lot would not generate new vehicle trips, only change the end point (parking space) of existing vehicle trips generated by the adjacent VCMC. Therefore, the proposed project would not generate any new long-term operational GHG emissions.

#### **ISSUE 25: COMMUNITY CHARACTER**

**Setting.** The project site is located on Assessor's Parcel No. 074-0-170-080 which is zoned residential but is partly occupied by institutional land uses supporting Ventura County Health Care Agency and Public Health operations. A single-family residential area is located immediately west of the project site.

**Significance Thresholds.** The project would have a significant impact to community character if it was:

- Inconsistent with the policies or development standards relating to community character of the City's General Plan.
- Individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects would introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community the project is located.

**Impacts (NI).** The project is consistent with applicable City of Ventura General Plan policies. The proposed project would not conflict with adjacent land uses or zoning designations for the site. Additionally, the project would not disrupt or divide the physical arrangement of surrounding uses. As such, impacts to community character would not occur.

#### **ISSUE 26: HOUSING**

**Setting.** The nearest residential area is located immediately west of the project site.

**Significance Thresholds.** The project would have a significant impact on housing if it would cause forced removal of four or more existing housing units or create substantial demand for new housing.

**Impacts (NI).** The project would not involve the removal of any existing housing. However, any project that would involve construction has the potential to generate a demand for construction worker housing. Employment opportunities generated by the construction phase of the project are not expected to generate a demand for housing, as the project-related demand would be short-term (five months) and are likely to be supplied by existing construction workers in the region.

## **ISSUE 27: TRANSPORTATION/CIRCULATION**

The following analysis is consistent with the Ventura County Initial Study Assessment Guidelines, which has not been updated to address revisions to the State CEQA Guidelines (Section 15064.3) regarding determining the significance of transportation impacts. These revisions focus on increases in vehicle miles travelled associated with proposed changes in land use. Since the proposed parking lot would serve existing land uses (VCMC), new trips or new vehicle miles would not be generated.

**Setting.** The project site is accessed from Hillmont Avenue, either from Loma Vista Road or Foothill Road. The most recent average daily traffic volume data (2007) available for affected roadways includes:

- Hillmont Avenue: 1,263.
- Loma Vista Road east of Hillmont Avenue: 11,367.
- Foothill Road east of Hillmont Avenue: 9,416.

### **Part 27.a Roads and Highways**

#### Level of Service

The quality of traffic service provided by a roadway system can be described through the Level of Service (LOS) concept. LOS is a standardized means of describing traffic conditions by comparing traffic volumes in a roadway system with the system's capacity. An LOS rating of A-C indicates that the roadway is operating efficiently. Minor delays are possible on an arterial with a LOS of D. Level E represents traffic volumes at or near the capacity of the highway, resulting in possible delays and unstable flow.

**Impacts (LS).** Construction. Peak day motor vehicle trips associated with construction are anticipated to be about 30. These traffic volumes would represent a small fraction (less than three percent) of existing daily traffic volumes and would be spread out over the workday. Therefore, project impacts to LOS on local roadways would be less than significant. Operation. Since the proposed parking lot would serve existing land uses (VCMC), new vehicle trips would not be generated.

#### Safety and Design of Public Roads

**Impacts (NI).** The project does not involve construction of a public road; therefore, no impacts to the safety and design of public roads would occur. Any project-related damage to public roadways would be repaired to City standards by the construction contractor.

### Safety and Design of Private Access

**Impacts (NI).** The project does not involve construction of a private road; therefore, no impacts to the safety and design of private access roads would occur.

### Tactical Access

**Setting.** Tactical access describes an organized system of roads that provides access to and from a project site in the event of any emergency or disaster. The project may have a significant impact with respect to tactical access if it would involve the construction of a public or private road with single access that is over 800 feet in length.

**Impacts (NI).** The project site is vacant such that emergency access is not required. The proposed parking lot would not require emergency access and would not hinder emergency access to adjacent land uses.

### **Part 27.b Pedestrian/Bicycle Facilities**

**Setting.** In the project vicinity, Class II bike lanes are provided on Foothill Road and Loma Vista Road. Sidewalks are provided along Hillmont Avenue for pedestrian use.

**Significance Thresholds.** A project that would cause actual or potential barriers to existing or planned pedestrian/bicycle facilities may have a significant impact. Projects that generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities may have a significant impact. Pedestrian overcrossings, traffic signals, and bikeways are examples of these types of facilities.

**Impacts (NI).** The proposed project would not adversely affect the use of Hillmont Avenue, Foothill Road and Loma Vista Road by bicyclists and pedestrians.

### **Part 27.c Bus Transit**

**Setting.** Bus service in the project site vicinity is provided by Gold Coast Transit with routes along Loma Vista Road and Telegraph Road. The nearest bus stop is on Loma Vista Road near Dos Caminos Avenue.

**Significance Thresholds.** A project may have a significant impact if it would substantially interfere with existing bus transit facilities or create a substantial demand for bus transit facilities or services.

**Impacts (NI).** The project would not involve the construction of housing or otherwise increase the population in the area. Therefore, the project would not result in an increase in demand for bus transit services, or adversely affect bus transit facilities. Project-related construction activities would not hamper access to bus stops or bus service.

### **Part 27.d Railroads**

**Setting.** The nearest tracks (Union Pacific Railroad) are located approximately 1.2 miles southwest of the project site.

**Significance Thresholds.** A project would normally have a significant impact on a railroad if it would substantially interfere with an existing railroad's facilities or operations.

**Impacts (NI).** The proposed project would not generate rail traffic or interfere with railroad operations. No impacts to railroads would occur.

#### **Part 27.e Airports**

**Setting.** The Oxnard Airport is located approximately 5.7 miles south-southeast of the project site. The project site is not located within an airport planning area.

**Significance Thresholds.** Incompatible land uses within 2 miles of an airport may have a significant impact.

**Impacts (NI).** The project would not conflict with airport operations, or adversely affect airport facilities.

#### **Part 27.f Harbor Facilities**

**Setting.** The nearest harbor is the Ventura Harbor, located approximately 2.0 miles to the southwest of the project site.

**Significance Thresholds.** The significance of impacts to harbors is determined by the harbor operator, which is the Ventura Port District for the Ventura Harbor.

**Impacts (NI).** The project would not increase harbor traffic, or adversely affect harbor facilities.

#### **Part 27.g Pipelines**

**Setting.** There are numerous pipelines in the project area, associated with historic or current oil and gas production, water supply, wastewater and natural gas. A standard utility investigation (i.e., Digalert, utility company contact) would be conducted to identify any pipelines within construction work areas.

**Significance Thresholds.** A project would have a significant impact if it would substantially interfere with, or affect the operations of an existing pipeline.

**Impacts (NI).** The project would not interfere with the operation of existing pipelines.

### **ISSUE 28: WATER SUPPLY**

**Setting.** The potable water needs of the area are served by local groundwater and surface water provided by the City of Ventura.

#### **Part 28.a Quality**

**Setting.** Domestic water is defined by the County of Ventura Initial Study Assessment Guidelines as a supply of potable water used for human consumption or connected to domestic plumbing fixtures in which the supply is obtained from an approved individual water supply system or a public water system operating with an unrevoked permit from the Ventura County Environmental Health Division or the California State Department of Health Services.

**Significance Thresholds.** The project would have a significant impact if it would result in the use of domestic water that does not meet applicable State Drinking water standards as described in Title 22 of the California Code of Regulations.

**Impacts (NI).** The proposed parking lot would not require a new domestic water supply. The very small water demand of proposed landscaping would be supplied by existing VCMC water lines and may include recycled water. No impacts to domestic water quality would result.

#### **Part 28.b Quantity**

**Significance Thresholds.** The project would have a significant impact if its demand for domestic water could not be met or if it would result in the withdrawal of groundwater in an over-drafted groundwater basin. The Ventura County Initial Study Assessment Guidelines requires each legal parcel requiring a domestic water source have a permanent supply of water for the proposed project, and requires the water supplier indicate in writing that a permanent source of water is available to serve the project.

**Impacts (LS).** The proposed parking lot would not require a new domestic water supply. The very small water demand of proposed landscaping would be supplied by existing VCMC water lines. Impacts to water quantity would be less than significant.

#### **Part 28.c Fire Flow**

**Significance Thresholds.** The project would have a significant impact if sufficient water flow would not be available to meet the firefighting needs of the project.

**Impacts (NI).** The proposed parking lot would not require fire protection services or any new fire water storage or transportation facilities. As such, no impacts with respect to fire flow are expected.

### **ISSUE 29: WASTE TREATMENT AND DISPOSAL FACILITIES**

#### **Part 29.a Individual Sewage Disposal Systems**

The project would not involve the use of any individual septic systems and would have no impacts in this respect.

#### **Part 29.b Sewage Collection/Treatment Facilities**

**Setting.** The 8-inch sewer lateral serving the project site was removed during demolition of the former Colston Youth Center building.

**Significance Thresholds.** The project would have a significant impact if it would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing sewer main or sewage treatment plant. If the project description includes improvements to existing, or construction of new sewer mains and/or sewage treatment plants which would then be capable of serving the project and other cumulative development, there would be a less than significant impact.

**Impacts (NI).** The proposed parking lot would not generate any wastewater. Therefore, no impact to sewage capacity would occur.

#### **Part 29.c Solid Waste Management**

**Setting.** Solid waste generated in the project area is disposed at the Toland Road Landfill by E.J. Harrison & Sons, under contract to the City.

**Significance Thresholds.** Any project that generates solid waste would have an impact on the demand for solid waste disposal capacity in Ventura County. However, unless the County has reason to believe that there is less than 15 years of disposal capacity available for County disposal, no individual project would have a significant impact on the demand for solid waste capacity. The Ventura County 2016 Integrated Waste Management Plan indicates over 15 years of disposal capacity is available. Therefore, no individual project would have a significant impact on the demand for solid waste capacity.

**Impacts (LS).** The proposed project may require disposal of solid waste such as remnant debris and earth materials not suitable for parking lot construction. The project would comply with the requirements of the Ventura County Public Works Integrated Waste Management Division, including recycling demolition debris, using recyclable construction materials, and recycling and reusing soil and green-waste. Solid waste impacts would be less than significant.

#### **Part 29.d Solid Waste Facilities**

**Setting.** Solid waste generated in the project area is disposed at the Toland Road Landfill.

**Significance Thresholds.** Solid waste facilities shall be in compliance with the following statutes and regulations and are subject to enforcement by the EHD/LEA:

- California Health and Safety Code
- California Code of Regulations, Title 14
- California Code of Regulations, Title 27
- California Public Resources Code

**Impacts (NI).** The proposed project does not involve a solid waste operation or facility and would not have an impact on solid waste facilities within the region.

#### **ISSUE 30: UTILITIES**

**Electricity: Impacts (NI).** Electrical service would be provided to the proposed parking lot for lighting purposes by extending existing VCMC service lines. The project would not disrupt service or require expansion of facilities; therefore, no impacts to electricity service would result.

**Natural Gas: Impacts (NI).** Natural gas service would not be required to serve the proposed parking lot. Therefore, no impacts to natural gas service would result.

