

**Certification of the
St. John's Residential Community
Final Environmental Impact Report
SCH # 2016071030**



**California Environmental Quality Act
Findings of Fact
and
Statement of Overriding Considerations**

October 2017

TABLE OF CONTENTS

Section	Page
A. Introduction	1
B. Project Summary	1
B.1 Project Objectives	1
C. Environmental Review and Public Participation Process.....	2
C.1 Incorporation of Final EIR by Reference	3
D: Findings Regarding the Environmental Review Process and the Content of the Final EIR.....	3
D.1 Finding Regarding Custodian and Location of the Record.....	5
D.2 Absence of Significant New Information	6
E. Environmental Impacts.....	8
E.1 Findings Regarding Impacts Identified in the EIR to be Less Than Significant and Requiring no Mitigation	11
E.2 Findings Regarding Impacts Analyzed in the EIR and Determined to be Significant but Mitigated to Less Than Significant.....	49
E.3 Findings Regarding Impacts Analyzed in the EIR and Determined to be Significant and Unavoidable	74
E.4 Other CEQA Required Analysis in the EIR	82
F. Alternatives to The Project	85
F.1 Project Objectives and Legal Requirements.....	86
F.2 Findings Regarding Alternatives Considered in the EIR.....	87
G. Statement of Overriding Considerations.....	91
H. Adoption of a Mitigation Monitoring Program for the CEQA Mitigation Measures.....	93

A. INTRODUCTION

The Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2016071030) has been prepared by the City of Camarillo (City) to evaluate the environmental effects of the St. John's Residential Community Project (Project). The Project is described in **Section B**, below.

The City is the lead agency as defined in Section 15051(b) of the guidelines for implementing the California Environmental Quality Act (CEQA).

B. PROJECT SUMMARY

The St. John's Seminary Residential Community Project, which would be processed as a Residential Planned Development (RPD), zone change, and General Plan Amendment to identify potential land uses, phasing, design standards, and circulation patterns for approximately 88.45 acres, is located at the north side of Upland Road, easterly of Lewis Road and Somis Road. The Project will allow for the development of up to 300 residential units on 44.80 acres of the 88.45-acre Project site. Within the 44.80-acre development envelope, implementation of the proposed St. John's Seminary Residential Community Project would permit a mix of residential, open space, and recreational land uses. The project also proposes the provision of a new 0.26 acre (11,297 square foot) trailhead located off of Upland Road, along the southern boundary of the Project site.

B.1 Project Objectives

The following are the City's objectives for the St. John's Seminary Residential Community Project:

- Provide a planned development that furthers the community objectives for residential development including a variety of building forms and types and sensible neighborhood planning techniques
- Meet the community's need for a senior citizen housing development with a rural character and a low-medium density consistent the City's planning objectives.
- Respect the property's significant cultural and historical context by developing neighborhoods with architecture compatible with the adjacent St. John's Major Seminary campus;

- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

C. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION PROCESS

The City of Camarillo prepared and circulated a Notice of Preparation (NOP) from July 11, 2016 through August 10, 2016. The NOP was circulated in order to receive input from interested public agencies (e.g., responsible and trustee agencies) and private parties on the contents of the EIR. In compliance with *State CEQA Guidelines*, the City held a scoping meeting on August 4, 2016 to solicit comments from and to inform the public of the proposed EIR and its contents.

The City prepared and circulated the Draft EIR for a period of 45 days, extending from June 13, 2017 and ending on July 28, 2017. The Draft EIR was available for review at the City of Camarillo Department of Community Development, the City of Camarillo Public Library, and an electronic copy of the Draft EIR was posted on the City website. A Notice of Availability of the Draft EIR was transmitted to responsible and trustee agencies, regulatory agencies and others to request comments on the Draft EIR, pursuant to *State CEQA Guidelines* Section 15086. Comments on the Draft EIR were received during the comment period, and those comments are responded to in the Final EIR.

The Final EIR is comprised of the Draft EIR, including its technical appendices; the comments on the Draft EIR submitted by interested public agencies, organizations, and members of the public; written responses to the environmental issues raised in those comments; revisions to the text of the Draft EIR reflecting changes made in response to comments and other information; and other minor changes to the text of the Draft EIR. The Final EIR is hereby incorporated in this document by reference.

The Final EIR was distributed on September 21, 2017 more than 10 days prior to the October 3, 2017 Planning Commission hearing.

C.1 Incorporation of Final EIR by Reference

The EIR evaluated a Project, as well as alternatives to the Project. For purposes of these Findings, the Project is defined to mean the project studied in the EIR.

The Final EIR consists of: (1) the Draft EIR, (2) all appendices to the Draft EIR (Appendices 2.0 through 6.17); (3) Chapter 1, "Introduction"; (4) Chapter 2, "Responses to Comments"; (5) Chapter 3, "Corrections and Additions" (to the Draft EIR); (6) Chapter 4, "Mitigation Monitoring and Reporting Program." The Final EIR Chapters 2 and 3 specifically include the City's written responses to comments; a list of persons, organizations, and public agencies commenting on the Draft EIR; the City's written responses to specific comments on significant environmental points raised in the review and consultation process; and copies of comments, as required by *State CEQA Guidelines* Section 15132. The Final EIR consisting of the aforementioned components is hereby incorporated by reference into these Findings.

