



ADDENDUM TO THE
ENVIRONMENTAL IMPACT REPORT

Ventura County
2040 General Plan
(State Clearinghouse #2019011026)

PREPARED FOR:
County of Ventura

AUGUST 2021

Addendum to the Environmental Impact Report for the Ventura County 2040 General Plan (State Clearinghouse #2019011026)

Ventura County 2021-2029 Housing Element

Prepared for:

County of Ventura

Contact:

Jennifer Butler, Senior Planner
(805) 654-2495

Prepared by:



Ascent Environmental, Inc.
1230 Columbia Street, Suite 440
San Diego, California 92101

Contact:

Andrew Martin
619.417.4218

August 2021

TABLE OF CONTENTS

Section	Page
LIST OF ABBREVIATIONS	II
1 INTRODUCTION.....	1-1
1.1 Background and Action Triggering the Addendum.....	1-1
1.2 Previous Environmental Analysis.....	1-1
1.3 Requirements for California Environmental Quality Act Review After an Environmental Impact Report Has Been Certified	1-1
2 PROJECT DESCRIPTION.....	2-1
2.1 Project location	2-1
2.2 Housing Element Requirements.....	2-1
2.3 Proposed Housing Element.....	2-2
3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW.....	3-1
3.1 Explanation of Checklist Evaluation Categories	3-1
3.2 Environmental Checklist.....	3-2
4 ENVIRONMENTAL CHECKLIST.....	4-1
4.1 Aesthetics, Scenic Resources, Light Pollution.....	4-1
4.2 Agriculture and Forestry Resources	4-4
4.3 Air Quality.....	4-6
4.4 Biological Resources.....	4-9
4.5 Cultural, Tribal Cultural, and Paleontological Resources.....	4-11
4.6 Energy.....	4-13
4.7 Geologic Hazards.....	4-15
4.8 Greenhouse Gas Emissions	4-18
4.9 Hazards, Hazardous Materials, and Wildfire.....	4-20
4.10 Hydrology and Water Quality	4-23
4.11 Land Use and Planning.....	4-28
4.12 Mineral and Petroleum Resources	4-30
4.13 Noise and Vibration.....	4-33
4.14 Population and Housing	4-36
4.15 Public Services and Recreation.....	4-38
4.16 Transportation and Traffic.....	4-41
4.17 Utilities.....	4-44
Tables	
Table 2-1 Housing Inventory Summary for Lower, Moderate, and Above Moderate-Income Categories	2-3
Table 2-2 Summary of Housing Element Goals and Policies.....	2-4
Table 2-3 Summary of Housing Element Implementation Programs.....	2-5

LIST OF ABBREVIATIONS

ADU	accessory dwelling unit
BMP	best management practice
HCD	California Department of Housing and Community Development
CEQA	California Environmental Quality Act
EIR	environmental impact report
ESHA	environmentally sensitive habitat areas
RHNA	Regional Housing Needs Allocation
RRN	Regional Road Network
SCAG	Southern California Association of Governments
TAC	toxic air contaminant
VCAPCD	Ventura County Air Pollution Control District

1 INTRODUCTION

1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

This addendum to the Environmental Impact Report (EIR) for the Ventura County 2040 General Plan (Case No. PL17-0141; State Clearinghouse # 2019011026; General Plan) evaluates differences between implementation of the proposed 2021-2029 Housing Element ("Housing Element") and the General Plan evaluated in the certified EIR for changes that may require additional analysis under California Environmental Quality Act (CEQA). The General Plan applies to the jurisdiction of the County of Ventura, which includes the unincorporated areas of Ventura County. Throughout this document, the following jurisdictional and geographic definitions will be used: "Ventura County" includes the cities as well as the unincorporated areas of the County of Ventura. "County of Ventura" or "County" includes only the unincorporated areas of Ventura County. The Goals, Policies, and Programs only apply to the County.

As the lead agency under the CEQA, the County has prepared this addendum to the EIR for the Housing Element. This addendum is organized as an environmental checklist and establishes that the Housing Element would not meet the conditions outlined in State CEQA Guidelines sections 15162 and 15163 requiring the preparation of a subsequent EIR or supplemental EIR and would meet the conditions in State CEQA Guidelines Section 15164, which authorizes CEQA compliance through the approval of an addendum to a previously certified environmental document. A description of the EIR is provided in Section 1.2, "Previous Environmental Analyses," and a description of the Housing Element is provided in Chapter 2, "Project Description."

1.2 PREVIOUS ENVIRONMENTAL ANALYSIS

On September 15, 2020, the Ventura County Board of Supervisors adopted the General Plan and certified the EIR. The General Plan consists of nine elements, including the 2014-2021 Housing Element (Current Housing Element). The Current Housing Element remains effective until the 2021-2029 Housing Element is adopted and certified or until October 15, 2021 (plus statutory extensions). The EIR assessed the environmental impacts in the County that would result from: physical changes that could result from development pursuant to land use designations established in the General Plan, implementation of policies and programs identified in the General Plan, and offsite or indirect development necessitated by the General Plan (e.g., new facilities, infrastructure upgrades). The EIR also included mitigation measures to substantially lessen or avoid environmental impacts that were potentially significant.

Additionally, the EIR identified significant and unavoidable impacts for the following environmental topics: agriculture and forestry resources; air quality; biological resources; cultural, tribal cultural, and paleontological resources; greenhouse gas (GHG) emissions; hazards, hazardous materials, and wildfire; mineral and petroleum resources; noise and vibration; public services and recreation; transportation and traffic; and utilities. Accordingly, the County adopted a Statement of Overriding Considerations to certify the EIR. It also identified potentially significant impacts that would be less-than-significant with adoption of mitigation measures for aesthetics, scenic resources, and light pollution. For energy, geologic hazards, hydrology and water quality, land use and planning, and population and housing, the EIR identified less than significant impacts.

1.3 REQUIREMENTS FOR CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW AFTER AN ENVIRONMENTAL IMPACT REPORT HAS BEEN CERTIFIED

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under CEQA. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three mechanisms to address these changes: 1) a subsequent environmental impact report (Subsequent EIR or SEIR), 2) a supplement to an EIR (Supplemental EIR), 3) a negative declaration, or 3) an addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which an SEIR shall be prepared. In summary, when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) any of the conditions described above for Section 15162 would require the preparation of a subsequent EIR; and
- (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

An addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with Public Resources Code (PRC) Section 21166 and State CEQA Guidelines Sections 15162, 15163, and 15164.

Based on the criteria above, the County has determined that an addendum is the appropriate CEQA document for the Housing Element. This addendum is intended to evaluate and confirm CEQA compliance for the Housing Element, which would be a change relative to the General Plan described and evaluated in the EIR. This addendum is organized as an environmental checklist and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to implementation of the General Plan, and determine whether such changes were or were not adequately covered in the EIR. The purpose of this checklist is to evaluate the checklist categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the EIR. The checklist is based on the EIR thresholds of significance, which in turn are based on Ventura County's Initial Study Assessment Guidelines (ISAG); the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and the applicable regulatory standards of the County and federal and State agencies. The column titles of the checklist have been provided to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, and 15164.

2 PROJECT DESCRIPTION

This chapter describes the Housing Element, including background information on State housing element requirements, a review of the County's Regional Housing Needs Allocation (RHNA) for this planning period, an overview of the County's projected housing inventory to meet assigned RHNA targets, and a summary of proposed housing goals, policies, and programs for the new planning period with a focus on new programs.

2.1 PROJECT LOCATION

The project location for the Housing Element is the unincorporated area of Ventura County.

2.2 HOUSING ELEMENT REQUIREMENTS

The housing element is a State-mandated element, or chapter, of the County's General Plan with distinct statutory requirements, found in California Government Code sections 65580-65589. Its purpose is to establish the County's housing goals and provide the policy background for housing programs implementing the County's housing goals and decisions. It is the only general plan element that must be updated on a set schedule and then certified by the California Department of Housing and Community Development (HCD). HCD is the State agency responsible for determining compliance of a jurisdiction's housing element with State housing law. Several new housing laws created or amended since adoption of the existing housing element will be addressed by the proposed Housing Element, including:

- ▶ Obligation to Affirmatively Further Fair Housing (AB 686)
- ▶ New Site Inventory Requirements (AB 1397, AB 1486, AB 686, SB 6)
- ▶ No Net Loss Law (SB 166)
- ▶ Accessory Dwelling Unit Plan (AB 671)
- ▶ Low Barrier Navigation Centers (AB 101)
- ▶ Additional Analysis requirements for Governmental and Nongovernmental Constraints (AB 879)

2.2.1 Housing Element Timeline

The timeline for the adoption of each jurisdiction's housing element is set by State law. (Gov. Code, §65588.) Because of the mandated schedule, updates to a jurisdiction's housing element and general plan are often not aligned. For this reason, the County's 2040 General Plan adopted on September 15, 2020, does not include the 2021-2029 Housing Element. The County's adopted housing element for the 5th cycle planning period covering 2013-2021 was certified by HCD on December 9, 2013 and is still effective and was therefore included in the adopted 2040 General Plan. The County's adopted 2013-2021 housing element remains in effect until October 15, 2021 (plus statutory extensions). The Housing Element is for the 6th cycle housing element planning period which begins on October 15, 2021 and runs until October 15, 2029.

2.2.2 Regional Housing Needs Allocation

State law requires each council of governments to prepare allocation plans for all cities and counties within its jurisdiction. Ventura County is one of six counties within the Southern California Association of Governments (SCAG) region. The SCAG Regional Council approved the Final RHNA Allocation Plan for the region on March 4, 2021 for the 2021-2029 8-year planning period. SCAG allocated 1,259 housing units to unincorporated Ventura County for the 2021 to 2029 planning period. This is an increase of 244 dwelling units from the previous planning period, most of this attributable to an approximately 30% increase in the allocation of housing affordable to households earning less than 120 percent of the median area income, or less than \$117,360 annually.