**Communications: Impacts (NI).** Communications service would not be required to serve the proposed parking lot. Therefore, no impacts to communications service would result.



## **ISSUE 31: FLOOD CONTROL FACILITIES/WATERCOURSES**

### **Part 31.a Watershed Protection District Facilities/Watercourses**

**Setting.** Channels maintained by the Watershed Protection District near the project site are Prince Barranca (0.4 miles to the west) and Arundell Barranca (1.2 miles to the southeast).

**Significance Thresholds.** The project would have a significant impact if it would substantially change the flow rate (i.e., increased run-off), velocity, erosion potential, or capacity of flood control channels.

**Impacts (LS).** Storm run-off from the proposed parking lot would discharge to a storm drain south of the site, which ultimately empties into the Ventura Harbor via Arundell Barranca. The proposed parking lot would include a stormwater treatment system that would reduce peak storm run-off flows to approximately current levels associated with the existing Colston building site. The project would not involve reducing the capacity of any watercourses, contributing substantial flow that could cause erosion, deposition of material into watercourses or placement of structures that encroach on a watercourse.

### **Part 31.b Other Facilities/Watercourses**

**Setting.** No other flood control or erosion control facilities (not operated by the Watershed Protection District) occur in the immediate project area.

**Significance Thresholds.** The project would have a significant impact if it would substantially change the flow rate (i.e., increased runoff), velocity, erosion potential, or capacity of flood control channels. In reviewing a project for impacts, the following are to be given consideration:

- Deposition of sediment and debris materials within existing channels and allied obstruction of flow.
- Capacity of the channel and the potential for overflow during design storm conditions.
- Increased runoff and the effects on areas of special flood hazard and regulatory channels both on and off site.

**Impacts (NI).** No other flood control or erosion control facilities would be affected.

## **ISSUE 32: LAW ENFORCEMENT/EMERGENCY SERVICES**

**Setting.** The project area is served by the City of Ventura Police Department (patrol Beat 2), located at 1425 Dowell Drive. Emergency (paramedic) services would be provided from City fire station no. 2 at 41 S. Seaward Avenue located approximately 0.9 road miles away.

**Impacts (NI).** The proposed parking lot would not require additional law enforcement or emergency services personnel, equipment, or facilities. Therefore, no impact would result.

## **ISSUE 33: FIRE PROTECTION SERVICES**

### **Part 33.a Distance and Response**

**Impacts (NI).** The project site is located approximately 0.9 street miles from the City fire station no. 2 at 41 S. Seaward Avenue which is within the 5-mile threshold of significance for response.

### **Part 33.b Personnel, Equipment and Facilities**

**Impacts (NI).** No additional personnel, equipment or facilities would not be needed to serve the proposed project.

## **ISSUE 34: EDUCATION**

**Impacts (NI).** Employment opportunities generated by the construction phase of the project are likely to be supplied by existing construction workers within the County and would not have an impact on the demand for schools or public libraries. The proposed parking lot also would not generate any demand for schools or public libraries.

## **ISSUE 35: RECREATION FACILITIES**

### Local Parks/Facilities

**Setting.** The nearest local park in the area is Blanche Reynolds Park, located approximately 0.8 miles south of the project site.

**Significance Thresholds.** A project would have a significant impact on recreation if it would cause an increase in the demand for recreation when measured against the following standards:

- Local Parks/ Facilities: 5 acres of developable land (less than 15% slope) per 1000 population.
- Regional Parks/Facilities: 5 acres of developable land per 1000 population.
- Regional Trails/Corridors: 2.5 miles per 1000 population.

A project would have a significant impact on recreation if it would impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.

**Impacts (NI).** Employment opportunities generated by the construction phase of the project are likely to be supplied by existing construction workers within the County and would not have an impact on the demand for recreational facilities. The proposed parking lot also would not generate any demand for recreational facilities.

### Regional Parks/Facilities

**Setting.** A regional park is defined as an extent of land that, by its unique, natural character or unusual or extensive development, offers recreation opportunities that attract patronage from beyond the local vicinity without regard to physical, political, or municipal boundaries. The nearest regional park is Camino Real Park, located approximately 1.2 miles southeast of the project site.

**Impacts (NI).** The proposed project would not create a demand for recreational facilities and would not impede the use of any park. Therefore, no impacts to regional parks would occur.

#### Regional Trails/Corridors

**Setting.** Regional trails are intended to accommodate non-motorized recreational travel through areas removed from vehicular traffic. Regional trails/corridors should link major park and recreation facilities. Trails within Arroyo Verde Park (1.6 miles to the northeast) may be considered regional trails.

**Impacts (NI).** The proposed project would not adversely affect regional trails or generate new demand for such trails.

## **5.0 CUMULATIVE IMPACTS**

Cumulative impacts are defined as two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts. Under Section 15064 of the State CEQA Guidelines, the lead agency must identify cumulative impacts, determine their significance and determine if the effects of the project are cumulatively considerable.

### **5.1 CUMULATIVE PROJECT DESCRIPTION**

The following provides a list of larger projects (greater than 10,000 square feet or 10 residential units) in the City of Ventura that are likely to implemented at the same time as the proposed project (construction initiated, ongoing or completed within the next 12 months) that may result in substantial environmental impacts.

#### **5.1.1 City of Ventura Commercial Projects**

- Public Works Storage: 10,616 square feet of storage (under review).
- Hilton Hotel: 160 room hotel with restaurant and retail (under review).

#### **5.1.2 City of Ventura Mixed Use Projects**

- Saticoy Village: 10 apartment units, 36,780 square feet of commercial uses (under review).
- SRO (45 California Street): demolish office, construct 27 apartment units and 10,000 of commercial uses (under review).
- LOGUE: 125 condominium units, 10,000 square feet of commercial uses (under review).
- Front Street: 73 apartment units with 5,100 square feet of commercial uses (under review).

#### **5.1.3 City of Ventura Residential Projects**

- The Grove: 250 townhome and apartment units (under review).
- Scandia Village: 30 multi-family residential units (under review).
- Orchid Gardens: 18 unit apartment development (under review).
- Poli Housing: 17-unit condominium development (under review).

## **5.2 CUMULATIVE IMPACT ANALYSIS**

### **5.2.1 Air Quality**

Each of the projects listed in Section 5.1 would generate short-term construction emissions. Project construction activities would contribute to cumulative construction emissions, should construction of these projects occur at the same time as the proposed project. However, construction emissions of both the proposed project and other projects would be mitigated by standard measures required by the Ventura County APCD. Implementation of these measures is considered to prevent significant project-specific and cumulative air quality impacts from construction. Therefore, the incremental contribution of the project to cumulative air quality impacts from construction is considered less than significant.

Each of the projects listed in Section 5.1 would generate motor vehicle emissions associated with operation. Following construction, the proposed project would not generate new vehicle trips and would not contribute to cumulative long-term vehicle emissions.

### **5.2.2 Water Resources**

Stormwater run-off would occur during the construction period of each of the projects listed in Section 5.1 and may degrade surface water quality. However, a stormwater pollution prevention plan would be implemented during construction for the proposed project and other projects as required by the General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities (Water Quality Order 2009-0009-DWQ). Therefore, the incremental contribution of the project to cumulative surface water quality impacts from construction is considered less than significant.

Stormwater run-off would occur following the construction period of each of the projects listed in Section 5.1 and may exceed the capacity of local storm drains and degrade water quality. The proposed parking lot would include a stormwater treatment facility that would detain peak flows, retain sediment and improve water quality of stormwater run-off. Therefore, the incremental contribution of the project to cumulative surface water quality impacts from parking lot operation is considered less than significant.

### **5.2.3 Biological Resources**

Most of the cumulative projects listed above would be located in previously disturbed areas and would not result in the loss of native vegetation or wildlife habitat. The proposed project would not result in loss of native vegetation or wildlife habitat. Therefore, the cumulative biological impacts would be less than significant, and the project's contribution would not be considerable.

### **5.2.4 Cultural Resources**

Cumulative projects listed in Section 5.1 are primarily located in previously developed or disturbed areas and are unlikely to adversely affect intact archeological resources. However, similar to the proposed project, isolated resources may be discovered during construction-related ground disturbance. The proposed project would contribute to this cumulative impact; however, mitigation measures are provided to avoid and minimize potential impacts to archeological resources.

### **5.2.5 Noise**

Most of the projects listed in Section 5.1 may generate both short-term construction noise and long-term traffic noise. The proposed project would contribute to the cumulative construction noise impacts during the construction phase. However, the proposed project is not located in close proximity to other projects and would not have a considerable incremental contribution to impacts at noise sensitive receptors affected by these projects. The proposed project would not violate the City's Municipal Code with respect to noise. Therefore, the project's contribution to any cumulative noise impacts would not be considerable.

### **5.2.6 Traffic and Circulation**

Each of the projects listed in Section 5.1 would generate new vehicle trips and vehicle miles traveled. The proposed project would not generate any new vehicle trips and would not contribute to cumulative traffic and circulation impacts.

## **6.0 GROWTH INDUCEMENT**

Projects have the potential to foster economic or population growth, which may cause indirect impacts associated with construction of housing and/or community service facilities (see Section 15126.2(d) of the State CEQA Guidelines). A project would have a significant impact if it would induce substantial growth. A project would have the potential to induce substantial growth if it would eliminate or remove an impediment to growth in the area. This includes both physical impediments (lack of roads, flood control facilities, sewers, water lines, etc.) and policy impediments (e.g., existing land use and zoning designations, General Plan policies, etc.).

The proposed project would provide additional parking to serve an existing land use (VCMC) and would not provide any additional housing or long-term employment opportunities. Project-related employment opportunities would be short-term and limited to construction activities, which are anticipated to be met by current Ventura County residents.

The proposed project would not involve expansion of any service infrastructure that could support future development and induce population growth. In addition, the project would not require the amendment of existing land use designations, zoning designations, General Plan policies, ordinances, development guidelines, or any other policies that would allow for increased development of the area.

The proposed project does not include residential units or commercial land uses that may generate substantial employment opportunities; therefore, it would not directly increase population levels, or create a demand for goods or services. Since the proposed project would not affect existing physical and/or policy impediments to growth, it would not induce substantial population growth.