D: FINDINGS REGARDING THE ENVIRONMENTAL REVIEW PROCESS AND THE CONTENT OF THE FINAL EIR.

The City Council certifies that it has been presented with the Final EIR and that it has independently reviewed and considered the information contained in the Final EIR prior to making the following certifications and these Findings.

Pursuant to *State CEQA Guidelines* Section 15090 (Title 14 of the California Code of Regulations, Section 15090) the City Council certifies that the Final EIR has been completed in compliance with CEQA and the *State CEQA Guidelines*. The City Council certifies the Final EIR for the actions described in these Findings and in the Final EIR, for the Project as described above. The City Council further certifies that the Final EIR reflects its independent judgment and analysis.

Pursuant to Public Resources Code Section 21081 and *State CEQA Guidelines* Section §15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency, and not the agency making the finding. Such changes have been adopted by such agency, or can and should be, adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The City has made one or more of these specific written findings regarding each significant impact associated with the Project. Those Findings are presented below, along with a presentation of facts in support of the Findings. The City certifies these Findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these Findings, concerning the environmental issues identified and discussed.

The St. John's Residential Community EIR has been prepared as a Project EIR pursuant to *State CEQA Guidelines* Section 15161. The degree of specificity in the Project EIR corresponds to the specificity of the Project. The Project EIR included a detailed (conservative) analysis of impacts in 21 environmental topics, analyzing the Project and alternatives, including a No Project Alternative. The EIR disclosed the environmental impacts expected to result from the implementation and development of the St. John's Residential Community Project. Feasible mitigation measures were identified to avoid or minimize significant environmental effects.

The mitigation measures adopted as part of the Project are feasible, as appropriate for a Project EIR, and the St. John's Residential Community EIR mitigates the environmental impacts to the maximum extent feasible as discussed in the Findings made below. The Findings in **Section E**, below indicate where mitigation measures are not capable of reducing impacts to levels of less than significant.

It is the finding of the City Council that the proposed Final EIR fulfills environmental review requirements for the St. John's Residential Community and that the document constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA, and reflects the independent judgment of the City Council.

In response to comments received, the Final EIR includes corrections and additions that correct minor errors and amplify and/or clarify information in the Draft EIR. All such changes made to the Draft EIR are shown in the Final EIR (Chapter 3.0, Corrections and Additions) in strikethrough and underline text.

It is the finding of the City Council that such clarifying changes and the corrections and additions as described in the Final EIR, have not presented any new, significant information requiring recirculation or additional environmental review under CEQA Guidelines Section 15088.5.

A Mitigation Monitoring and Reporting Plan (MMRP) for the St. John's Residential Community has been adopted pursuant to the requirements of Public Resources Code Section 21081.6 to ensure implementation of the adopted mitigation measures to reduce significant effects on the environment, and is included in the Final EIR document dated September 2017. The City is the custodian of the documents and other materials that constitute the record of the proceedings upon which certification of the EIR for the St. John's Residential Community, is based, as described below in **Section D.1, Finding Regarding Location and Custodian of the Record.**

D.1 Finding Regarding Location and Custodian of the Record

The documents and other materials that constitute the record of proceedings on which the City's Findings of Fact are based, are located at 601 Carmen Drive, Camarillo, California 93010.

The custodian of these documents is David Moe, Assistant Director of Community Development. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and 14 Cal. Code Regs. Section 15091(e).

For purposes of CEQA, the Record of Proceedings for the St. John's Residential Community EIR consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by the City in conjunction with the St. John's Residential Community EIR.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the 45-day public comment period on the Draft EIR.

- The Mitigation Monitoring and Reporting Program for the Project.
- All Findings and resolutions adopted by the City Council in connection with the Project, and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the St. John’s Residential Community EIR prepared by Impact Sciences, Inc., consultant to the City.
- All documents and information submitted to the City by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the St. John’s Residential Community EIR, up through the date the City Council approved the Project.
- Minutes and/or summary transcripts of all public meetings and public hearings held by the City, in connection with the St. John’s Residential Community EIR.
- Any documentary or other evidence submitted to the City at such public meetings and public hearings.
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

D.2 Absence of Significant New Information

State CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The Guidelines provide examples of significant new information under this standard, as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The City Council recognizes that the Final EIR incorporates information obtained by the City since the Draft EIR was completed, and contains additions, clarifications, modifications, and other changes. With respect to this information, the City Council finds as follows:

Changes to Mitigation Measures

As described in the Final EIR and in the responses to comments, four mitigation measures have been modified, and one mitigation measure has been added. The City Council finds that these changes to Mitigation Measures 6.4-3, 6.4-5, 6.5-2, and 6.9-2, in the Final EIR augments the mitigation measures as proposed in the Draft EIR, strengthens the effectiveness of the proposed mitigation measures, responds to agency and public input, and enhances the clarity, but does not cause any new or more severe environmental impacts. Therefore, in accordance with CEQA and the *State CEQA Guidelines*, no recirculation of the EIR is necessary based on the changes and additions to the mitigation measures in the Final EIR.