The total County allocation is equivalent to a need of approximately 157 housing units each year for the eight-year planning period. Of the 1,259 housing units in unincorporated Ventura County, 249 are to be affordable to moderate-income households, 225 to low-income households, and 317 to very low-income households. The State does not require the County to construct the housing units in its RHNA targets, but it does require the County to identify adequate sites in the Housing Element sites inventory to meet the number and household income level of the units assigned.

2.3 PROPOSED HOUSING ELEMENT

To align with the 2040 General Plan and new State laws, the Housing Element has been significantly restructured, reorganized, and reformatted from the Current Housing Element. It has been structured to comply with State housing laws by addressing, among other things, the following:

- ▶ An overview of the unincorporated County's population and housing characteristics;
- ▶ An evaluation of housing implementation programs from the 2013-2021 housing element completed by the County during the 2013-2021 planning period;
- ▶ An assessment of housing needs by income and special needs;
- ▶ An analysis and review of governmental and non-governmental constraints to housing production;
- ▶ Identification of vacant and underutilized land and a summary of residential projects in the pipeline that can accommodate the RHNA targets of 1,259 housing units with 542 units affordable to lower income households; and,
- ▶ Creation of goals, policies, and programs that demonstrate the County's efforts to achieve identified housing needs and minimize constraints.

Discussion of the Housing Element sites inventory to accommodate the County's RHNA targets and the goals, policies, and programs of the Housing Element are provided below.

2.3.1 Sites Inventory

The Housing Element includes an inventory of land zoned for housing that identifies specific sites, describes existing uses on the sites and the densities permitted, and identifies how many dwelling units can be accommodated on each site to show that the RHNA target can be accommodated. Additionally, the inventory must identify whether the site is suitable for lower, moderate, or above moderate-income housing.

The Housing Element inventory identifies enough land to meet the 6th Cycle (2021–2029) RHNA targets for all income levels. As a result, changes to 2040 General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets and different or new land use or zoning designations are not proposed as part of the Housing Element.

Table 2-1 provides a summary of how the RHNA targets at the assigned income categories will be met for the 2021-2029 planning period. The Housing Element proposes a diversified approach to the lower income housing inventory, with four main components: (1) encouraging multifamily housing on sites already zoned Residential High Density (RHD), which allows 20 dwellings per acre; (2) accommodating and incentivizing accessory dwelling units and junior accessory dwelling units; (3) encouraging development of agricultural worker housing such as farmworker dwelling units and complexes; and (4) counting pending and approved residential projects for lower-income households, including senior rental apartments at California State University Channel Islands, a supportive housing development proposed by Many Mansions and ministerially approved on county-owned land on Lewis Road, and approved subdivisions in Piru.

Table 2-1 Housing Inventory Summary for Lower, Moderate, and Above Moderate-Income Categories

	Lower Income (less than 80% of median)	Moderate Income (80-120% of median)	Above- Moderate Income (greater than 120% of median)	Total
Existing RHD Zoned Sites (20 du/acre)	220	—	30	250
ADUs and JADUs	258	235	67	560
Farmworker Dwelling Units	8	—	—	8
Pending or Approved Residential Projects				
CSUCI University Glen Phase 2 (Approved)	170	310	120	600
Somis Ranch Farmworker Housing Complex, Phase 1 and 2 (Approved)	200	—	—	200
Rancho Sierra Supportive Housing Project (Approved)	50	—	—	50
Reider Subdivision in Piru (Approved)	5	44	—	49
Finch Subdivision in Piru (Approved)	—	113	62	175
Vacant Sites in Existing Communities				
Camarillo Heights/Las Posas Estates	—	—	51	51
Bell Canyon	—	—	62	62
Santa Rosa Valley	—	—	12	12
Lake Sherwood	—	—	76	76
Total	911	702	480	2,093
2021–2029 RHNA	544	250	468	1,262
Surplus Units (as a percentage of RHNA)	367 (67%)	452 (181%)	12 (3%)	831 (66%)

2.3.2 Goals, Policies, and Programs

The Housing Element goals, policies and programs expound on the County’s housing priorities and identify strategies to provide housing opportunities to households of varying income levels and the special needs population as well as identify adequate sites for new housing units for the next 8 years in accordance with State law.

Many goals, policies, and programs of the Current Housing Element would be retained in the Housing Element as they remain applicable for the next eight-year period. Others no longer fit the current needs and issues of the unincorporated County and will be removed. The deleted programs include programs that required population forecasting and monitoring that is now conducted by SCAG rather than by County staff and programs that have already been accomplished.

The Housing Element includes five goals, 32 policies, and 26 implementation programs. It sets out policies that support each goal statement. The implementation programs briefly describe the proposed action, the County agency or department with primary responsibility for carrying out the program, and the timeframe for accomplishing the program. The goals and policies are summarized in Table 2-2 below. The entire Housing Element is available at: <https://vcrma.org/housing-element-update>.

Table 2-2 Summary of Housing Element Goals and Policies

Goal Statement	Policy Summary
<p>Goal 1. Conserve and improve the existing housing stock within the unincorporated areas of Ventura County</p>	<ul style="list-style-type: none"> ▶ Policy 1.1: The County would provide support for Code Compliance Division to ensure housing meets basic health, safety, fire, requirements, and other applicable codes and standards. ▶ Policy 1.2: The County would collaborate with other regional agencies to find opportunities to subsidize and incentivize residential energy conservation. ▶ Policy 1.3: The County would collaborate with other public and private agencies to provide funding for residential rehabilitation programs for lower income neighborhoods. ▶ Policy 1.4: The County would assure preservation of affordable housing in the Coastal zone in compliance with the Mello Act; ▶ Policy 1.5: The County would coordinate with State and federal government to expedite replacement of housing after natural disasters. ▶ Policy 1.6: The County would continue to preserve existing mobile and manufactured homes.
<p>Goal 2. Provide Adequate Sites for Residential Development</p>	<ul style="list-style-type: none"> ▶ Policy 2.1: The County would zone an adequate inventory of sites to accommodate the region's Regional Housing Needs Allocation (RHNA). ▶ Policy 2.2: The County would increase opportunities for housing sites within the Plan Area by encouraging diverse housing types such as duplexes and triplexes, identifying surplus land, identifying sites appropriate for transit-oriented development, and by seeking funding opportunities for public infrastructure improvements. ▶ Policy 2.3 The County would adhere to "no-net loss considerations when considering rezoning of residentially zoned properties. ▶ Policy 2.4: The County shall collaborate with the Southern California Association of Governments (SCAG) to ensure use of accurate data to inform the region's transportation plan (RTP/SCS). ▶ Policy 2.5: The County would seek to negotiate RHNA transfer agreements with any city proposing to annex unincorporated land from the County. ▶ Policy 2.6: The County would incentivize construction of accessory dwelling units (ADU)s. ▶ Policy 2.7: The County would allow development of by-right housing on sites previously approved in housing element cycles. ▶ Policy 2.8: The County would identify surplus land suitable for affordable housing and offer first right of refusal to affordable housing entities.
<p>Goal 3. Encourage Affordable Housing to Meet the Special Needs of County Residents</p>	<ul style="list-style-type: none"> ▶ Policy 3.1: The County would prioritize provision of housing assistance for vulnerable populations and groups with demonstrated specific needs such as low-income families, seniors, persons with disabilities or mental illness, people experiencing domestic violence, and more. ▶ Policy 3.2: The County would continue to apply for State and federal assistance for financing affordable housing provision. ▶ Policy 3.3: The County would provide incentives for affordable housing development such as density bonuses. ▶ Policy 3.4: The County would consider surplus County owned land for lower-income housing and emergency shelters. ▶ Policy 3.5: The County would promote housing for lower-income households that align with the rural and agricultural character and economic needs of Ventura County, such as farmworker housing. ▶ Policy 3.6: The County would ministerially process affordable housing entitlements for by-right development as identified by State law. ▶ Policy 3.7: The County would continue to support the County's Continuum of Care program to end homelessness and provide social services to persons that are experiencing or at risk of experiencing homelessness. ▶ Policy 3.8: The County would support and identify housing needs of farmworkers in the County. ▶ Policy 3.9: The County would support efforts to increase supportive housing for persons with disabilities. ▶ Policy 3.10: The County would encourage housing design that meets the needs of large, multigenerational, or extended families to reduce overcrowding and to maintain affordability of the existing housing stock.

Goal Statement	Policy Summary
Goal 4. Remove Housing Development Constraints	<ul style="list-style-type: none"> ► Policy 4.1: The County would promote ministerial approval of housing developments by committing the County to update its regulations and standards to enable the application of objective development standards to housing projects. ► Policy 4.2: The County would modify local regulations as appropriate to remove unnecessary obstacles to planned densities. ► Policy 4.3: The County would encourage water and sanitation providers to pursue available funding to upgrade and expand necessary utility infrastructure such as for water and broadband services. ► Policy 4.4: The County would promote innovative housing types and encourage the use of alternative construction methods and materials to reduce costs.
Goal 5. Fair Housing	<ul style="list-style-type: none"> ► Policy 5.1: The County would take action toward the goal of eliminating housing discrimination and providing residents with housing opportunity. ► Policy 5.2: The County would continue to promote equal housing opportunity for persons regardless of race, religion, sex, age, marital status, national origin, employment, or other protected statuses or arbitrary factors. ► Policy 5.3: The County would maintain programs that expand the range of affordable housing choices for minorities and lower-income households. ► Policy 5.4: The County would connect residents, especially lower-income residents, to Federal, State, and Local programs that provide housing support and related services.