## 7.0 REFERENCES

- Blackburn, Thomas. 1974. Ceremonial Integration and Social Interaction in Aboriginal California. In *Antap: California Indian Political and Economic Organization*, edited by Lowell Bean and Thomas King.
- Blackburn, Thomas. 1975. *December's Child: A Book of Chumash Oral Narratives*. University of California Press, Berkeley.
- California Department of Conservation, Division of Mines and Geology (CDMG). 1993. Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles and Orange Counties, California. Part 1-Ventura County. DMG Open File Report 93-10.
- California Department of Conservation, Division of Mines and Geology. 2003. *Seismic Hazard Zone Report for the Ventura 7.5-minute quadrangle, Ventura County, California*.
- California Emergency Management Agency, California Geologic Survey, University of Southern California. 2009. *Tsunami Inundation Map for Emergency Planning; Ventura Quadrangle*.
- California Natural Diversity Data Base (CNDDB). 2022. Ventura 7.5' quadrangle, RAREFIND5 Output. California Department of Fish and Wildlife. Sacramento, CA.
- Citadel EHS. 2020. *Environmentally Regulated Materials Survey, Colston Center, 375 Hillmont Avenue, Ventura, California 93003*. Prepared for the Ventura County Engineering Services Division.
- City of San Buenaventura. 2021a. *Ventura General Plan Update Water Resources Background Document*.
- City of San Buenaventura. 2021b. *Ventura General Plan Update Cultural & Historic Resources Background Document*.
- City of San Buenaventura. 2005. *2005 Ventura General Plan*.
- Edwards, R.D., D.F. Rabey and R.W. Kover. 1970. Soil Survey of the Ventura Area, California. Prepared for the U.S. Department of Agriculture.
- Federal Highway Administration. 2006. FHWA Roadway Construction Noise Model User's Guide.
- Fox Canyon Groundwater Management Agency. 2007. *Fox Canyon Groundwater Management Plan*.
- Grant, Campbell. 1978. Chumash: Introduction. In *Handbook of North American Indians*, California, Vol. 8. Edited by Robert F. Heizer, Smithsonian Institution, Washington D.C.
- Hudson, Travis, and Ernest Underhay. 1978. *Crystal in the Sky: An Intellectual Odyssey Involving Chumash Astronomy, Cosmology, and Rock Art*. Ballena Press Anthropological Papers No. 10, edited by Lowell J. Bean and Thomas C. Blackburn. Ballena Press, Socorro, New Mexico.

- King, Chester. 1976. Chumash Inter-Village Economic Exchange. In *Native Californians: A Theoretical Retrospective*, edited by Lowell J. Bean and Thomas C. Blackburn. Ballena Press, Socorro, New Mexico.
- King, Chester. 1990. *The Evolution of Chumash Society: A Comparative Study of Artifacts Used in the Social Maintenance of the Santa Barbara Channel Islands Region Before A.D. 1804*. Garland Publishing, Inc., New York. Los Angeles Public Library 2008 Database: Sanborn Maps, City of San Buenaventura.
- King, Chester. 2000. *Native American Indian Cultural Sites in the Santa Monica Mountains*. Prepared for the Santa Monica Mountains and Seashore Foundation Funded Under Cooperative Agreement No. 8540-94-003 with the National Park Service Pacific West Region, Santa Monica Mountains National Recreation Area.
- Los Angeles Regional Water Quality Control Board (LARWQCB). 2014. Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.
- Post/Hazeltine Associates. 2022. *Historic Resources Report Incorporating CEQA Review and Certificate of Appropriateness Review, Frank A. Colston Youth Center*.
- Sawyer, J.O., T. Keeler-Wolf and J.M. Evens. 2009. *A Manual of California Vegetation (Second Edition)*. California Native Plant Society.
- State Water Resources Control Board. 2021. 2018 Integrated Report/303(d) List of Impaired Waterbodies.
- Tan, S., T. Jones and K. Clahan. 2003. *Geologic Map of the Ventura 7.5' Quadrangle, Ventura County, California: A Digital Database*.
- Triem, Judy. 1985. Ventura County, Land of Good Fortune. Windsor Publications, Chatsworth, California.
- Ventura County Air Pollution Control District. 2003. Ventura County Air Quality Assessment Guidelines.
- Ventura County Resource Management Agency. 2011. Ventura County Initial Study Assessment Guidelines.
- Ventura Water. 2021. *2021 Comprehensive Water Resources Report*.
- Xerces Society. 2022. *Western Monarch Thanksgiving Count 1997-2021*.

## **APPENDIX A**

### **INITIAL STUDY CHECKLIST**

---

## INITIAL STUDY CHECKLIST

The Initial Study Checklist was prepared following the format adopted by the County of Ventura (2011).

ISSUE	PROJECT IMPACT DEGREE OF EFFECT *				CUMULATIVE IMPACT DEGREE OF EFFECT *			
	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
RESOURCES: 1. <u>Air Quality:</u>								
a. Regional	—	<u>X</u>	—	—	—	<u>X</u>	—	—
b. Local	—	<u>X</u>	—	—	—	<u>X</u>	—	—
2. <u>Water Resources:</u>								
a. Groundwater Quantity	—	<u>X</u>	—	—	—	<u>X</u>	—	—
b. Groundwater Quality	<u>X</u>	—	—	—	<u>X</u>	—	—	—
c. Surface Water Quantity	—	<u>X</u>	—	—	—	<u>X</u>	—	—
d. Surface Water Quality	—	<u>X</u>	—	—	—	<u>X</u>	—	—
3. <u>Mineral Resources:</u>								
a. Aggregate	—	<u>X</u>	—	—	—	<u>X</u>	—	—
b. Petroleum	<u>X</u>	—	—	—	<u>X</u>	—	—	—
4. <u>Biological Resources:</u>								
a. Endangered, Threatened, or Rare species	<u>X</u>	—	—	—	<u>X</u>	—	—	—
b. Wetland Habitat	<u>X</u>	—	—	—	<u>X</u>	—	—	—
c. Coastal Habitat	<u>X</u>	—	—	—	<u>X</u>	—	—	—
d. Migration corridors	<u>X</u>	—	—	—	<u>X</u>	—	—	—
e. Locally Important Species/Communities	<u>X</u>	—	—	—	<u>X</u>	—	—	—
5. <u>Agricultural Resources:</u>								
a. Soils	<u>X</u>	—	—	—	<u>X</u>	—	—	—
e. Land Use Incompatibility	<u>X</u>	—	—	—	<u>X</u>	—	—	—
6. <u>Scenic Resources:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
7. <u>Paleontological Resources:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
8. <u>Cultural Resources:</u>								
a. Archaeological	—	<u>X</u>	—	—	—	<u>X</u>	—	—
b. Historical	<u>X</u>	—	—	—	<u>X</u>	—	—	—
9. <u>Coastal Beaches &amp; Sand Dunes:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—

ISSUE		PROJECT IMPACT DEGREE OF EFFECT *				CUMULATIVE IMPACT DEGREE OF EFFECT *			
		<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
HAZARDS:	10. <u>Fault Rupture:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	11. <u>Ground-shaking:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	12. <u>Liquefaction:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	13. <u>Seiche &amp; Tsunami:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	14. <u>Landslides/Mudslides:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	15. <u>Expansive Soils:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	16. <u>Subsidence:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	17. <u>Hydraulic Hazards:</u>								
	a. Non-FEMA	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	b. FEMA	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	18. <u>Fire Hazards:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	19. <u>Aviation Hazards:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	20. <u>Hazardous Materials/Waste:</u>								
	a. Hazardous Materials	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Hazardous Waste	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	21. <u>Noise and Vibration:</u>	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	22. <u>Daytime Glare:</u>	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	23. <u>Public Health:</u>	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	24. <u>Greenhouse Gases:</u>	—	<u>X</u>	—	—	—	<u>X</u>	—	—
LAND USE:	25. <u>Community Character:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	26. <u>Housing:</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
PUBLIC FACILITIES:	27. <u>Transportation/Circulation</u>								
	a. Roads and Highways								
	(1) Level of Service	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	(2) Safety/Design of Public Roads	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	(3) Safety/Design of Private Access	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	(4) Tactical Access	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Pedestrian/Bicycle	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	c. Bus Transit	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	d. Railroads	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	e. Airports	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	f. Harbor Facilities	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	g. Pipelines	<u>X</u>	—	—	—	<u>X</u>	—	—	—

ISSUE		PROJECT IMPACT DEGREE OF EFFECT *				CUMULATIVE IMPACT DEGREE OF EFFECT *			
		<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
PUBLIC FACILITIES:	28. <u>Water Supply</u>								
	a. Quality	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Quantity	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	c. Fire Flow	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	29. <u>Waste Treatment/Disposal</u>								
	a. Individual Sewage Disposal System	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Sewage Collection/Treatment Facilities	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	c. Solid Waste Management	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	d. Solid Waste Facilities	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	30. <u>Utilities</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	31. <u>Flood Control/Watercourses</u>								
	a. WPD Facilities/Watercourses	—	<u>X</u>	—	—	—	<u>X</u>	—	—
	b. Other Facilities/Watercourses	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	32. <u>Law Enforcement/Emergency Svs.</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	33. <u>Fire Protection</u>								
	a. Distance/Response Time	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Personnel/Equipment/Facilities	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	34. <u>Education</u>								
	a. Schools	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	b. Libraries	<u>X</u>	—	—	—	<u>X</u>	—	—	—
	35. <u>Recreation</u>	<u>X</u>	—	—	—	<u>X</u>	—	—	—

\*Explanation: Degree of Effect

N = No Effect

LS = Less Than Significant Effect

PS-M = Potentially Significant Impact Unless Mitigation is Incorporated

PS = Potentially Significant Impact



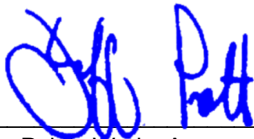
## MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes/Maybe</u>	<u>No</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<u>X</u>	—
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).	—	<u>X</u>
3. Does the project have impacts which 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 effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).	—	<u>X</u>
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<u>X</u>	—

## DETERMINATION OF ENVIRONMENTAL DOCUMENT

### On the basis of this evaluation:

- [ X ] I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
- [ ] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Section 5.0 of the Initial Study will be applied to the project. A MITIGATED NEGATIVE DECLARATION should be prepared.
- [ ] I find that the proposed project, individually or cumulatively, MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required\*.
- [ ] I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been adequately addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- [ ] I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Ventura County Public Works Agency Director

CEC 1/17/23

1/17/23

Date

## **APPENDIX B**

### **PUBLIC COMMENTS AND RESPONSES**

**APPENDIX B**  
**COMMENTS RECEIVED ON THE DRAFT**  
**NEGATIVE DECLARATION**

<u>Party</u>	<u>Date</u>
1. Cherie Egbert	January 19, 2023
2. Cherie Egbert	February 8, 2023
3. Cherie Egbert	February 21, 2023
4. Christy Weir	January 20, 2023
5. Monica Gear	January 25, 2023
6. Monica Gear	February 9, 2023
7. Natalie Bruton	January 20, 2023
8. Natalie Bruton	February 14, 2023
9. Brian Gear	January 30, 2023
10. Robert Garven, Jr.	February 17, 2023
11. California Department of Transportation	February 10, 2023
12. Ventura County Air Pollution Control District	February 14, 2023

**From:** [Cherie Egbert](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)  
**Subject:** Parking  
**Date:** Thursday, January 19, 2023 11:07:04 PM  
**Attachments:** [Screen Shot 2023-01-19 at 9.43.49 PM.png](#)

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Subject: Parking Lot Improvement Project Plan at 375 Hillmont Drive

Hello, Ms Nallamial,

Thank you for sending a Public Works notice to your neighbors. Having more parking will be welcomed in our area.

I am interested in local city (local county) projects and have a keen interest in designing for healthy communities, which takes into account environmental design factors. I went to the website to see the hardscape/ landscape plan and all that is available is a drawing which imposes the parking spaces on a google maps bird's eye view. I would be interested in seeing the plan document.

I have 4 initial questions:

1. Will they be planting any trees in this parking lot, amongst the car parking spaces, or along the pedestrian sidewalk? It looks like several mature trees needed to be removed and I am wondering if they will be replaced.
2. I was informed 2700 Kelvin is LED color temperature that Cal Trans uses on the highway and for our local few led streetlights and I am wondering if your color temperature of your parking lot lights will be the same warm temperture lighting?
3. I noticed you are planning on installing 28' tall light fixture's for your parking lot. On the Cal Trans site, and general city parking lot recommendations I noticed parking lot light height recommendation is typically 12-15 feet tall especially if it is near homes, and I am wondering if you would consider this option since residential homes on Estrella back this lot?
3. Lastly, Will the LED lights be recessed into the fixtures to shield the light and reduce glare and light trespass in accordance with best practices for neighborhood compatibility?

Thanks for your time. And I look forward to hearing from you.

Please reply to  
Cherie Egbert  
[Cherie.egbert@gmail.com](mailto:Cherie.egbert@gmail.com)

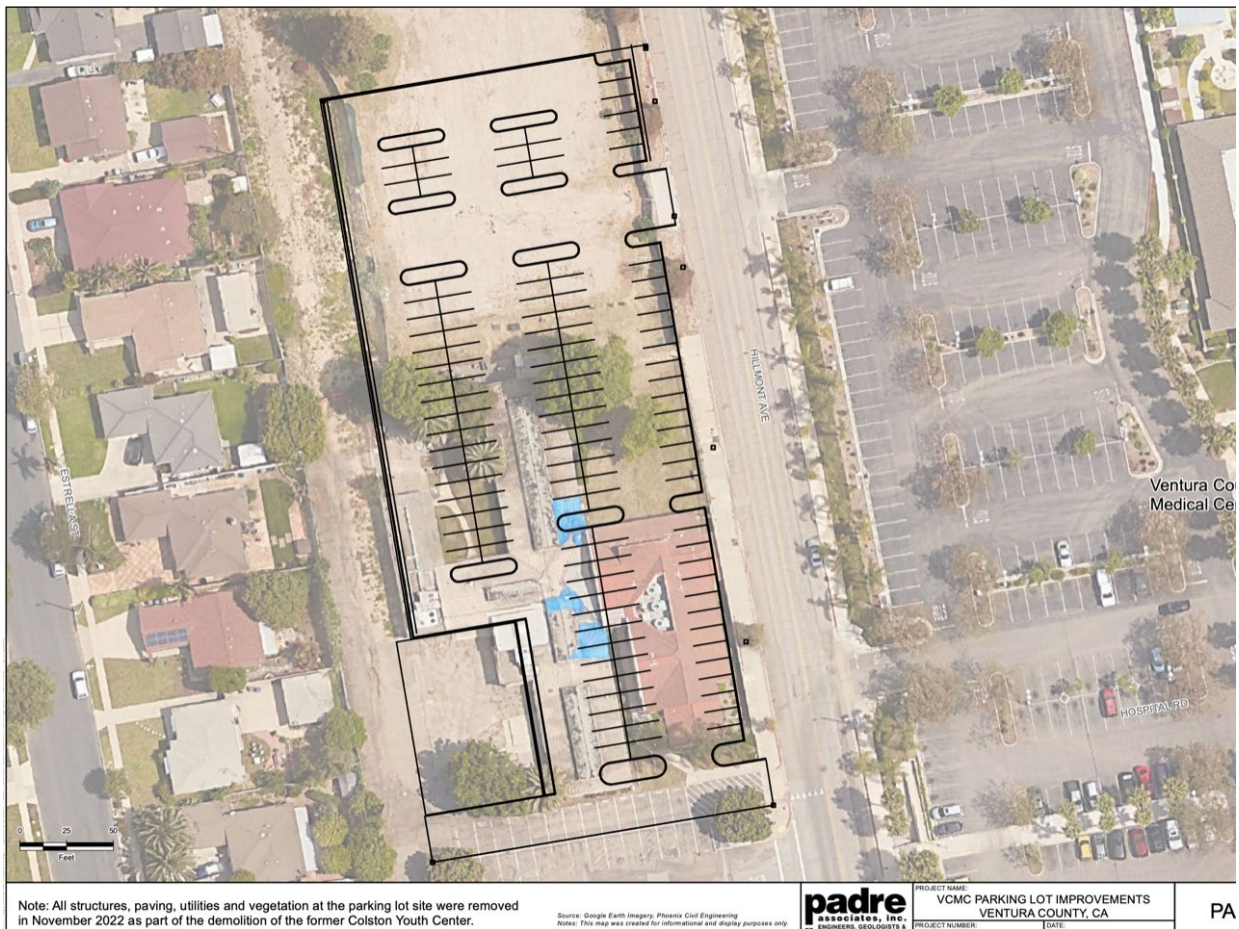
Links and info on your project copied here.

<https://www.vcpublishworks.org/es/projects/vcmcparkinglotimprovements/>

## **Project Details:**

The approximately 1.7 acre parking lot would be composed of asphalt concrete and include 139 standard parking spaces (9 by 18-foot, two bi-directional access driveways from Hillmont Avenue, ten LED light fixtures mounted on 28-foot-tall light standards, focused downwards to provide security lighting, irrigated landscaping along Hillmont Avenue (approximately 10 feet wide, or about 3,600 square feet), a 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bio-swale, screening landscaping immediately east of the storm water treatment area (approximately six feet wide, or about 570 square feet) and fencing along the perimeter of the storm water treatment area.

## **How to Comment:**



The Ventura County Public Works Agency is soliciting comments on the adequacy and completeness of the ND. Comments should be provided to the Project Manager, Ms. Devi Nallamala at 800 S. Victoria Avenue, Ventura, California 93009 or [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) prior to the close of the public comment period on February 21, 2023, at 5:00 p.m. The date and time of the Board of Supervisors hearing to consider project approval will be provided on the Public Works Agency website.

**Commenter:** Cherie Egbert

**Date:** January 19, 2023

**Response:**

1. The proposed project consists of the new parking lot. Demolition of the former Colston Youth Center and associated tree removal was conducted as a separate project. Trees will be planted in parking islands throughout the parking lot.
2. The proposed light fixtures will be very similar to existing parking lot lighting across Hillmont Avenue at VCMC, dark-sky compliant LED fixtures. The proposed light fixtures (Rayon T391LED, or equivalent) would have a 4,000 °K color temperature.
3. The proposed light standard height is needed to meet public safety illumination requirements. The photometric study prepared for the proposed project indicates the proposed lighting would produce only 0.2 foot-candles at the western parking lot boundary and expected to be much lower at the nearest residence (approximately 85 feet away).
4. The proposed lighting fixtures would be focused on the ground, with no light emitted upward (dark-sky compliant), which minimizes light spill-over onto adjacent land uses.

**From:** [Cherie Egbert](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [Christy Weir](#); [Barbara Brown Brown](#); [cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)  
**Subject:** Fwd: Parking Hillmont  
**Date:** Wednesday, February 8, 2023 10:21:11 AM  
**Attachments:** [Screen Shot 2023-01-19 at 9.43.49 PM.png](#)

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Hello Ms. Nallamial,  
I haven't heard back from anyone, so I am following up. Please see my original email with the four questions below.

I copied Ventura Tree Alliance, as I know that they are such a strong advocate for trees in parking lots, and when I was at the county meeting when they received a county award for planting trees, I specifically remember the county supervisors mentioning that they are going to promote trees in their parking lots. Yay! This parking lot will be a great opportunity to showcase good environmental design which can foster wellbeing by creating a soothing, calm environment.

I think it's important that the pole lights are below the tree canopy not above, and they will be more effective. So a 12 to 15 foot height would help facilitate this. If you examine the Hillmont parking lot across the street in the evening, because the post lights are so tall, you'll notice that when the posts are near trees, they have to pierce through the tree canopy.

If I may throw out a suggestion: The Cottage Hospital in Santa Barbara, has some excellent examples of lights and trees as it was recently remodeled. Thousand Oaks also has good examples at their health facilities.

I look forward to hearing back from you.

If this item is going to be on the agenda at a future county meeting, please let me know. I would love to attend and advocate for the trees and warm directional lighting.

Warmly,  
Cherie

Cherie Egbert Interior Design  
805-901-0090  
[Cherie.Egbert@gmail.com](mailto:Cherie.Egbert@gmail.com)

"creating environments to enhance joy"

Sent from my i phone

Begin forwarded message:

**From:** Cherie Egbert <[cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)>  
**Date:** January 19, 2023 at 11:05:27 PM PST



**To:** devi.nallamala@ventura.org  
**Cc:** Cherie Egbert <cherie.egbert@gmail.com>  
**Subject: Parking**

Subject: Parking Lot Improvement Project Plan at 375 Hillmont Drive

Hello, Ms Nallamial,  
Thank you for sending a Public Works notice to your neighbors. Having more parking will be welcomed in our area.

I am interested in local city (local county) projects and have a keen interest in designing for healthy communities, which takes into account environmental design factors. I went to the website to see the hardscape/ landscape plan and all that is available is a drawing which imposes the parking spaces on a google maps bird's eye view. I would be interested in seeing the plan document.

I have 4 initial questions:

1. Will they be planting any trees in this parking lot, amongst the car parking spaces, or along the pedestrian sidewalk? It looks like several mature trees needed to be removed and I am wondering if they will be replaced.
2. I was informed 2700 Kelvin is LED color temperature that Cal Trans uses on the highway and for our local few led streetlights and I am wondering if your color temperature of your parking lot lights will be the same warm temperature lighting?
3. I noticed you are planning on installing 28' tall light fixture's for your parking lot. On the Cal Trans site, and general city parking lot recommendations I noticed parking lot light height recommendation is typically 12-15 feet tall especially if it is near homes, and I am wondering if you would consider this option since residential homes on Estrella back this lot?
3. Lastly, Will the LED lights be recessed into the fixtures to shield the light and reduce glare and light trespass in accordance with best practices for neighborhood compatibility?

Thanks for your time. And I look forward to hearing from you.

Please reply to  
Cherie Egbert  
[Cherie.egbert@gmail.com](mailto:Cherie.egbert@gmail.com)

Links and info on your project copied here.