In addition, the Housing Element includes ongoing, continued, new and modified programs to reflect new housing laws, needs, and opportunities that have arisen since adoption of the existing housing element. Housing Element programs are summarized in Table 2-3.

Table 2-3 Summary of Housing Element Implementation Programs

Housing Element Program	Summary of Program
Ongoing Programs	
A. Local, State and Federal Funding	The County would continue to administer grant/loan programs to assist lower-income households with housing and community related issues.
B. Mobile Home Park Rent Control	The County would continue to staff the Mobile Home Park Rent Review Board to administer the County's Mobile Home Park Rent Control Ordinance.
J. Compliance with State housing laws	The County would continue to update zoning ordinance and Planning Division procedures as needed to remain in compliance with State laws.
L. Fair Housing Program	The County would continue to contract with the Housing Rights Center to provide services to ensure fair and equal housing opportunity and to continue to prepare an Assessment of Impediments to Fair Housing to affirmatively further fair housing.
Continued Programs	
K. Inclusionary Housing and Housing Impact Mitigation Fee Assessment	The County would continue to analyze the effectiveness and explore options to implement an Inclusionary Housing and Housing Impact Mitigation Fee Program.
New Programs	
C. ADU Homeowner Tools	The County would develop web-based educational tools for homeowners related to ADUs in both English and Spanish.
D. Infrastructure Constraints	The County would work with stakeholders to identify and overcome constraints to providing water, sewer, and dry utility services for housing. The County would also apply to existing funding programs to finance infrastructure improvement efforts in disadvantaged communities.
E. Farmworker Housing Study	The County would prepare a comprehensive countywide assessment of the local farmworker population, including a farmworker population count and an analysis of both the barriers and potential solutions to providing more farmworker housing. The County would coordinate with

Housing Element Program	Summary of Program
	other jurisdictions and advocacy groups to seek funding for a comprehensive study and a resulting action plan to address identified barriers.
F. Annual Progress Report	The County would annually submit a report to HCD on the statistic of the County's progress in implementing Housing Element programs.
G. RHNA Transfer Study	The County would prepare a RHNA transfer program for consideration by the Board of Supervisors in which RHNA credit could be transferred or shared between the County and a city where annexation of an unincorporated site within a City Sphere of Influence occurs.
H. RHD Zone Ordinance Amendments	The County would remove the requirement that housing in Residential High Density (RHD) zones be 100% affordable in the Non-Coastal Zoning Ordinance.
I. Participation in Regional Planning Efforts	The County would coordinate with SCAG to identify future housing targets for unincorporated areas in future Regional Transportation Plans prepared by SCAG.
M. Density Bonus Ordinance Update	The County would update the Density Bonus Ordinance to be consistent with State law.
N. Zoning Code Amendments for Special Needs Housing	The County would amend the Coastal and Non-Coastal Zoning Ordinances to ensure compliance with State law.
O. Funding for the Housing Trust Fund	The County would continue to support the efforts of the Housing Trust Fund of Ventura County, an independent non-profit organization.
P. Maintain Senior Housing at Mobile Home Parks	The County would maintain senior occupancy of designated Senior Mobile Home Parks at 80% or more pursuant to the adopted Senior Mobile Home Park Overlay Zone.
Q. Housing Choice Vouchers	The County would continue to participate in the Housing Choice Vouchers program administered by the Area Housing Authority of the County of Ventura.
R. First-Time Homebuyer Assistance	The County would provide Down Payment Assistance to expand homeownership opportunities in Ventura County.
S. Development Review Committee Fee Waiver	The County would waive the fee for a pre-application Development Review Committee meeting with relevant County agencies for proposed 100% affordable housing projects.
T. Publish Clear Permit Approval Procedures	The County would publish approval procedures by maintaining an updated webpage with Spanish translation.
U. Modular Accessory Dwelling Units (ADUs) and Garage Conversion Building Plans	The County would utilize a Ventura Council of Governments (VCOG) regional ADU program that will provide free design plans for ADU garage conversions and less expensive modular ADUs to incentivize ADUs.
V. Code Compliance	The County would encourage the rehabilitation of substandard residential properties and report the results bi-annually.
W. Home Rehabilitation	The County would partner with non-profit organizations such as Habitat for Humanity to provide home rehabilitation assistance for homes owned by low-income families, veterans, and elderly residents on limited incomes.
X. HomeShare	The County would administer the HomeShare program, which matches home providers with home seekers in exchange for minimal rent and/or services.
Y. Inclusive Community Representation	The County would actively recruit county residents in low opportunity neighborhoods to serve or participate on boards, committees, and other local government bodies to foster inclusive communities and further fair housing objectives.
Z. ADU Monitoring	The County would track new ADUs and collect information on the use and affordability of these units.

3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The purpose of this checklist is to evaluate whether the Housing Element would cause any of the conditions identified in the California Environmental Quality Act (CEQA) section 21166 or CEQA Guidelines section 15162 requiring the preparation of a supplemental or subsequent environmental impact report (EIR) as compared to the Final EIR for the Ventura County 2040 General Plan (General Plan EIR or EIR) (State Clearinghouse # 2019011026). The row titles of the checklist include the full range of environmental topics presented in the General Plan EIR. The column titles of the checklist have been formatted to incorporate the criteria from CEQA Section 21166 and State CEQA Guidelines Section 15162 addressing when a subsequent EIR, supplement to an EIR, or an addendum to an EIR shall be prepared. A "no" answer indicates that the Housing Element presents no change in the condition or status of an impact previously analyzed and adequately addressed with mitigation measures in the General Plan EIR. For instance, an environmental topic might be answered with a "no" in the checklist because an impact resulting from Housing Element implementation was adequately addressed in the General Plan EIR, and the environmental impact significance conclusions of the General Plan EIR remain applicable for the Housing Element. The purpose of each column of the checklist is further described below.

3.1.1 Any Project Changes or New Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to sections 15162(a)(1) and 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been substantial changes proposed to the approved 2040 General Plan or changes in the circumstances under which the Housing Element is undertaken that have occurred subsequent to certification of the General Plan EIR, which would result in Housing Element implementation having new significant environmental impacts that were not identified in the General Plan EIR or would result in substantial increases in the severity of previously identified significant impacts.

3.1.2 Any New Information of Substantial Importance?

Pursuant to section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the General Plan EIR was certified as complete is available, requiring an update to its analysis to verify that the environmental conclusions and mitigation measures remain valid. New information is considered to be of "substantial importance" if it shows that one or more of the following would result: (A) the Housing Element will have one or more new significant effects not discussed in the General Plan EIR; or (B) that significant effects previously examined will be substantially more severe than shown in the General Plan EIR; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Housing Element, but the County declines to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the General Plan EIR would substantially reduce one or more significant effects on the environment, but the County decline to adopt the mitigation measure or alternative.

If there is new information of substantial importance, the question would be answered 'Yes' and require preparation of a subsequent EIR or supplemental EIR. However, if the analysis completed as part of the Environmental Checklist finds that the conclusions of the General Plan EIR remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered 'No' and no supplement to the EIR or subsequent EIR would be required for the Housing Element.

3.2 ENVIRONMENTAL CHECKLIST

Chapter 4 includes separate discussions for each of the environmental topics considered in the Checklist. Each discussion begins with an overview of what was discussed and concluded in the General Plan EIR, and identifies what, if any, significant impacts were concluded for that topic, followed by a summary of the changes in the project and changes in circumstances or new information of substantial importance as it relates to that topic. These details are then the focus of the rest of the environmental analysis, in accordance with State CEQA Guidelines section 15162(a).

4 ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS, SCENIC RESOURCES, LIGHT POLLUTION

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/ No Substantial Change From Previous Analysis
I. Aesthetics, Scenic Resources, Light Pollution.			
Would the Housing Element:			
a) Physically Alter a Scenic Resource that is Visible from a Public Viewing Location?	No	No	Yes
b) Substantially Obstruct, Degrade, Obscure, or Adversely Affect the Character of a Scenic Vista that is Visible from a Public Viewing Location?	No	No	Yes
c) Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network?	No	No	Yes
d) Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of Housing Element project changes as they relate to aesthetics, scenic resources, and light pollution, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to aesthetics, scenic resources, and light pollution. The impact analysis below includes discussion of each of these checklist questions.

4.1.1 Summary of General Plan EIR

The EIR addressed aesthetics, scenic resources, and light pollution in Section 4.1. It identified a potentially significant impact related to creation of new sources of disability and discomfort glare for motorists traveling along a County Regional Road Network (RRN) roadway because development associated with the General Plan could occur in locations visible from RRN roadways (Impact 4.1-3). The EIR included mitigation measure AES-1, which reduced the disability and discomfort glare impact to less than significant by requiring future discretionary development projects to avoid using materials that exceed specified levels of glare.

The EIR did not identify potentially significant impacts related to the physical alteration of a scenic resource that is visible from a public viewing location (Impact 4.1-1), substantially obstructing, degrading, obscuring, or adversely affecting the character of a scenic vista that is visible from a public viewing location (Impact 4.1-2); or creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Impact 4.1-4).

4.1.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to aesthetics, scenic resources, or light pollution impacts.

4.1.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to aesthetics, scenic resources, or light pollution, have been identified during the preparation of this checklist.