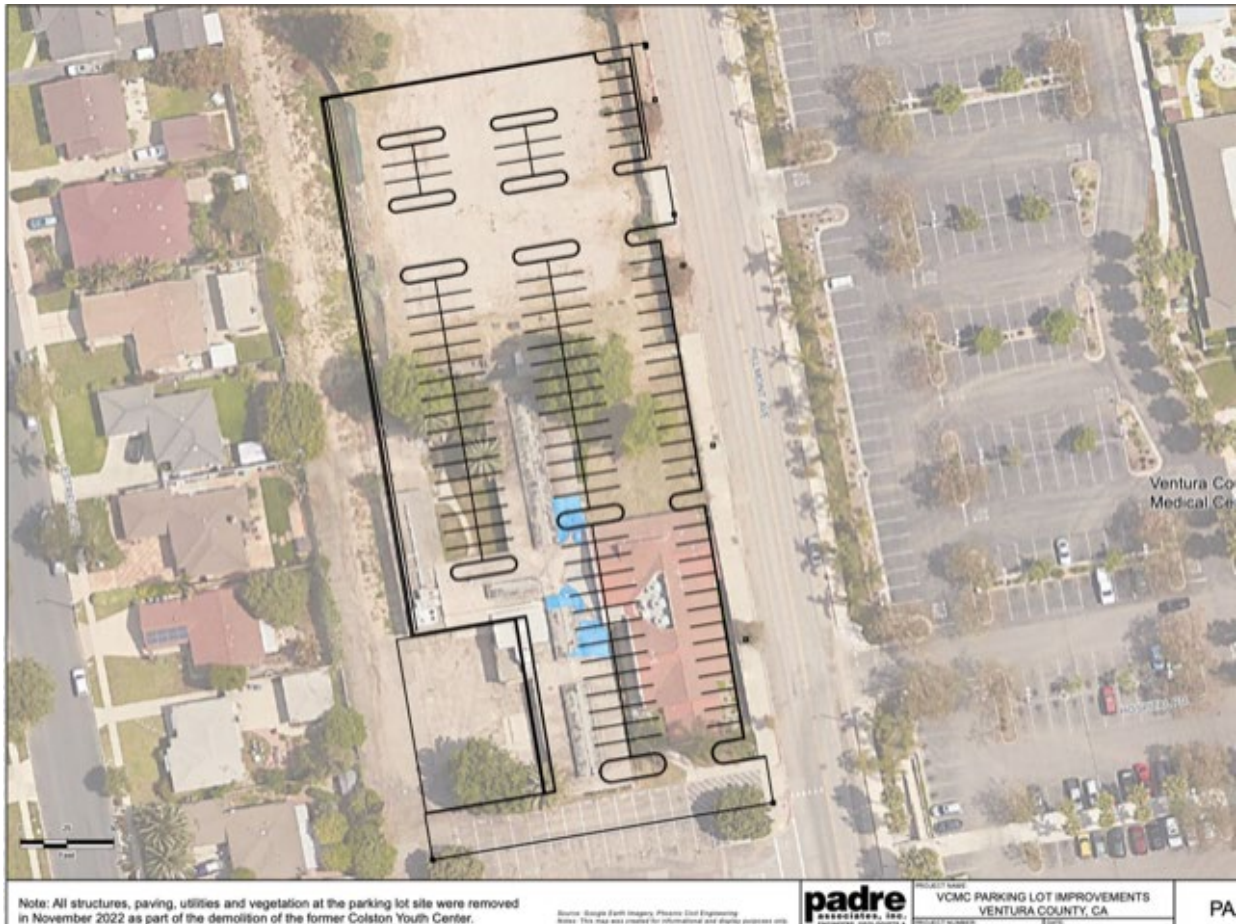
<https://www.vcpublishworks.org/es/projects/vcmcparkinglotimprovements/>

[https://s29422.pcdn.co/wp-content/uploads/2023/01/VCMC-parking-lot\\_Public-Draft\\_ND\\_IS.pdf](https://s29422.pcdn.co/wp-content/uploads/2023/01/VCMC-parking-lot_Public-Draft_ND_IS.pdf)

**Project Details:**

The approximately 1.7 acre parking lot would be composed of asphalt concrete and include 139 standard parking spaces (9 by 18-foot, two bi-directional access driveways from Hillmont Avenue, ten LED light fixtures mounted on 28-foot-tall light standards, focused downwards to provide security lighting, irrigated landscaping along Hillmont Avenue (approximately 10 feet wide, or about 3,600 square feet), a 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bio-swale, screening landscaping immediately east of the storm water treatment area (approximately six feet wide, or about 570 square feet) and fencing along the perimeter of the storm water treatment area.

### **How to Comment:**



The Ventura County Public Works Agency is soliciting comments on the adequacy and completeness of the ND. Comments should be

provided to the Project Manager, Ms. Devi Nallamala at 800 S. Victoria Avenue, Ventura, California 93009 or [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) prior to the close of the public comment period on February 21, 2023, at 5:00 p.m. The date and time of the Board of Supervisors hearing to consider project approval will be provided on the Public Works Agency website.

**Commenter:** Cherie Egbert

**Date:** February 8, 2023

**Response:**

See the response to your January 19, 2023 email. A 12 to 15-foot light standard height would require many more light fixtures which would substantially reduce the number of parking spaces. The photometric study indicates encroachment of parking lot lighting onto adjacent residential properties would be minimal. It is anticipated that trees planted in parking islands would not substantially affect parking lot illumination due to the light standard spacing.

**From:** [Cherie Egbert](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [Christy Weir](#); [Barbara Brown Brown](#)  
**Subject:** Re: Parking Hillmont  
**Date:** Tuesday, February 21, 2023 12:24:37 PM

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Dear Ms Nallamala,

Today is the deadline. I still haven't heard back from you regarding the public comment process.

Will the emails that I sent to you with my questions be turned into a public comment or is there another email that I should be sending it to? Please reply and advise.

Thanks

Cherie

Cherie Egbert Interior Design  
805-901-0090  
[Cherie.Egbert@gmail.com](mailto:Cherie.Egbert@gmail.com)

"creating environments to enhance joy"

Sent from my i phone

On Feb 12, 2023, at 2:12 PM, Cherie Egbert <[cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)> wrote:

Hi Devi,

Thank you for responding. Please look at my original email in the thread.

Before I make a public comment. I am wondering if you're able to answer the four questions I have in the original email. This way I can make more educated and pertinent public comment. Please advise.

When we submit a public comment, do we submit it to you, or to the county board of supervisors?

Thanks Again  
Cherie

Cherie Egbert Interior Design  
805-901-0090  
[Cherie.Egbert@gmail.com](mailto:Cherie.Egbert@gmail.com)

"creating environments to enhance joy"

Sent from my i phone

On Feb 9, 2023, at 1:45 PM, Nallamala, Devi <Devi.Nallamala@ventura.org> wrote:

Good Afternoon,

Thank you for your participation and review, all the comments submitted during the public comment period will be reviewed and evaluated at the end of the comment period (I.e. February 21, 2023). I appreciate your patience.

Thank you,  
Devi

---

**From:** Cherie Egbert <cherie.egbert@gmail.com>  
**Sent:** Wednesday, February 8, 2023 10:20 AM  
**To:** Nallamala, Devi <Devi.Nallamala@ventura.org>  
**Cc:** Christy Weir <christy@christyweir.com>; Barbara Brown Brown <barbarabrownventura@gmail.com>; cherie.egbert@gmail.com  
**Subject:** Fwd: Parking Hillmont

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Hello Ms. Nallamial,  
I haven't heard back from anyone, so I am following up. Please see my original email with the four questions below.

I copied Ventura Tree Alliance, as I know that they are such a strong advocate for trees in parking lots, and when I was at the county meeting when they received a county award for planting trees, I specifically remember the county supervisors mentioning that they are going to promote trees in their parking lots. Yay! This parking lot will be a great opportunity to showcase good environmental design which can foster wellbeing by creating a soothing, calm environment.

I think it's important that the pole lights are below the tree canopy not above, and they will be more effective. So a 12 to 15 foot height would help facilitate this. If you examine the Hillmont parking lot across the street in the evening, because the post lights are so tall, you'll notice that when the posts are near trees, they have to pierce through the tree canopy.

If I may throw out a suggestion : The Cottage Hospital in Santa Barbara, has some excellent

examples of lights and trees as it was recently remodeled. Thousand Oaks also has good examples at their health facilities.

I look forward to hearing back from you.

If this item is going to be on the agenda at a future county meeting, please let me know. I would love to attend and advocate for the trees and warm directional lighting.

Warmly,  
Cherie

Cherie Egbert Interior Design  
805-901-0090  
[Cherie.Egbert@gmail.com](mailto:Cherie.Egbert@gmail.com)

"creating environments to enhance joy"

Sent from my i phone

Begin forwarded message:

**From:** Cherie Egbert <[cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)>  
**Date:** January 19, 2023 at 11:05:27 PM PST  
**To:** [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)  
**Cc:** Cherie Egbert <[cherie.egbert@gmail.com](mailto:cherie.egbert@gmail.com)>  
**Subject: Parking**

Subject: Parking Lot Improvement Project Plan at 375 Hillmont Drive

Hello, Ms Nallamial,  
Thank you for sending a Public Works notice to your neighbors. Having more parking will be welcomed in our area.

I am interested in local city (local county) projects and have a keen interest in designing for healthy communities, which takes into account environmental design factors. I went to the website to see the hardscape/ landscape plan and all that is available is a drawing which imposes the parking spaces on a google maps bird's eye view. I would be interested in seeing the plan document.

I have 4 initial questions:

1. Will they be planting any trees in this parking lot, amongst the car parking spaces, or along the pedestrian sidewalk? It looks like several mature trees needed to be removed and I am wondering if

they will be replaced.

2. I was informed 2700 Kelvin is LED color temperature that Cal Trans uses on the highway and for our local few led streetlights and I am wondering if your color temperature of your parking lot lights will be the same warm temperature lighting?

3. I noticed you are planning on installing 28' tall light fixture's for your parking lot. On the Cal Trans site, and general city parking lot recommendations I noticed parking lot light height recommendation is typically 12-15 feet tall especially if it is near homes, and I am wondering if you would consider this option since residential homes on Estrella back this lot?

3. Lastly, Will the LED lights be recessed into the fixtures to shield the light and reduce glare and light trespass in accordance with best practices for neighborhood compatibility?

Thanks for your time. And I look forward to hearing from you.

Please reply to  
Cherie Egbert  
[Cherie.egbert@gmail.com](mailto:Cherie.egbert@gmail.com)

Links and info on your project copied here.

<https://www.vcpublishworks.org/es/projects/vcmcparkinglotimprovements/>

[https://s29422.pcdn.co/wp-content/uploads/2023/01/VCMC-parking-lot\\_Public-Draft\\_ND\\_IS.pdf](https://s29422.pcdn.co/wp-content/uploads/2023/01/VCMC-parking-lot_Public-Draft_ND_IS.pdf)

## **Project Details:**

The approximately 1.7 acre parking lot would be composed of asphalt concrete and include 139 standard parking spaces (9 by 18-foot, two bi-directional access driveways from Hillmont Avenue, **ten LED light fixtures mounted on 28-foot-tall light standards, focused downwards to provide security lighting, irrigated landscaping along Hillmont Avenue** (approximately 10 feet wide, or about 3,600 square feet), a 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bio-swale, **screening landscaping** immediately east of the storm water treatment area (approximately six feet wide, or about 570 square feet) and



fencing along the perimeter of the storm water treatment area.

**How to Comment:**

<image001.png>

The Ventura County Public Works Agency is soliciting comments on the adequacy and completeness of the ND. Comments should be provided to the Project Manager, Ms. Devi Nallamala at 800 S. Victoria Avenue, Ventura, California 93009 or [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) prior to the close of the public comment period on February 21, 2023, at 5:00 p.m. The date and time of the Board of Supervisors hearing to consider project approval will be provided on the Public Works Agency website.

**Commenter:** Cherie Egbert

**Date:** February 21, 2023

**Response:**

See the responses to your January 19 and February 8, 2023 emails.

**From:** [Christy Weir](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [LaVere, Matt](#)  
**Subject:** Hillmont Parking Lot  
**Date:** Friday, January 20, 2023 8:35:31 AM

---

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Ms Nallamala,  
Good morning!

We were disappointed to see mature trees destroyed for the new Hillmont parking lot construction. Please ensure that replacement canopy trees are planted, for shade and storm water capture and habitat. It's more important than ever that asphalt lots include sufficient trees and tree wells and other landscaped areas to prevent runoff. The landscape plan we read did not specify number and species of trees. Many jurisdictions now require one tree for every 4-6 parking spaces.

The parking lot across Hillmont behind the medical building is an example of a well-landscaped lot with a healthy tree canopy.

Also, please ensure that new lighting is on lower poles, is a warm/low LED level, and shielded to illuminate the lot without light spillage. The adjacent neighborhood will be appreciative of those considerations, as will animals and plants.

The county parking lot adjacent to Foothill, east of Hillmont has extremely bright and non-shielded lighting which is dangerous to drivers at night and impacts neighbors and wildlife.

Thank you for your consideration.  
Sincerely,  
Christy Weir  
President, Ventura Tree Alliance

Sent from my iPad

**Commenter:** Christy Weir

**Date:** January 20, 2023

**Response:**

Trees would be planted in parking islands throughout the parking lot. The project includes stormwater detention and treatment to minimize offsite water quality and peak flow impacts. The proposed light fixtures will be very similar to existing parking lot lighting across Hillmont Avenue at VCMC, dark-sky compliant LED fixtures. The proposed light fixtures (Rayon T391LED, or equivalent) would have a 4,000 °K color temperature.

The proposed light standard height is needed to meet public safety illumination requirements. The photometric study prepared for the proposed project indicates the proposed lighting would produce only 0.2 foot-candles at the western parking lot boundary and expected to be much lower at the nearest residence (approximately 85 feet away).

The proposed lighting fixtures would be focused on the ground, with no light emitted upward (dark-sky compliant), which minimizes light spill-over onto adjacent land uses.

**From:** [Monica Gear](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [Brian Gear](#); [Robert Garven](#); [Paul Klein](#); [Shirley And Chris Hacklman](#); [JOHN CARR](#)  
**Subject:** VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization  
**Date:** Wednesday, January 25, 2023 11:47:28 AM  
**Attachments:** [VCMC Parking Lot - Residents Request \(01.25.23\).pdf](#)

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Greetings Devi, (et al),

Please review attachment that includes the following:

- a. Plan View outlining proposed additional screening landscaping by planting row of tall dense foliage trees by the County.
- b. images of newly occurring light pollution being experienced (from all the way across Hillmont) into our backyards and before image of backyard vista over the Colston Bldg.

The residents of Estrella Street have been impacted in many ways from the VCMC Parking Lot Improvement Project and Colston Bldg. Demo.

1. enduring sustained extreme loud noise and earth shaking daily, for months during demo
2. being exposed to extreme dust and airborne hazardous particulates during demo
3. dramatic loss of natural vista as mature Liquid Amber Trees and Canary Island Palms which housed raptors and migrating birds were destroyed
4. now that the trees are gone, there is new exposure to light pollution from the existing parking lot on the other side of Hillmont.
5. loss of property value (Homes are demonstrated to be less sellable and sell for lower prices when adjacent areas become industrialized.)

The 10 new 28' tall LED light standards creates grave concern.

In attempt to preserve our current property values and our right to a peaceful, suburban residential experience, that we have invested in upon purchasing our homes and have enjoyed for decades, we want to request that the County create an addendum to plan to include additional screening landscaping by planting a row of tall dense foliage trees as outlined in attached drawing. This action would help mitigate much concern and demonstrate to the community that the County can be a good neighbor.

Please recognize that we as residents, do not have the ability to plant large trees on our properties considering that we bear the burden of the Utility Easement on our East Property Lines.

Large trees on our property would interfere with the public utility power pole lines.

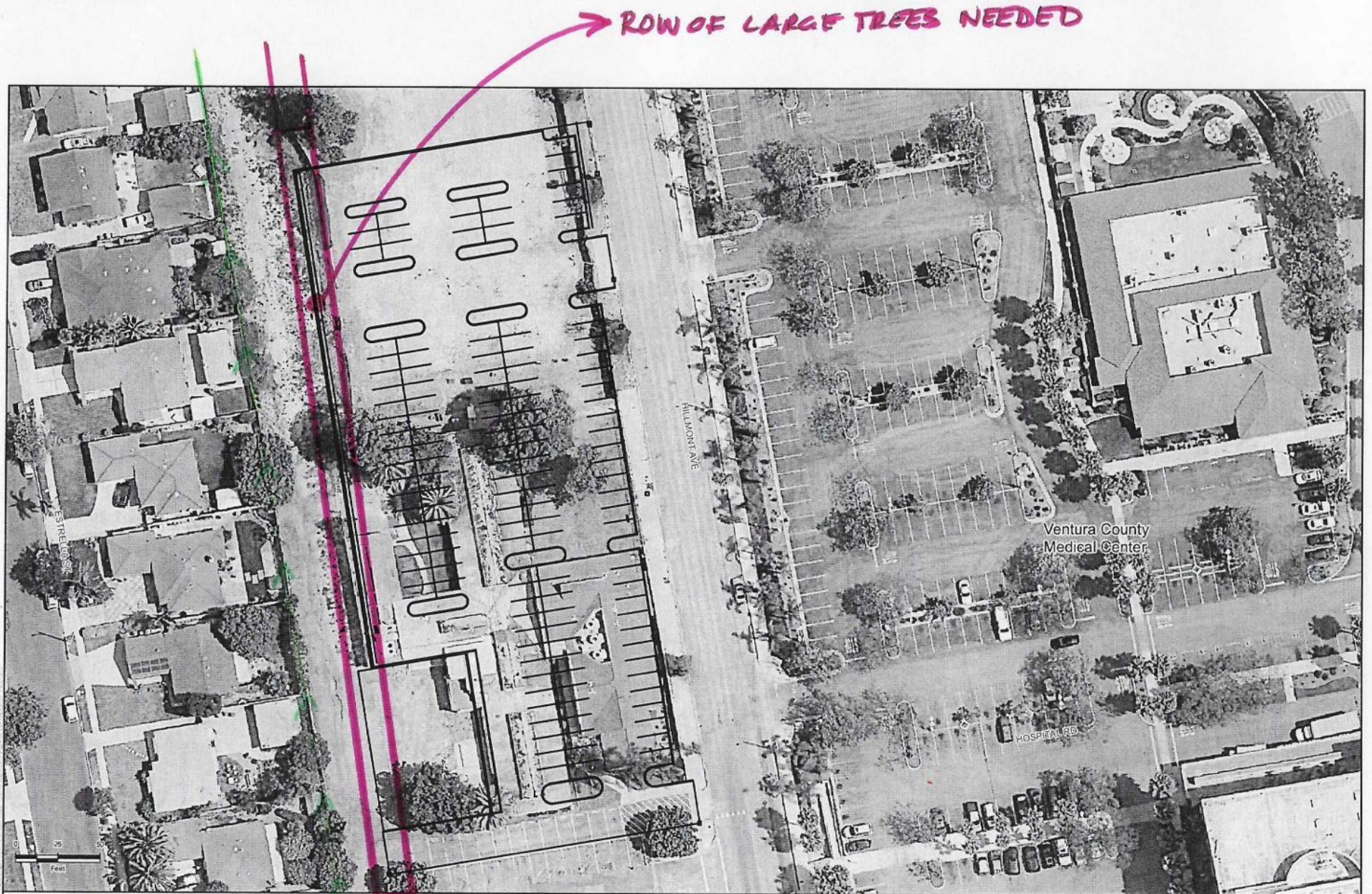
Please let us know the best way to have our concerned addressed by the County.

Respectfully,  
Monica Gear

*From the personal desk of...*

**MONICA GEAR**  
**332 Estrella Street**  
**Ventura CA 93003**





Note: All structures, paving, utilities and vegetation at the parking lot site were removed in November 2022 as part of the demolition of the former Colston Youth Center.

Source: Google Earth Imagery, Phoenix Civil Engineering  
Notes: This map was created for informational and display purposes only.

**padre**  
associates, inc.  
ENGINEERS, GEOLOGISTS &  
ENVIRONMENTAL SCIENTISTS

PROJECT NAME  
VCMC PARKING LOT IMPROVEMENTS  
VENTURA COUNTY, CA  
PROJECT NUMBER  
2102-4961  
DATE  
December 2022

PARKING LOT PLAN

FIGURE  
3

UTILITY EASEMENT

ROW OF LARGE TREES NEEDED











**Commenter:** Monica Gear

**Date:** January 25, 2023

**Response:**

The proposed project consists of the new parking lot. Demolition of the former Colston Youth Center and associated dust, noise and tree removal was conducted as a separate project. The proposed parking lot is not an industrial land use. Due to existing fencing and landscaping, the proposed parking lot would not be visible to adjacent residents (excluding the light fixtures). The photometric study prepared for the proposed project indicates the proposed lighting would produce only 0.2 foot-candles at the western parking lot boundary and expected to be much lower at the nearest residence (approximately 85 feet away). Therefore, landscape screening is not needed to address impacts. However, as a courtesy, Ventura County plans to plant trees along the western property boundary to improve the existing landscape buffer.

**From:** [Monica Gear](#)  
**To:** [Nallamala, Devi](#)  
**Subject:** Re: VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization  
**Date:** Thursday, February 9, 2023 9:42:41 AM  
**Attachments:** [VCMC Parking Lot - Residents Request \(01.25.23\).pdf](#)

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Greeting Devi and All,

Please provide confirmation that you are in receipt of my email below dated January 25, 2023 at 11:45am.

We have not received any form of acknowledgement that our concerns are being addressed or even heard.

If there is is another contact that we should be communicating through please provide.

Your immediate attention would be greatly appreciated.  
Respectfully, Monica Gear

*From the personal desk of...*  
**MONICA GEAR (805)746-9598**

On Jan 30, 2023, at 9:13 AM, BRIAN GEAR  
<[gearski@hotmail.com](mailto:gearski@hotmail.com)> wrote:

Devi,

Including Matt, our elected official that represents Ventura, for his visibility of our concerns and request to plant trees to mitigate eyesore, noise and light pollution. Please see email from my wife Monica below. We look forward to hearing back from you on this very sensitive matter.