4.1.4 Impact Analysis

Would the Housing Element:

- a) Physically Alter a Scenic Resource that is Visible from a Public Viewing Location
- b) Substantially Obstruct, Degrade, Obscure, or Adversely Affect the Character of a Scenic Vista that is Visible from a Public Viewing Location
- c) Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network
- d) Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the County's Regional Housing Needs Allocation (RHNA) targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's RHNA housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

The Housing Element does include programs the County would implement to conserve existing housing stock, provide adequate sites for residential development, encourage affordable housing, remove governmental constraints on housing development, and provide equal housing opportunities, but these policies and programs will not change the findings in the EIR. For example, policies such as Policy 1.3, Policy 1.4, and Policy 1.6 would contribute to rehabilitation and maintenance of affordable housing stock by identifying funding for residential rehabilitation, preserve or replace affordable housing in the Coastal Zone where feasible, and continue to preserve existing mobile and manufactured homes through implementation of existing overlay zones. Policies such as 2.2, 2.6, and 2.8, would direct the County to pursue policies during future Area Plan updates that increase housing opportunities, encourage accessory dwelling units (ADUs) and junior ADUs, and for surplus County land offer first right of refusal to affordable housing entities as required by State law.

Policies to encourage affordable and special-needs housing include Policy 3.2 regarding applying for affordable housing funding; Policy 3.3, providing incentives such as density bonuses for affordable housing development; Policy 3.7, which commits the County to continuing existing programs providing social services and housing to persons experiencing houselessness; Policy 3.8, regarding identification and support for the housing needs of farmworkers; and Policy 3.10, encouraging housing design to meet the needs of large or multi-generational families.

Policies to reduce governmental or regulatory constraints on housing development include Policy 4.1 promoting ministerial approval of housing developments through objective development standards; Policy 4.3 encouraging utility providers to adequately serve housing of all income levels; and Policy 4.4 promoting innovative housing types, materials, and construction techniques that reduce costs.

Policies to provide fair housing and equal housing opportunities include policies such as Policy 5.3 to maintain programs that expand the range of affordable housing choices for minorities and lower-income households, and Policy 5.4 connecting residents, especially lower-income residents, to federal, State, and local programs that provide housing and related support services. Some Housing Element policies and programs could result in physical changes to the environment, such as construction of ADUs or rehabilitation of existing housing stock. However, none of the foregoing Housing Element policies and programs would result in development or other physical changes to the environment beyond what was previously identified in the EIR. The EIR analyzed physical environmental impacts from land use and infrastructure development under the General Plan, including the types of physical improvements resulting from the Housing Element. The EIR also identified the mitigation measures listed above to reduce the significant impacts of future development and infrastructure under General Plan implementation. The County would continue to implement the EIR mitigation measures, which would also reduce the potential impacts of the Housing Element.

Because the impacts resulting from the implementation of the Housing Element would not physically alter a scenic resource visible from a public viewing location; substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista that is visible from a public viewing location; create new sources of disability and discomfort glare for motorists traveling along a County RRN roadway or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to aesthetic, scenic resource, or light pollution. Mitigation measures are not required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
II. Agriculture and Forestry Resources			
Would the Housing Element:			
a) Result in loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance?	No	No	Yes
b) Result in Classified Farmland near any nonagricultural land use or project?	No	No	Yes
c) Conflict with Williamson Act contracts or Agricultural Preserves?	No	No	Yes
d) Conflict with land zoned as forest land, timberland, or Timberland Production Zone?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of Housing Element project changes as they relate to agriculture and forestry resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to agriculture and forestry resources. The impact analysis below includes discussion of each of these checklist questions.

4.2.1 Summary of General Plan EIR

The EIR addressed agriculture and forestry resources in Section 4.2. It identified a potentially significant impact pertaining to the loss of Important Farmland through future development allowed under the General Plan (Impact 4.2-1). The EIR included Mitigation Measures AG-1 and AG-2, which would reduce impacts to but not avoid loss of Important Farmland, and the impact was determined to be significant and unavoidable. Mitigation Measure AG-1 would require that discretionary development located on land identified as Important Farmland be conditioned to avoid direct loss of Important Farmland as much as feasibly possible and Mitigation Measure AG-2 would require discretionary development exceeding specified Important Farmland acreage loss thresholds to establish offsite agricultural conservation easements.

The EIR did not identify potentially significant impacts pertaining to nonagricultural land uses near Classified Farmland (Impact 4.2-2), conflicts with Williamson Act contracts or Agricultural Preserves (Impact 4.2-3), or conflicts with land zoned as forest land, timberland, or Timberland Production Zone (Impact 4.2-4).

4.2.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to agriculture or forestry resources impacts.

4.2.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to agriculture and forestry resources, have been identified during the preparation of this checklist.

4.2.4 Impact Analysis

Would the Housing Element:

- a) Result in loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance?
- b) Result in Classified Farmland near any nonagricultural land use or project?
- c) Conflict with Williamson Act contracts or Agricultural Preserves?
- d) Conflict with land zoned as forest land, timberland, or Timberland Production Zone?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not result in loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance; nonagricultural land uses near Classified Farmland; conflicts with Williamson Act contracts or Agricultural Preserves; or conflicts with land zoned as forest land, timberland, or Timberland Production Zone beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to agriculture or forestry resources. Mitigation measures are not required.

4.3 AIR QUALITY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
III. Air Quality			
Would the Housing Element:			
a) Conflict with or obstruct implementation of the 2016 Ventura County Air Quality Management Plan?	No	No	Yes
b) Cause construction-generated criteria air pollutant or precursor emissions to exceed VCAPCD-recommended thresholds?	No	No	Yes
c) Result in a net increase in long-term operational criteria air pollutant and precursor emissions that exceed VCAPCD-recommended thresholds?	No	No	Yes
d) Result in a short- or long-term increase in localized CO emissions that exceed VCAPCD-recommended thresholds?	No	No	Yes
e) Expose sensitive receptors to substantial increases in toxic air contaminant emissions?	No	No	Yes
f) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people)?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to air quality, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to air quality. The impact analysis below includes discussion of each of these checklist questions.

4.3.1 Summary of General Plan EIR

The EIR addressed air quality in Section 4.3. It identified potentially significant impacts related to construction-generated (Impact 4.3-2) and operational (Impact 4.3-3) air pollutant and precursor emissions in excess of the Ventura County Air Pollution Control District (VCAPCD)-recommended thresholds from implementation of the General Plan. Mitigation Measures AQ-1a and AQ-1b regarding requirements for construction best management practices (BMPs) and equipment, Mitigation Measures AQ-2a and AQ-2b regarding requirements for dust reduction measures and BMPs for fugitive dust emissions, and Mitigation Measure AQ-3 requiring setbacks, preparation of Health Risk Assessments, and/or design measures to reduce the level of exposure to concentrations of toxic air contaminants (TACs) would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

The EIR also identified a potentially significant impact from the exposure of sensitive receptors to substantial increases in TAC emissions (Impact 4.3-5) and concluded that implementation of Mitigation Measure AQ-3 would reduce the impact to less than significant.

The EIR did not identify potentially significant impacts related to conflicts with implementation of the 2016 Ventura County Air Quality Management Plan (Impact 4.3-1), localized CO emissions in excess of VCAPCD-recommended thresholds (Impact 4.3-4), or other emissions such as those leading to odors adversely affecting a substantial number of people (Impact 4.3-6).

4.3.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to air quality impacts.

4.3.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to air quality, have been identified during the preparation of this checklist.

4.3.4 Impact Analysis

Would the Housing Element:

- a) Conflict with or obstruct implementation of the 2016 Ventura County Air Quality Management Plan?
- b) Cause construction-generated criteria air pollutant or precursor emissions to exceed VCAPCD-recommended thresholds?
- c) Result in a net increase in long-term operational criteria air pollutant and precursor emissions that exceed VCAPCD-recommended thresholds?
- d) Result in a short- or long-term increase in localized CO emissions that exceed VCAPCD-recommended thresholds?
- e) Expose sensitive receptors to substantial increases in toxic air contaminant emissions?
- f) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not conflict with or obstruct implementation of the 2016 Ventura County Air Quality Management Plan; cause construction-generated or long-term operational air pollutant emissions, including localized CO emissions, to exceed VCAPCD-recommended thresholds; expose sensitive receptors to substantial increases in toxic air contaminant emissions; or result in other emissions, such as those leading to odors, that could adversely affect a substantial number of people beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to air quality. Mitigation measures are not required.

4.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
IV. Biological Resources			
Would the Housing Element:			
a) Disturb or result in the loss of special-status species and habitat?	No	No	Yes
b) Disturb or result in loss of riparian habitat, sensitive plant communities, environmentally sensitive habitat areas (ESHA), coastal beaches, sand dunes, and other sensitive natural communities?	No	No	Yes
c) Disturb or result in loss of wetlands and other waters?	No	No	Yes
d) Interfere with resident or migratory wildlife corridors or native wildlife nursery sites?	No	No	Yes
e) Conflict with any local policies or ordinances protecting biological resources?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to biological resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to biological resources. The impact analysis below includes discussion of each of these checklist questions.

4.4.1 Summary of General Plan EIR

The EIR addressed biological resources in Section 4.4. It identified potentially significant impacts due to the disturbance or loss of special status species or habitat (Impact 4.4-1); disturbance or loss of riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, and other sensitive natural communities (Impact 4.4-2); disturbance or loss of wetlands or other waters (Impact 4.4-3); and interference with resident or migratory wildlife corridors or native wildlife nursery sites (Impact 4.4-4). The EIR included Mitigation Measure BIO-1 establishing methodology and requirements to identify, avoid, and mitigate for impacts to sensitive biological resources, which would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

The EIR did not identify a potentially significant impact related to conflicts with local policies or ordinances protecting biological resources (Impact 4.4-5).

4.4.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to biological resources.

4.4.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to biological resources, have been identified during the preparation of this checklist.

4.4.4 Impact Analysis

Would the Housing Element:

- a) Disturb or result in the loss of special-status species and habitat?
- b) Disturb or result in loss of riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, and other sensitive natural communities?
- c) Disturb or result in loss of wetlands and other waters?
- d) Interfere with resident or migratory wildlife corridors or native wildlife nursery sites
- e) Conflict with any local policies or ordinances protecting biological resources?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not disturb or cause the loss of special-status species or habitat; result in the loss or disturbance of riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, or other sensitive natural communities; disturb or result in the loss of wetlands or other waters; interfere with resident or migratory wildlife corridors or native wildlife nursery sites; or conflict with any local policy or ordinance protecting biological resources beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related biological resources. Mitigation measures are not required.

4.5 CULTURAL, TRIBAL CULTURAL, AND PALEONTOLOGICAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
V. Cultural, Tribal Cultural, and Paleontological Resources			
Would the Housing Element:			
a) Result in substantial adverse change in the significance of an archaeological resource pursuant to Section 5024.1(g) of the Public Resources Code and CEQA?	No	No	Yes
b) Result in substantial adverse change in the significance of a historical resource pursuant to Section 5024.1(g) of the Public Resources Code and CEQA?	No	No	Yes
c) Result in substantial adverse change in the significance of a tribal cultural resources?	No	No	Yes
d) Result in grading and excavation of fossiliferous rock or increase access opportunities and unauthorized collection of fossil materials from valuable sites?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to cultural, tribal cultural, and paleontological resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to cultural, tribal cultural, and paleontological resources. The impact analysis below includes discussion of each of these checklist questions.

4.5.1 Summary of General Plan EIR

The EIR addressed cultural, tribal cultural, and paleontological resources in Section 4.5. It identified potentially significant impacts due to substantial adverse changes in the significance of an archaeological resource (Impact 4.5-1) resulting from implementation of the General Plan. The EIR included Mitigation Measures CUL-1a, 1b, and 1c requiring protection of existing resources, avoidance when feasible, and mitigation measures to reduce impacts, which would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable.

The EIR also identified potentially significant impacts due to substantial adverse changes in the significance of historic resources (Impact 4.5-2) and tribal cultural resources (Impact 4.5-3). The EIR included Mitigation Measures CUL-1a, 1b, and 1c, Mitigation Measures CUL-2 and CUL-3 requiring the identification of listed, eligible, or unevaluated sites in coordination with the Cultural Heritage Board and protection of historic resources, and Mitigation Measures CUL-4 and CUL-5 protecting historic and tribal cultural resources, which would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

The EIR also identified grading and excavation of known fossiliferous rock and increased access opportunities to paleontologically sensitive areas resulting in the unauthorized collection of fossil materials as a potentially significant impact (Impact 4.5-4). The EIR included Mitigation Measures CUL-1a, CUL-1b, CUL-1c, CUL-2, CUL-3, CUL-4, CUL-5, which are described above, and CUL-6 requiring implementation of project-level security measures, which would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

4.5.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to cultural, tribal cultural, and paleontological resources impacts.

4.5.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to cultural, tribal cultural, or paleontological resources have been identified during the preparation of this checklist.

4.5.4 Impact Analysis

Would the Housing Element:

- a) Result in substantial adverse change in the significance of an archaeological resource pursuant to Section 5024.1(g) of the Public Resources Code and CEQA?
- b) Result in substantial adverse change in the significance of a historical resource pursuant to Section 5024.1(g) of the Public Resources Code and CEQA?
- c) Result in substantial adverse change in the significance of a tribal cultural resources?
- d) Result in grading and excavation of fossiliferous rock or increase access opportunities and unauthorized collection of fossil materials from valuable sites?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not result in substantial adverse changes in the significance of an archaeological resource, historic resource, or tribal cultural resources, or result in grading or excavation of fossiliferous rock or increase access opportunities and unauthorized collection of fossil materials from valuable sites beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to cultural, tribal cultural, or paleontological resources. Mitigation measures are not required.

4.6 ENERGY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
VI. Energy			
Would the Housing Element:			
a) Result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or impede State or local plans for renewable energy or energy efficiency?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to energy, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to energy. The impact analysis below includes discussion of the checklist question.

4.6.1 Summary of General Plan EIR

The EIR addressed energy in Section 4.6. It did not identify a potentially significant impact for wasteful, inefficient, or unnecessary consumption of energy resources or for conflicts with State or local plans for renewable energy or energy efficiency (Impact 4.6-1).

4.6.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to energy impacts.

4.6.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to energy resources have been identified during the preparation of this checklist.

4.6.4 Impact Analysis

Would the Housing Element:

- a) Result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or impede State or local plans for renewable energy or energy efficiency?
- Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County’s housing allocation.

As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not result in wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or impede the implementation of local or State plans for renewable energy or energy efficiency beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to energy resources. Mitigation measures are not required.

4.7 Geologic Hazards

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
VII. Geologic Hazards			
Would the Housing Element:			
a) Result in development within a State of California—designated Earthquake Fault Zone or a County—designated Fault Hazard Area that exposes people or structures to fault rupture hazards or directly or indirectly cause fault rupture?	No	No	Yes
b) Have potential to expose people or structures to the risk of loss, injury, or death involving ground-shaking hazards?	No	No	Yes
c) Result in development within a State of California Seismic Hazards Zone that exposes people or structures to liquefaction hazards or directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving liquefaction?	No	No	Yes
d) Result in development that exposes people or structures to landslide or debris flow hazards as a result of mapped landslides, potential earthquake-induced landslide zones, and geomorphology of hillside terrain or directly or indirectly cause landslides?	No	No	Yes
e) Result in development that exposes people or structures to the risk of loss, injury, or death involving soil expansion or directly or indirectly cause soil expansion if development is located within an expansive soils hazard zone or where soils with an expansion index greater than 20 is present?	No	No	Yes
f) Result in development that exposes people or structures to the risk of loss, injury, or death involving subsidence or directly or indirectly cause subsidence if development is located within a subsidence hazard zone?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to geologic hazards, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to geologic hazards. The impact analysis below includes discussion of each of these checklist questions.

4.7.1 Summary of General Plan EIR

The EIR addressed geologic hazards in Section 4.7. The EIR did not identify potentially significant impacts due to development that exposes people or structures to fault rupture hazards or causes fault rupture (Impact 4.7-1); exposure of people or structures to risk of loss, injury, or death involving ground-shaking hazards (Impact 4.7-2); or development that exposes people or structures to liquefaction, landslide, debris flow, or subsidence hazards or causes adverse effects involving these hazards (Impacts 4.7-3, 4.7-4, 4.7-5; and 4.7-6).

4.7.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to geologic hazards impacts.

4.7.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to geologic hazards, have been identified during the preparation of this checklist.

4.7.4 Impact Analysis

Would the Housing Element:

- a) Result in development within a State of California-designated Earthquake Fault Zone or a County-designated Fault Hazard Area that exposes people or structures to fault rupture hazards or directly or indirectly cause fault rupture?
- b) Have potential to expose people or structures to the risk of loss, injury, or death involving ground-shaking hazards?
- c) Result in development within a State of California Seismic Hazards Zone that exposes people or structures to liquefaction hazards or directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving liquefaction?
- d) Result in development that exposes people or structures to landslide or debris flow hazards as a result of mapped landslides, potential earthquake-induced landslide zones, and geomorphology of hillside terrain or directly or indirectly cause landslides?
- e) Result in development that exposes people or structures to the risk of loss, injury, or death involving soil expansion or directly or indirectly cause soil expansion if development is located within an expansive soils hazard zone or where soils with an expansion index greater than 20 is present?
- f) Result in development that exposes people or structures to the risk of loss, injury, or death involving subsidence or directly or indirectly cause subsidence if development is located within a subsidence hazard zone?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not expose people or structures to fault rupture hazards or cause fault rupture, risk of loss, injury, or death involving ground-shaking hazards, or result in liquefaction, landslide, debris flow, or subsidence hazards or cause adverse effects involving these hazards beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to geologic hazards. Mitigation measures are not required.

4.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
VIII. Greenhouse Gas Emissions			
Would the Housing Element:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No	No	Yes
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to greenhouse gas (GHG) emissions, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to GHG emissions. The impact analysis below includes discussion of each of these checklist questions.

4.8.1 Summary of General Plan EIR

The EIR addressed GHG emissions in Section 4.8. It identified potentially significant impact due to the generation of GHG emissions that may have a significant environmental impact (Impact 4.8-1) and conflicts with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions (Impact 4.8-2). The EIR included Mitigation Measures GHG-1, GHG-2, GHG-3, GHG-4, CTM-1, CTM-2, and CTM-3 requiring actions to reduce energy use in buildings, establish a GHG Reduction Policy Enhancement Program and reduce the rate of vehicle miles traveled (VMT), which would lessen but not avoid these significant impacts. Therefore, these impacts were determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

4.8.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to GHG emissions impacts.

4.8.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to GHG emissions, have been identified during the preparation of this checklist.

4.8.4 Impact Analysis

Would the Housing Element:

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

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not generate GHG emissions that have a significant impact on the environment or conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to GHG emissions. Mitigation measures are not required.

4.9 HAZARDS, HAZARDOUS MATERIALS, AND WILDFIRE

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
IX. Hazards, Hazardous Materials, and Wildfire			
Would the Housing Element:			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or hazardous waste?	No	No	Yes
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials or hazardous waste into the environment?	No	No	Yes
c) Emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing or proposed school?	No	No	Yes
d) Create a significant hazard due to location on a site which is included on a list of hazardous materials sites?	No	No	Yes
e) Locate inconsistent land uses within the sphere of influence of any airport, or otherwise result in a safety hazard for people residing or working near an airport?	No	No	Yes
f) Expose people to risk of wildfire by locating development in a High Fire Hazard Area/Fire Hazard Severity Zone or substantially impairing an adopted emergency response plan or evacuation plan or exacerbate wildfire risk?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, as summary of project changes as they relate to hazards, hazardous materials, and wildfire, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to hazards, hazardous materials, and wildfire. The impact analysis below includes discussion of each of these checklist questions.