Brian Gear  
Ventura, Ca

---

**From:** Monica Gear <[venturagear@hotmail.com](mailto:venturagear@hotmail.com)>  
**Sent:** Wednesday, January 25, 2023 11:45 AM  
**To:** [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) <[devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)>

**Cc:** Brian Gear <gearski@hotmail.com>; Robert Garven <rgarven@gmail.com>; Paul Klein <pklein7531@aol.com>; Shirley And Chris Hacklman <timetogarden@hotmail.com>; JOHN CARR <jcarrgp@gmail.com>

**Subject:** VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization

Greetings Devi, (et al),

Please review attachment that includes the following:

- a. Plan View outlining proposed additional screening landscaping by planting row of tall dense foliage trees by the County.
- b. images of newly occurring light pollution being experienced (from all the way across Hillmont) into our backyards and before image of backyard vista over the Colston Bldg.

The residents of Estrella Street have been impacted in many ways from the VCMC Parking Lot Improvement Project and Colston Bldg. Demo.

1. enduring sustained extreme loud noise and earth shaking daily, for months during demo
2. being exposed to extreme dust and airborne hazardous particulates during demo
3. dramatic loss of natural vista as mature Liquid Amber Trees and Canary Island Palms which housed raptors and migrating birds were destroyed
4. now that the trees are gone, there is new exposure to light pollution from the existing parking lot on the other side of Hillmont.
5. loss of property value (Homes are demonstrated to be less sellable and sell for lower prices when adjacent areas become industrialized.)

The 10 new 28' tall LED light standards creates grave concern.

In attempt to preserve our current property values and our right to a peaceful, suburban residential experience, that we have invested in upon purchasing our homes and have enjoyed for decades, we want to request that the County create an addendum to plan to include additional screening landscaping by planting a row of tall dense foliage trees as outlined in attached drawing. This action would help mitigate much concern and demonstrate to the community that the County can be a good neighbor.

Please recognize that we as residents, do not have the ability to plant large trees on our properties considering that we bear the burden of the Utility Easement on our East Property Lines.

Large trees on our property would interfere with the public utility power pole lines.

Please let us know the best way to have our concerns addressed by the County.

Respectfully,  
Monica Gear

*From the personal desk of...*

**MONICA GEAR**  
**332 Estrella Street**  
**Ventura CA 93003**

**Commenter:** Monica Gear

**Date:** February 9, 2023

**Response:**

See responses to your January 25, 2023 email.

**From:** [Natalie Bruton](#)  
**To:** [Nallamala, Devi](#)  
**Subject:** VCMC Parking Lot  
**Date:** Friday, January 20, 2023 10:05:46 AM

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Hello Ms. Nallamala,

I recently received a letter regarding parking lot improvements for VCMC. I know parking is definitely an issue so this is an important project.

Just have a couple of questions which I hope you can assist.

Question #1:

The is an area above this new parking lot which borders Foothill, are there any plans for this hillside vacant zone?

Question #2:

What are the plans for the top parking area which is currently in use and accessed from Foothill?

Question #3:

Will there be a crosswalk with lights similar to that located closer to the hospital entrance further down on Hillmont? I think this might be on the plans and will take a look. It is important as many people will be crossing and coming down the hill cars tend to speed.

I appreciate your assistance and have a great day.

Be Well,  
Natalie J. Bruton

**Commenter:** Natalie Bruton

**Date:** January 20, 2023

**Response:**

The County is unaware of any plans for the area north of the proposed parking lot. The existing VCMC parking lot at the southeast corner of Foothill Road and Hospital Road will remain in operation. The project does not include a crosswalk. A crosswalk with flashing beacons is located just south of the project site.



**From:** [Natalie Bruton](#)  
**To:** [Nallamala, Devi](#)  
**Subject:** Re: VCMC Parking Lot  
**Date:** Tuesday, February 14, 2023 12:22:24 PM  
**Importance:** High

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Hello Ms. Nallamala,

Please see below for my questions regarding the upcoming VCMC parking lot upgrade.

I have answered one on my own – there is currently a crosswalk with lights in that general area.

Look forward to having Question #1 and #2 answered or provide me with direction as to where to find the answers.

Thank you,  
Natalie J. Bruton

---

**From:** Natalie Bruton <[ericbruton@sbcglobal.net](mailto:ericbruton@sbcglobal.net)>  
**Date:** Friday, January 20, 2023 at 10:05 AM  
**To:** <[devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)>  
**Subject:** VCMC Parking Lot

Hello Ms. Nallamala,

I recently received a letter regarding parking lot improvements for VCMC. I know parking is definitely an issue so this is an important project.

Just have a couple of questions which I hope you can assist.

Question #1:

The is an area above this new parking lot which borders Foothill, are there any plans for this hillside vacant zone?

Question #2:

What are the plans for the top parking area which is currently in use and accessed from Foothill?

Question #3:

Will there be a crosswalk with lights similar to that located closer to the hospital entrance further down on Hillmont? I think this might be on the plans and will take a look. It is important as many people will be crossing and coming down

the hill cars tend to speed.

I appreciate your assistance and have a great day.

Be Well,  
Natalie J. Bruton

**Commenter:** Natalie Bruton

**Date:** February 14, 2023

**Response:**

See responses to your January 20, 2023 email.

**From:** [BRIAN GEAR](#)  
**To:** [Nallamala, Devi](#)  
**Cc:** [LaVere, Matt](#); [Monica Gear](#); [McGraw, Ian](#); [Zenner, Diana](#); [Carroll, Matt](#); [Robert Garven](#); [timetogarden@hotmail.com](#)  
**Subject:** Re: VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization  
**Date:** Monday, January 30, 2023 9:48:29 PM

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Devi,

Including Matt, our elected official that represents Ventura, for his visibility of our concerns and request to plant trees to mitigate eyesore, noise and light pollution. Please see email from my wife Monica below. We look forward to hearing back from you on this very sensitive matter.

Get [Outlook for iOS](#)

---

**From:** BRIAN GEAR <[gearski@hotmail.com](mailto:gearski@hotmail.com)>  
**Sent:** Monday, January 30, 2023 9:13:32 AM  
**To:** [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) <[devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)>  
**Cc:** [LaVere, Matt <Matt.LaVere@ventura.org>](mailto:LaVere, Matt <Matt.LaVere@ventura.org>); [Monica Gear <venturagear@hotmail.com>](mailto:Monica Gear <venturagear@hotmail.com>); [McGraw, Ian <Ian.McGraw@ventura.org>](mailto:McGraw, Ian <Ian.McGraw@ventura.org>); [Zenner, Diana <Diana.Zenner@ventura.org>](mailto:Zenner, Diana <Diana.Zenner@ventura.org>); [Carroll, Matt <matt.carroll@ventura.org>](mailto:Carroll, Matt <matt.carroll@ventura.org>); [Robert Garven <robertgarven@earthlink.net>](mailto:Robert Garven <robertgarven@earthlink.net>); [timetogarden@hotmail.com <timetogarden@hotmail.com>](mailto:timetogarden@hotmail.com <timetogarden@hotmail.com>)  
**Subject:** Fw: VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization

Devi,

Including Matt, our elected official that represents Ventura, for his visibility of our concerns and request to plant trees to mitigate eyesore, noise and light pollution. Please see email from my wife Monica below. We look forward to hearing back from you on this very sensitive matter.

Brian Gear  
Ventura, Ca

---

**From:** Monica Gear <[venturagear@hotmail.com](mailto:venturagear@hotmail.com)>  
**Sent:** Wednesday, January 25, 2023 11:45 AM  
**To:** [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) <[devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)>  
**Cc:** [Brian Gear <gearski@hotmail.com>](mailto:Brian Gear <gearski@hotmail.com>); [Robert Garven <rgarven@gmail.com>](mailto:Robert Garven <rgarven@gmail.com>); [Paul Klein <pklein7531@aol.com>](mailto:Paul Klein <pklein7531@aol.com>); [Shirley And Chris Hacklman <timetogarden@hotmail.com>](mailto:Shirley And Chris Hacklman <timetogarden@hotmail.com>); [JOHN CARR <jcarrgp@gmail.com>](mailto:JOHN CARR <jcarrgp@gmail.com>)  
**Subject:** VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization

Greetings Devi, (et al),

Please review attachment that includes the following:

- a. Plan View outlining proposed additional screening landscaping by planting row of tall dense foliage trees by the County.
- b. images of newly occurring light pollution being experienced (from all the way across Hillmont) into our backyards and before image of backyard vista over the Colston Bldg.

The residents of Estrella Street have been impacted in many ways from the VCMC Parking Lot Improvement Project and Colston Bldg. Demo.

1. enduring sustained extreme loud noise and earth shaking daily, for months during demo
2. being exposed to extreme dust and airborne hazardous particulates during demo
3. dramatic loss of natural vista as mature Liquid Amber Trees and Canary Island Palms which housed raptors and migrating birds were destroyed
4. now that the trees are gone, there is new exposure to light pollution from the existing parking lot on the other side of Hillmont.
5. loss of property value (Homes are demonstrated to be less sellable and sell for lower prices when adjacent areas become industrialized.)

The 10 new 28' tall LED light standards creates grave concern.

In attempt to preserve our current property values and our right to a peaceful, suburban residential experience, that we have invested in upon purchasing our homes and have enjoyed for decades, we want to request that the County create an addendum to plan to include additional screening landscaping by planting a row of tall dense foliage trees as outlined in attached drawing. This action would help mitigate much concern and demonstrate to the community that the County can be a good neighbor.

Please recognize that we as residents, do not have the ability to plant large trees on our properties considering that we bear the burden of the Utility Easement on our East Property Lines.

Large trees on our property would interfere with the public utility power pole lines.

Please let us know the best way to have our concerned addressed by the County.

Respectfully,  
Monica Gear

*From the personal desk of...*

**MONICA GEAR**  
**332 Estrella Street**  
**Ventura CA 93003**

**Commenter:** Brian Gear

**Date:** January 30, 2023

**Response:**

See responses to Monica Gear's January 25, 2023 email.

**From:** [Robert W. Garven Jr.](#)  
**To:** [Robert W. Garven Jr.](#)  
**Cc:** [Nallamala, Devi](#); [Monica Gear](#); [LaVere, Matt](#); [McGraw, Ian](#); [Zenner, Diana](#); [Carroll, Matt](#); [timetogarden@hotmail.com](#); [Brian Gear](#); [Cleansay, Maruja](#); [Paul Klein](#); [Brennan, Brian](#); [Solorzano, Lourdes](#); [JOHN CARR](#); [Armando Torres](#); [Maria Diaz](#); [dhalter@cityofventura.ca.gov](#)  
**Subject:** Re: VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization  
**Date:** Friday, February 17, 2023 7:57:15 PM

---

**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

All,

Please excuse me, I am sorry my spell check went crazy today, below is what I meant. Rob

On Feb 16, 2023, at 2:53 PM, Robert W. Garven Jr. <[robertgarven@earthlink.net](mailto:robertgarven@earthlink.net)> wrote:

Devi and all,

I have not responded earlier because I've been out of town. After looking over the report and plans I agree with Monica and I'm hoping that your project includes some kind of planter or landscaping barrier that would somehow shield our highly exposed properties from either light pollution or noise. Now that the previously existing buildings have been removed, there's quite a bit of light just from the parking lot on the other side of Hillmont St. I'm also hoping that you will ask your contractors to try to provide some kind of lighting fixtures ~~the point of sideways is everyone on the side of Australia streets gonna~~ *that point downwards as everyone on Estrella Street will* be affected by this project.