4.9.1 Summary of General Plan EIR

The EIR addressed hazards, hazardous materials, and wildfire in Section 4.9. It identified a potentially significant impact due to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, and development that exacerbates the potential for wildfires to occur and the resulting adverse environmental effects associated with wildfires (Impact 4.9-6). The EIR concluded that no additional feasible mitigation for this potentially impact was available beyond the policies and programs of the General Plan. Therefore, it determined this impact was significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

The EIR did not identify potentially significant impacts related to the creation of significant hazards to the public or the environment through: routine transport, use, or disposal of hazardous materials or hazardous wastes (Impact 4.9-1); reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials or hazardous waste into the environment (Impact 4.9-2); or location of development on a site included on a list of hazardous materials sites (Impact 4.9-4). It also did not identify potentially significant impacts related to hazardous emissions or handling hazardous materials within 0.25 mile of an existing or proposed school (Impact 4.9-3) or from locating inconsistent land uses within the sphere of influence of any airport or otherwise resulting in a safety hazard for people residing or working near an airport (Impact 4.9-5).

4.9.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to hazards, hazardous materials, and wildfire impacts.

4.9.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to hazards, hazardous materials, and wildfire, have been identified during the preparation of this checklist.

4.9.4 Impact Analysis

Would the Housing Element:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or hazardous waste?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials or hazardous waste into the environment?
- c) Emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing or proposed school?
- d) Create a significant hazard due to location on a site which is included on a list of hazardous materials sites?
- e) Locate inconsistent land uses within the sphere of influence of any airport, or otherwise result in a safety hazard for people residing or working near an airport?
- f) Expose people to risk of wildfire by locating development in a High Fire Hazard Area/Fire Hazard Severity Zone or substantially impairing an adopted emergency response plan or evacuation plan or exacerbate wildfire risk?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not create significant hazards to the public or the environment through routine transport, use, or disposal of hazardous materials or hazardous wastes, reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials or hazardous waste into the environment, or location of development on a site included on a list of hazardous materials sites, or hazardous emissions or handling of hazardous materials within 0.25 mile of an existing or proposed school, or would not locate inconsistent land uses within the sphere of influence of any airport or otherwise result in a safety hazard for people residing or working near an airport, and would not expose people or structures to risk of loss, injury, or death involving wildland fires, or exacerbate wildfire risk beyond what was previously identified in the EIR, the Housing Element would not result in any new significant impacts or a substantial increase in the severity of significant impacts related hazards, hazardous materials, and wildfire. Mitigation measures are not required.

4.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
X. Hydrology and Water Quality			
Would the Housing Element:			
a) Directly or indirectly decrease the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin?	No	No	Yes
b) Result in net groundwater extraction that causes overdraft in groundwater basins that are not overdrafted or are not in hydrologic continuity with an overdrafted basin?	No	No	Yes
c) Result in any increase in groundwater extraction in areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells?	No	No	Yes
d) Degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the applicable Basin Plan?	No	No	Yes
e) Result in the use of groundwater, in any capacity, and would be located within 2 miles of the boundary of a site with documented groundwater contamination associated with a former or current test site for rocket engines?	No	No	Yes
f) Increase surface water consumptive use (demand) in a fully appropriated stream reach, as designated by the State Water Resources Control Board, or where unappropriated surface water is unavailable?	No	No	Yes

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
g) Increase surface water consumptive use (demand) including diversion or dewatering downstream reaches, resulting in an adverse impact to one or more of the beneficial uses listed in the applicable Basin Plan?	No	No	Yes
h) Degrade the quality of surface water, causing it to exceed the water quality objectives of the applicable Basin Plan?	No	No	Yes
i) Cause stormwater quality to exceed water quality objectives or standards in the applicable MS4 permit or any other NPDES Permits?	No	No	Yes
j) Be located within 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir, resulting in a seiche hazard?	No	No	Yes
k) Be located in a mapped area of a tsunami hazard?			
l) Be located in a mapped area of flood hazards?			
m) Result in erosion, siltation, or flooding hazards?	No	No	Yes
n) Impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk of flood hazards?	No	No	Yes
o) Result in conflicts with the Ventura County Watershed Protection District's Comprehensive Plan through potential deposition of sediment and debris materials within existing channels and allied obstruction of flow; overflow of	No	No	Yes

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
channels during design storm conditions; and increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on- and off-site, for projects not located within the Ventura County Watershed Protection District's Comprehensive Plan?			
p) Result in noncompliance with building design and construction standards regulating flow to and from natural and man-made drainage channels?	No	No	Yes
q) Be designed to meet all applicable requirements for onsite wastewater treatment systems (OWTS)?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to hydrology and water quality, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to hydrology and water quality. The impact analysis below includes discussion of each of these checklist questions.

4.10.1 Summary of General Plan EIR

The EIR addressed hydrology and water quality in Section 4.10. It did not identify potentially significant impacts related to decreasing groundwater quantity or increasing groundwater extraction in groundwater basins (Impacts 4.10-1, 4.10-2, and 4.10-3); degrading groundwater quality and exceeding groundwater quality objectives (Impact 4.10-4); using groundwater within 2 miles of former or current rocket engine test sites (Impact 4.10-5); increasing demand for surface water in a fully appropriated stream reach or where unappropriated surface water is unavailable (Impact 4.10-6); resulting in an adverse impact to Basin Plan beneficial uses when increasing demand for surface water (Impact 4.10-7); degrading surface water quality to the extent that Basin Plan water quality objectives are exceeded (Impact 4.10-8); exceeding stormwater quality objectives or standards of applicable municipal separate storm sewer system (MS4) permits or other National Pollutant Discharge Elimination System (NPDES) permits (Impact 4.10-9); locating development in an area with seiche, tsunami, or flood hazards (Impacts 4.10-10, 4.10-11, and 4.10-13); causing erosion, siltation, or flooding hazards (Impact 4.10-12); increasing flood hazard risks by obstructing, impairing, diverting, impeding, or altering water flow characteristics (Impact 4.10-14); depositing sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, or increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels (Impact 4.10-15); violating standards regulating flow to and from natural and man-made drainages (Impact 4.10-16); or noncompliance with requirements for onsite wastewater treatment systems (Impact 4.10-17).

4.10.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to hydrology and water quality impacts.

4.10.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to hydrology and water quality, have been identified during the preparation of this checklist.

4.10.4 Impact Analysis

Would the Housing Element:

- a) Directly or indirectly decrease the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin?
- b) Result in net groundwater extraction that causes overdraft in groundwater basins that are not overdrafted or are not in hydrologic continuity with an overdrafted basin?
- c) Result in any increase in groundwater extraction in areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells?
- d) Degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the applicable Basin Plan?
- e) Result in the use of groundwater, in any capacity, and would be located within 2 miles of the boundary of a site with documented groundwater contamination associated with a former or current test site for rocket engines?
- f) Increase surface water consumptive use (demand) in a fully appropriated stream reach, as designated by the State Water Resources Control Board, or where unappropriated surface water is unavailable?
- g) Increase surface water consumptive use (demand) including diversion or dewatering downstream reaches, resulting in an adverse impact to one or more of the beneficial uses listed in the applicable Basin Plan?
- h) Degrade the quality of surface water, causing it to exceed the water quality objectives of the applicable Basin Plan?
- i) Cause stormwater quality to exceed water quality objectives or standards in the applicable MS4 permit or any other NPDES Permits?
- j) Be located within 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir, resulting in a seiche hazard?

- k) Be located in a mapped area of a tsunami hazard?
- l) Be located in a mapped area of flood hazards?
- m) Result in erosion, siltation, or flooding hazards?
- n) Impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk of flood hazards?
- o) Result in conflicts with the Ventura County Watershed Protection District's Comprehensive Plan through potential deposition of sediment and debris materials within existing channels and allied obstruction of flow; overflow of channels during design storm conditions; and increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on- and off-site, for projects not located within the Ventura County Watershed Protection District's Comprehensive Plan?
- p) Result in noncompliance with building design and construction standards regulating flow to and from natural and man-made drainage channels?
- q) Be designed to meet all applicable requirements for onsite wastewater treatment systems (OWTS)?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not decrease groundwater quantity or increase groundwater extraction in groundwater basins degrade groundwater quality and exceed groundwater quality objectives; use groundwater within 2 miles of former or current rocket engine test sites; increase demand for surface water in a fully appropriated stream reach or where unappropriated surface water is unavailable; result in an adverse impact to Basin Plan beneficial uses when increasing demand for surface water; degrade surface water quality to the extent that Basin Plan water quality objectives are exceeded; exceed stormwater quality objectives or standards of applicable municipal separate storm sewer system (MS4) permits or other National Pollutant Discharge Elimination System (NPDES) permits; locate development in an area with seiche, tsunami, or flood hazards; cause erosion, siltation, or flooding hazards; increase flood hazard risks by obstructing, impairing, diverting, impeding, or altering water flow characteristics; deposit sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, or increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels; violate standards regulating flow to and from natural and man-made drainage; or not comply with requirements for onsite wastewater treatment systems beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to hydrology or water quality. Mitigation measures are not required.

4.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XI. Land Use and Planning			
Would the Housing Element:			
a) Result in physical development that is incompatible with land uses, architectural form or style, site design/layout, or density/parcel sizes within existing communities?	No	No	Yes
b) Result in physical development that would divide an established community?	No	No	Yes
c) Cause an environmental impact due to a conflict with a regional plan, policy, or program?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to land use and planning, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to land use and planning. The impact analysis below includes discussion of each of these checklist questions.

4.11.1 Summary of General Plan EIR

The EIR addressed land use and planning impacts in Section 4.11. It did not identify potentially significant impacts related to physical development that may be incompatible with existing land uses, architectural form or style, site design, or density of existing communities (Impact 4.11-1); physically dividing established communities (Impact 4.11-2); or environmental impacts that result from conflicts with a regional plan, policy, or program (Impact 4.11-3).

4.11.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to land use and planning impacts.

4.11.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to land use and planning, have been identified during the preparation of this checklist.

4.11.4 Impact Analysis

Would the Housing Element:

- a) Result in physical development that is incompatible with land uses, architectural form or style, site design/layout, or density/parcel sizes within existing communities?
- b) Result in physical development that would divide an established community?
- c) Cause an environmental impact due to a conflict with a regional plan, policy, or program?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not result in physical development that is incompatible with architectural forms and styles, parcel density, physical division of an established community, or an environmental impact due to conflict with a regional plan, policy, or program beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to land use and planning. Mitigation measures are not required.

4.12 MINERAL AND PETROLEUM RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XII. Mineral and Petroleum Resources			
Would the Housing Element:			
a) Result in development on or adjacent to existing mineral resources extraction sites or areas where mineral resources are zoned, mapped, or permitted for extraction, which could hamper or preclude extraction of the resources?	No	No	Yes
b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	No	No	Yes
c) Result in development on or adjacent to existing petroleum extraction sites or areas where petroleum resources are zoned, mapped, or permitted for extraction, which could hamper or preclude access to the resources?	No	No	Yes
d) Result in the loss of availability of a known petroleum resource that would be of value to the region and the residents of the State?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to mineral and petroleum resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to mineral and petroleum resources. The impact analysis below includes discussion of each of these checklist questions.

4.12.1 Summary of General Plan EIR

The EIR addressed mineral and petroleum resources in Section 4.12. It identified potentially significant impacts related to increased setback requirements for new oil and gas wells that could hamper or preclude expansion of existing oil and gas operations and drilling of new discretionary wells (Impact 4.12-3) and loss of availability of known petroleum resources of value to the region and the State because of General Plan policies mandating infrastructure that may be technologically or economically infeasible for oil and gas operators to install (Impact 4.12-4).

The EIR included Mitigation Measures PR-1, PR-2, and PR-3 to reduce these impacts, but the County found that specific economic, legal, social, technological, or other considerations would make infeasible any mitigation, including Mitigation Measures PR-1, PR-2, and PR-3, and the impacts were therefore determined to be significant and unavoidable. As a result, the Board adopted a Statement of Overriding Considerations.

The EIR did not identify potentially significant impacts related to hampering or precluding access to mineral resources (Impact 4.12-1) or loss of availability of a known mineral resource of value to the region and residents of the State (Impact 4.12-2).

4.12.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to mineral and petroleum resources impacts.

4.12.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to mineral and petroleum resources, have been identified during the preparation of this checklist.

4.12.4 Impact Analysis

Would the Housing Element:

- a) Result in development on or adjacent to existing mineral resources extraction sites or areas where mineral resources are zoned, mapped, or permitted for extraction, which could hamper or preclude extraction of the resources?
- b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?
- c) Result in development on or adjacent to existing petroleum extraction sites or areas where petroleum resources are zoned, mapped, or permitted for extraction, which could hamper or preclude access to the resources?
- d) Result in the loss of availability of a known petroleum resource that would be of value to the region and the residents of the State?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not result in hampering or precluding expansion of existing oil and gas operations and drilling of new discretionary wells, loss of availability of known petroleum resources of value to the region and the State, hampering or precluding access to mineral resources, or loss of availability of a known mineral resource of value to the region and residents of the State beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to mineral and petroleum resources. Mitigation measures are not required.

4.13 NOISE AND VIBRATION

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XIII. Noise and Vibration			
Would the Housing Element:			
a) Expose sensitive receptors to construction noise levels that exceed applicable standards?	No	No	Yes
b) Expose sensitive land uses to traffic noise?	No	No	Yes
c) Expose existing sensitive receptors to traffic-noise increases?	No	No	Yes
d) Expose noise-sensitive land uses to operational stationary noise that exceeds applicable standards?	No	No	Yes
e) Expose noise-sensitive land uses to airport noise that exceeds the standards in the Ventura County Airport Comprehensive Land Use Plan?	No	No	Yes
f) Expose sensitive receptors to construction vibration levels that exceed applicable standards?	No	No	Yes
g) Expose noise-sensitive land uses to railroad noise and vibration that exceeds applicable standards?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to noise and vibration, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to noise and vibration. The impact analysis below includes discussion of each of these checklist questions.

4.13.1 Summary of General Plan EIR

The EIR addressed noise and vibration in Section 4.13. It identified potentially significant impacts for exposure of sensitive receptors to traffic noise level increases caused by General Plan implementation (Impact 4.13-3) and construction vibration levels that would exceed applicable standards (Impact 4.13-6).

The EIR included Mitigation Measure NOI-1 requiring implementation of noise control measures in specified circumstances, which would lessen, but not avoid the significant traffic noise impact. Therefore, this impact was determined to be significant and unavoidable. The EIR also included Mitigation Measure NOI-2 requiring noise compatibility review for discretionary development and Mitigation Measure NOI-3 requiring revisions to the County Construction Noise Threshold Criteria and Control Plan to include standards for vibration, which would lessen but not avoid the significant construction vibration impact. Therefore, this impact was also determined to be significant and unavoidable. As a result, the Board adopted a Statement of Overriding Considerations.

The EIR did not identify potentially significant impacts related to exposure of sensitive receptors to construction noise levels that exceed applicable standards (Impact 4.13-1); exposure of new sensitive land uses to traffic noise (Impact 4.13-2), operational stationary noise (Impact 4.13-4), airport noise (Impact 4.13-5), or railroad noise and vibration (Impact 4.13-7) that exceeds applicable standards.

4.13.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to noise and vibration impacts.

4.13.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to noise and vibration, have been identified during the preparation of this checklist.

4.13.4 Impact Analysis

Would the Housing Element:

- a) Expose sensitive receptors to construction noise levels that exceed applicable standards?
- b) Expose sensitive land uses to traffic noise?
- c) Expose existing sensitive receptors to traffic-noise increases?
- d) Expose noise-sensitive land uses to operational stationary noise that exceeds applicable standards?
- e) Expose noise-sensitive land uses to airport noise that exceeds the standards in the Ventura County Airport Comprehensive Land Use Plan?
- f) Expose sensitive receptors to construction vibration levels that exceed applicable standards?
- g) Expose noise-sensitive land uses to railroad noise and vibration that exceeds applicable standards?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not result in exposure of sensitive receptors to construction noise levels, traffic noise level increases, or construction vibration levels that would exceed applicable standards, or exposure of new sensitive land uses to traffic noise, operational stationary noise, airport noise, or railroad noise and vibration that exceeds applicable standards beyond what was previously identified in the EIR the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to noise and vibration. Mitigation measures are not required.

4.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XVI. Population and Housing			
Would the Housing Element:			
a) Eliminate three or more existing affordable housing units or displace substantial numbers of people or housing units?	No	No	Yes
b) Induce substantial unplanned population growth?	No	No	Yes
c) Result in low-income employment opportunities that could generate demand for new housing that exceeds the County's inventory of land to develop low-income housing?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to population and housing, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to population and housing. The impact analysis below includes discussion of each of these checklist questions.

4.14.1 Summary of General Plan EIR

The EIR addressed population and housing in Section 4.13. The EIR did not identify potentially significant impacts related to elimination of three or more affordable housing units or displacement of substantial numbers of people or housing units (Impact 4.14-1); inducing substantial unplanned population growth (Impact 4.14-2); or generation of low income jobs that could generate demand for housing in excess of the County's inventory of land for low-income housing (Impact 4.14-3).

4.14.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to population and housing impacts.

4.14.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related population and housing, have been identified during the preparation of this checklist.

4.14.4 Impact Analysis

Would the Housing Element:

- a) Eliminate three or more existing affordable housing units or displace substantial numbers of people or housing units?
- b) Induce substantial unplanned population growth?
- c) Result in low-income employment opportunities that could generate demand for new housing that exceeds the County's inventory of land to develop low-income housing?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not eliminate three or more affordable housing units, displace substantial numbers of people or housing units, induce unplanned population growth, or generate low-income employment demand for housing that could exceed the County's inventory of land for low-income housing beyond what was previously identified in the EIR the Housing Element would not result in any new significant impacts or a substantial increase in the severity of significant impacts related to population and housing. Mitigation measures are not required.

4.15 PUBLIC SERVICES AND RECREATION

Environmental Issue Area	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XV. Public Services and Recreation			
Would the Housing Element:			
a) Increase demand for law enforcement and emergency services as a result of inadequate security measures?	No	No	Yes
b) Require expansion or construction of new facilities to support law enforcement and emergency services?	No	No	Yes
c) Require expansion or new construction of new fire protection facilities and services as a result of excessive response times, project magnitude, or distance from existing facilities?	No	No	Yes
d) Require expansion of construction of new public libraries or other facilities to meet new demand or address overcrowding and accessibility?	No	No	Yes
e) Require expansion or construction of new parks and recreation facilities and services or cause substantial physical deterioration of parks and recreation facilities because of overuse?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate public services and recreation, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to public services and recreation. The impact analysis below includes discussion of each of these checklist questions.

4.15.1 Summary of General Plan EIR

The EIR addressed public services and recreation in Section 4.15. It identified potentially significant impacts related to increases in demand for public services, including for law enforcement, emergency services, fire protection, libraries and other facilities, and parks and recreation facilities, that could result in construction of new or expanded facilities that have adverse effects on the environment (Impact 4.15-1 to 4.15-5). The EIR included Mitigation Measure PS-1 requiring that future projects incorporate law enforcement security measures, which would reduce demand for law enforcement services caused by inadequate security measures. Therefore, Impact 4.15-1 was determined to be less than significant with mitigation.