Our other concern is the drainage portion of the construction which is right behind my house and my neighbor's house. I couldn't find a more detailed explanation about what that's going to be. Is it going just to be some sort of drain for the parking lot and the road behind our houses, or is it going to have a different function? Will their be pumps etc causing noise.

I know you probably think some of us are a nuisance, but we've lived here for many years peacefully, and had to live through all the construction of the hospital and other buildings. This is our home and we're very proud of our properties and our street. It has been a wonderful place to live, and we're just hoping that you're going to do everything in your power to make this new construction impact us less significantly that we are imagining. A nice planter median with landscaping trees right next to the access road right behind our walls could shield much of the light from the project into our backyards, living and bed rooms.

Sincerely

Rob Garven & Lynn Latourell  
324 Estrella St.

On Feb 9, 2023, at 11:50 AM, Nallamala, Devi <[Devi.Nallamala@ventura.org](mailto:Devi.Nallamala@ventura.org)> wrote:

Good Morning Monica,

Thank you for your participation and review, all the comments submitted during the public comment period will be reviewed and evaluated at the end of the comment period (I.e. February 21, 2023).

I appreciate your patience.

Thank you,  
Devi

---

**From:** Monica Gear <[venturagear@hotmail.com](mailto:venturagear@hotmail.com)>  
**Sent:** Thursday, February 9, 2023 9:39 AM  
**Cc:** Nallamala, Devi <[Devi.Nallamala@ventura.org](mailto:Devi.Nallamala@ventura.org)>; LaVere, Matt <[Matt.LaVere@ventura.org](mailto:Matt.LaVere@ventura.org)>; McGraw, Ian <[Ian.McGraw@ventura.org](mailto:Ian.McGraw@ventura.org)>; Zenner, Diana <[Diana.Zenner@ventura.org](mailto:Diana.Zenner@ventura.org)>; Carroll, Matt <[Matt.Carroll@ventura.org](mailto:Matt.Carroll@ventura.org)>; Robert Garven <[robertgarven@earthlink.net](mailto:robertgarven@earthlink.net)>; [timetogarden@hotmail.com](mailto:timetogarden@hotmail.com); Brian Gear <[gearski@hotmail.com](mailto:gearski@hotmail.com)>  
**Subject:** Re: VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization


**WARNING:** If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Greeting Devi and All,  
Please provide confirmation that you are in receipt of my email below dated January 25, 2023 at 11:45am.

We have not received any form of acknowledgement that our concerns are being addressed or even heard.

If there is another contact that we should be communicating through please provide.

Your immediate attention would be greatly appreciated.  
Respectfully, Monica Gear

*From the personal desk of...*  
 **MONICA GEAR (805)746-9598**

On Jan 30, 2023, at 9:13 AM, BRIAN GEAR <[gearski@hotmail.com](mailto:gearski@hotmail.com)> wrote:

Devi,

Including Matt, our elected official that represents Ventura, for his visibility of our concerns and request to plant trees to mitigate eyesore, noise and light pollution. Please see email from my wife Monica below. We look forward to hearing back from you on this very sensitive matter.

Brian Gear  
Ventura, Ca

---

**From:** Monica Gear <[venturagear@hotmail.com](mailto:venturagear@hotmail.com)>  
**Sent:** Wednesday, January 25, 2023 11:45 AM  
**To:** [devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org) <[devi.nallamala@ventura.org](mailto:devi.nallamala@ventura.org)>  
**Cc:** Brian Gear <[gearski@hotmail.com](mailto:gearski@hotmail.com)>; Robert Garven <[rgarven@gmail.com](mailto:rgarven@gmail.com)>; Paul Klein <[pklein7531@aol.com](mailto:pklein7531@aol.com)>; Shirley And Chris Hacklman <[timetogarden@hotmail.com](mailto:timetogarden@hotmail.com)>; JOHN CARR <[jcarrgp@gmail.com](mailto:jcarrgp@gmail.com)>

**Subject:** VCMC Parking Lot Improvement Project - Concerns Light Pollution/Industrialization

Greetings Devi, (et al),

Please review attachment that includes the following:

- a. Plan View outlining proposed additional screening landscaping by planting row of tall dense foliage trees by the County.
- b. images of newly occurring light pollution being experienced (from all the way across Hillmont) into our backyards and before image of backyard vista over the Colston Bldg.

The residents of Estrella Street have been impacted in many ways from the VCMC Parking Lot Improvement Project and Colston Bldg. Demo.

1. enduring sustained extreme loud noise and earth shaking daily, for months during demo
2. being exposed to extreme dust and airborne hazardous particulates during demo
3. dramatic loss of natural vista as mature Liquid Amber Trees and Canary Island Palms which housed raptors and migrating birds were destroyed
4. now that the trees are gone, there is new exposure to light pollution from the existing parking lot on the other side of Hillmont.
5. loss of property value (Homes are demonstrated to be less sellable and sell for lower prices when adjacent areas become industrialized.)

The 10 new 28' tall LED light standards creates grave concern.

In attempt to preserve our current property values and our right to a peaceful, suburban residential experience, that we have invested in upon purchasing our homes and have enjoyed for decades, we want to request that the County create an addendum to plan to include additional screening landscaping by planting a row of tall dense foliage trees as outlined in attached drawing. This action would help mitigate much concern and demonstrate to the community that the County can be a good neighbor.


Please recognize that we as residents, do not have the ability to plant large trees on our properties considering that we bear the burden of the Utility Easement on our East Property Lines.

Large trees on our property would interfere with the public utility power pole lines.

Please let us know the best way to have our concerns addressed by the County.

Respectfully,  
Monica Gear

*From the personal desk of...*

 **MONICA GEAR**  
**332 Estrella Street**  
**Ventura CA 93003**



**Commenter:** Robert Garven, Jr.

**Date:** February 17, 2023

**Response:**

See responses to Monica Gear's January 25, 2023 email.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-0067  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

February 10, 2023

Devi Nallamala, Ventura County Public Works Agency  
Project Manager  
800 South Victoria Avenue  
Ventura, CA 93009

RE: Ventura County Medical Center Parking Lot  
Improvements – Negative Declaration (ND)  
SCH# 2023010327  
GTS# 07-LA-2023-00531  
Vic. LA Multiple

Dear Devi Nallamala,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project would consist of construction for an approximately 1.7 acre parking lot to include 139 standard parking spaces, two bi-directional access driveways from Hillmont Avenue, ten LED light fixtures mounted on 28-foot-tall light standards, irrigated landscaping along Hillmont Avenue, a 6,175 square foot storm water treatment area to detain and treat storm water run-off including a percolation basin/vegetated bioswale, screening landscaping immediately east of the storm water treatment area, and fencing along the perimeter of the storm water treatment area. The project would be located at the former Colston Youth Center site and extend an additional 150 feet to the north. The proposed parking lot would serve Ventura County Medical Center (VCMC), including staff, patients, and visitors.

After reviewing the ND, Caltrans has the following comments:

Currently the project is designed in a way that will lead to a net increase in 139 surface parking spaces to Ventura County Medical Center's existing parking supply. With the provision of additional parking spaces, the project may induce additional Vehicle Miles Traveled (VMT), which is in conflict with California's established goals and mandates for Greenhouse Gas (GHG) reduction. Although the Ventura County Initial Study Assessment Guidelines have not been updated to address revisions to the State CEQA Guidelines (Section 15064.3), and regardless if it is to access a new or existing land use, car parking objectively induces demand to drive over walking, biking, or public transit.

Caltrans acknowledges and supports development that ultimately helps Californians to meet its climate, transportation, and livability goals. However, the project creates a new supply of personal car storage at the existing destination, encouraging further automobile usage, rather than public transit, as a primary form of transportation. Therefore, the proposed project would be expected to induce demand for additional vehicle trips and contribute towards long-term operational GHG emissions.

Caltrans recommends a reduction in the amount of overall car parking supplied to act against enabling driving over other methods of transit. Research indicates that removing excess car parking is a proven method of reducing trip demand which encourages patients, visitors, and staff to utilize alternative modes of active transportation such as the complimentary VCMC Shuttle Service. If surface parking must be built, it is advised that it does not face the street directly. An effort should be made to incorporate project design features that encourage recreational and transportation walking, such as the implementation of active frontage and landscaping against the sidewalk.

As proposed, the Project puts an auto-oriented land use where more walking, biking, and transit options could be implemented, with no conditions to provide for additional bike lanes or bus service stops. Caltrans encourages the Lead Agency to consider the implementation of Transportation Demand Management (TDM) strategies for existing lots in proximity to VCMC, and a larger range of transportation options as an alternative to building an excessive amount of parking.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2023-00531.

Sincerely,

*Miya Edmonson*  
MIYA EDMONSON  
LDR Branch Chief

cc: State Clearinghouse

**Commenter:** Miya Edmonson, California Department of Transportation

**Date:** February 10, 2023


**Response:**

VCMC and the project area includes facilities to promote alternative modes of transportation, including bike racks, bike lanes, bus stops and a parking lot shuttle. Given the parking lot would serve a hospital, many parking lot users could not utilize alternative active transportation modes, such as biking. In addition, using the overflow parking lot north of the VCMC campus requires patients to walk up/down a steep narrow road which poses safety concerns for less ambulatory patients. Overall, the proposed project does not constitute "... an excessive amount of parking".



**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Devi Nallamala, Project Manager DATE: February 14, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division 

SUBJECT: Negative Declaration for the Ventura County Medical Center Parking Lot Improvements Project

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Negative Declaration (ND), which analyzed the environmental impacts of a project that involves the construction of an additional parking lot to serve the Ventura County Medical Center's (VCMC) existing staff, visitors, and patients. The proposed project includes a 1.7-acre asphalt concrete parking lot with 139 parking spaces and stormwater treatment area. The Lead Agency is the Ventura County Public Works Agency.

APCD has the following comments regarding the project's ND.

**General Comments**

- 1) Page 10-12. In addition to the air emission reduction measures being incorporated into the project, as the ND states in Page 10, APCD recommends them being enforceable by adding them to any discretionary permits (grading, etc.) and/or stating so in the ND.
- 2) Page 37, 4<sup>th</sup> paragraph. The 2022 California Air Resources Board Scoping Plan is no longer in progress but was adopted on December 15, 2022. In addition, the carbon neutrality target year is 2045, not 2050 as the ND states. More information on the Scoping Plan can be found [here](#).
- 3) Page 38. APCD requests Table 4 be re-labelled to indicate the emissions are construction-related in order to avoid confusion for the public reviewers.

Thank you for the opportunity to comment on the project ND. If you have any questions, you may contact me at [nicole@vcapcd.org](mailto:nicole@vcapcd.org).

**Commenter:** Nicole Collazo, Ventura County Air Pollution Control District

**Date:** February 14, 2023

**Response:**

1. There are no discretionary permits required for the proposed project. However, it is anticipated standard dust control measures will be included in the construction contracts.
2. The referenced text in the ND has been updated.
3. Table 4 of the ND has been revised as suggested.