Regarding the remaining potentially significant impacts, the EIR explained that the construction of new or expanded public services and recreation facilities that could result adverse physical changes to the environment was already evaluated and identified throughout the other sections of the EIR. Where impacts were potentially significant, the EIR identified potentially feasible mitigation measures to avoid or substantially lessen the impacts. As a result, no additional mitigation measures were identified in Section 4.15 of the EIR to address the potentially significant impacts of constructing new or expanded public services or recreation facilities.

4.15.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to public services and recreation impacts.

4.15.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related population and housing, have been identified during the preparation of this checklist.

4.15.4 Impact Analysis

Would the Housing Element:

- a) Increase demand for law enforcement and emergency services as a result of inadequate security measures?
- b) Require expansion or construction of new facilities to support law enforcement and emergency services?
- c) Require expansion or new construction of new fire protection facilities and services as a result of excessive response times, project magnitude, or distance from existing facilities?
- d) Require expansion or construction of new public libraries or other facilities to meet new demand or address overcrowding and accessibility?
- e) Require expansion or construction of new parks and recreation facilities and services or cause substantial physical deterioration of parks and recreation facilities because of overuse?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not increase demand for public services, including for law enforcement, emergency services, fire protection, libraries and other facilities, and parks and recreation facilities, that could in turn result in construction of new or expanded facilities that have adverse effects on the environment beyond what was previously identified in the EIR, the Housing Element will not result in any new significant impacts or a substantial increase in the severity of significant impacts related to population and housing. Mitigation measures are not required.

4.16 TRANSPORTATION AND TRAFFIC

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XVI. Transportation and Traffic			
Would the Housing Element:			
a) Exceed VMT thresholds?	No	No	Yes
b) Result in adverse effects related to County road standards and safety?	No	No	Yes
c) Result in inadequate emergency access?	No	No	Yes
d) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	No	No	Yes
e) Substantially interfere with railroad facility integrity and/or operations?	No	No	Yes
f) Substantially interfere with or compromise the operations or integrity of an existing pipeline?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to transportation and traffic, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to transportation and traffic. The impact analysis below includes discussion of each of these checklist questions.

4.16.1 Summary of General Plan EIR

The EIR addressed transportation and traffic impacts in Section 4.16. It identified a potentially significant impact due to rates of VMT that would exceed applicable thresholds (Impact 4.16-1). The EIR included Mitigation Measures CTM-1, CTM-2, and CTM-3 requiring new guidelines and development of a VMT Reduction Program, which would lessen but not avoid this significant impact. Therefore, this impact was determined to be significant and unavoidable.

The EIR also identified a potentially significant impact due to the addition of new vehicle trips along roadway facilities with collision or incident rates above specified safety levels (Impact 4.16-2). The EIR included Mitigation Measure CTM-4 requiring the County to update its Traffic Fee Mitigation Program to collect fair-share fees from development to improve roadway safety, which would lessen but not avoid this significant impact. Therefore, this impact was determined to be significant and unavoidable and a Statement of Overriding Considerations was adopted by the Board.

The EIR identified a potentially significant impact due to inadequate emergency access and responses caused by increases in demand including vehicle trips on the County's existing transportation system (Impact 4.16-3). The EIR included Mitigation Measures CTM-5 and CTM-6 requiring the County to ensure adequacy of emergency access is maintained prior to discretionary project approvals and through implementation of transportation capital improvements that ensure adequate emergency access is provided, which would lessen but not avoid this significant impact. Therefore, this impact was determined to be significant and unavoidable, and a Statement of Overriding Considerations was adopted by the Board.

The EIR also identified a potentially significant impact due to new development that results in substantial interference with existing railroad facility integrity or operations (Impact 4.16-5). The EIR included Mitigation Measure CTM-7 requiring the County to ensure substantial interference with railroad facility integration or operations is avoided prior to discretionary project approvals, which would reduce this impact to less than significant.

The EIR did not identify potentially significant impacts related to conflicts with adopted policies, plans, or programs for public transit, bicycle, or pedestrian facilities, or decreases in the performance or safety of such facilities (Impact 4.16-4) or causing substantial interference with or compromising the operation or integrity of an existing pipeline (Impact 4.16-6).

4.16.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to transportation and traffic impacts.

4.16.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to transportation and traffic, have been identified during the preparation of this checklist.

4.16.4 Impact Analysis

Would the Housing Element:

- a) Exceed VMT thresholds?
- b) Result in adverse effects related to County road standards and safety?
- c) Result in inadequate emergency access?
- d) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
- e) Substantially interfere with railroad facility integrity and/or operations?
- f) Substantially interfere with or compromise the operations or integrity of an existing pipeline?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element will not exceed applicable VMT thresholds, add new vehicle trips along roadway facilities with collision or incident rates above specified safety levels, result in inadequate emergency access and responses, substantially interfere with existing railroad facility integrity or operations, conflict with adopted policies, plans, or programs for public transit, bicycle, or pedestrian facilities, or decrease in the performance or safety of such facilities, or cause substantial interference with or compromise the operation or integrity of an existing pipeline beyond what was previously identified in the EIR, the Housing Element would not result in any new significant impacts or a substantial increase in the severity of significant impacts related to transportation and traffic. Mitigation measures are not required.

4.17 UTILITIES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XVII. Utilities and Service Systems			
Would the Housing Element:			
a) Cause a disruption or rerouting of an existing utility facility?	No	No	Yes
b) Increase demand on a utility that results in the relocation or construction of new, or expansion of existing water, wastewater, electric power, natural gas, or telecommunications infrastructure, resulting in the potential for significant environmental impacts?	No	No	Yes
c) Result in inadequate wastewater treatment capacity to serve future demand, in addition to the provider's existing commitments?	No	No	Yes
d) Result in development that would adversely affect water supply quantities during normal, single-dry, and multiple-dry years?	No	No	Yes
e) Result in a direct or indirect adverse effect on a landfill's disposal capacity, such that it reduces its useful life to less than 15 years?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the EIR, a summary of project changes as they relate to utilities, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to utilities. The impact analysis below includes discussion of each of these checklist questions.

4.17.1 Summary of General Plan EIR

The EIR addressed utilities in Section 4.17. It identified a potentially significant impact related to construction of new or expanded infrastructure for wet and dry utilities, which could result in adverse physical changes to the environment (Impact 4.17-2). Regarding mitigation, the EIR explained that the construction of new or expanded utilities infrastructure that could result adverse physical changes to the environment was already evaluated and identified throughout the other sections of the EIR. Where impacts were potentially significant, the EIR identified potentially feasible mitigation measures to avoid or substantially lessen the impacts. As a result, no additional mitigation measures were identified in Section 4.17 of the EIR to address the potentially significant impacts of constructing new or expanded utility infrastructure.

The EIR also identified a potentially significant impact due to adverse effects on available water supplies during normal, single-dry, and multiple-dry year scenarios from implementation of the General Plan (Impact 4.17-4). The EIR included Mitigation Measure UTL-1 requiring specified water-demand projects to demonstrate adequate water supplies during normal, single-dry, and multiple-dry year scenarios prior to project approval, which would lessen but not avoid this significant impact. Therefore, this impact was determined to be significant and unavoidable and a Statement of Overriding Considerations was adopted by the Board.

The EIR did not identify potentially significant impacts related to disruption or rerouting of existing utility facilities (Impact 4.17-1); inadequate wastewater treatment capacity (Impact 4.17-3); or adverse effects on a landfill's disposal capacity (Impact 4.17-5).

4.17.2 Changes in the Project

The Housing Element does not involve changes to the General Plan that relate to utilities impacts.

4.17.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No substantial changes in circumstances under which the project is being undertaken, or new information of substantial importance, which was not known and could not have been known with the exercise of reasonable due diligence at the time the EIR was certified as complete, related to utilities, have been identified during the preparation of this checklist.

4.17.4 Impact Analysis

Would the Housing Element:

- a) Cause a disruption or rerouting of an existing utility facility?
- b) Increase demand on a utility that results in the relocation or construction of new, or expansion of existing water, wastewater, electric power, natural gas, or telecommunications infrastructure, resulting in the potential for significant environmental impacts?
- c) Result in inadequate wastewater treatment capacity to serve future demand, in addition to the provider's existing commitments?
- d) Result in development that would adversely affect water supply quantities during normal, single-dry, and multiple-dry years?
- e) Result in a direct or indirect adverse effect on a landfill's disposal capacity, such that it reduces its useful life to less than 15 years?

Implementation of the Housing Element would not result in changes to the type, density, location, or amount of future development allowed in the unincorporated area under the General Plan. Changes to General Plan land use designations or underlying zoning designations are not required to meet the RHNA targets; the Housing Element demonstrates that the General Plan already has adequate capacity to accommodate the County's housing allocation. As a result, the Housing Element would not change land use or zoning designations to accommodate additional or higher density housing relative what is already allowed under the General Plan and underlying zoning designations.

As described in Section 4.1, Aesthetics, Scenic Resources, Light Pollution, implementation of the Housing Element policies and programs would not result in development or other physical changes to the environment beyond what was previously identified in the EIR. Because implementation of the Housing Element would not result in construction of new or expanded infrastructure for wet and dry utilities, which could result in adverse physical changes to the environment adversely affect available water supplies during normal, single-dry, and multiple-dry year scenarios, disrupt or reroute existing utility facilities, cause inadequate wastewater treatment capacity, or adversely affect a landfill's disposal capacity beyond what was previously identified in the EIR, the Housing Element would not result in any new significant impacts or a substantial increase in the severity of significant impacts related utilities. Mitigation measures are not required.