Other Changes

Various minor changes and edits have been made to the text the Draft EIR. These changes are generally of an administrative nature such as correcting typographical errors, making minor adjustments to the data, and adding or changing certain phrases to improve readability and enhance clarity. The City Council finds that these changes are of a minor, non-substantive nature and do not require recirculation of the Draft EIR.

In addition to the changes and corrections described above, the Final EIR provides additional information in response to comments and questions from responsible agencies and the public. The City Council finds that this additional information does not constitute significant new information requiring recirculation, but rather that the additional information clarifies or amplifies an adequate EIR. Specifically, the City Council finds that the additional information including the changes described above, does not show that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

E. ENVIRONMENTAL IMPACTS

The City staff report, the EIR, written comments, written and oral testimony at public hearings, and these Findings and Statement of Overriding Considerations and other information in the administrative record serve as the basis for the City's environmental determination. The Final EIR includes revisions to the Draft EIR, public comments, and City responses. The detailed analyses of potential environmental impacts and proposed mitigation measures for the Project are presented in the Draft EIR. Written comments and City responses, as well as some minor revisions to the impact and mitigation discussions, are provided in the Final EIR.

Presented below are the environmental findings made by this City Council after its review of the documents referenced above. Factual discussion in this document summarizes the information contained in the EIR and the administrative record upon which this City Council bases its decision to certify the EIR and approve the Project.

The EIR prepared for the Project identifies two individual significant environmental impacts within the 21 issue areas, which cannot be fully mitigated and are therefore considered significant and unavoidable impacts. To the extent these impacts remain significant and

unavoidable, such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations set forth in the Statement of Overriding Considerations. The significant and unavoidable impacts identified in the Draft EIR are discussed below, along with the appropriate findings per *State CEQA Guidelines* Section 15091. The City Council concurs with the conclusions in the Draft EIR that the issues and sub-issues discussed below can be mitigated below a significant impact threshold. For those issues that cannot be mitigated below a level that is less than significant, overriding considerations exist which make those impacts acceptable.

After analysis in the Draft EIR in Sections 6.1 through 6.21, 8.0 and 9.0, impacts in the following areas were determined to be less than significant: Aesthetics, Energy, Geology and Soils, Hazards and Hazardous Materials, Land Use, Mineral Resources, Population and Housing, Public Services (Fire Protection, Law Enforcement, Education, Parks and Recreation), Transportation and Traffic, Tribal Cultural Resources, and Utilities (Wastewater and Water). Based on the analysis in the Draft EIR and other evidence in the administrative record relating to the Project, the City Council finds that the foregoing environmental impact categories will not result in any significant impacts and that no mitigation measures are needed. The rationale for the conclusion that no significant impact will occur in each of these issue areas is summarized below in Section E.1.

The aspects of the impact categories analyzed in the Draft EIR that were found to have potentially significant impacts that can be reduced to a less than significant level through imposition of regulatory compliance measures, mitigation measures, and conditions of approval include: Air Quality, Biological Resources, Cultural Resources (Archaeological and Paleontological Resources), Hydrology and Water Quality, and Utilities (Solid Waste). The rationale for the conclusion that no residual significant impact will occur in each of these issue areas following implementation of the regulatory compliance measures, mitigation measures, and conditions of approval is summarized below in Section E.2.

Implementation of the Project will result in significant and unavoidable impacts to Agricultural Resources and Cultural Resources (Historical Resources) and are described below in Section E.3.

All Final EIR mitigation measures (as set forth in the Mitigation Monitoring and Reporting Program included as Section 4.0 of the Final EIR) have been incorporated by reference into the Project's conditions of approval. In addition, the other required conditions of the Project Approvals further lessen the potential effects of the Project.

The City Council finds, based on the Final EIR, that there are no significant cumulative impacts, or that the regulatory compliance measures, and the Project's mitigation measures, and conditions of approval will reduce the Project's contribution to less than cumulatively considerable levels, concerning Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality; Land Use, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources, and Utilities.

Differences of Opinion Regarding the Impacts of the Project

In making its determination to certify the Final EIR and to approve the Project, the City Council recognizes that the Project involves some controversial environmental issues and that a range of technical and scientific opinion exists with respect to those issues. The City Council has acquired an understanding of the range of this technical and scientific opinion by its review of the Draft EIR, the comments received on the Draft EIR and the responses to those comments in the Final EIR, as well as testimony, letters, and reports regarding the Final EIR and its own experience and expertise in assessing environmental impacts. The City Council has reviewed and considered, as a whole, the evidence and analysis presented in the Draft EIR, the evidence and analysis presented in the comments of the Draft EIR, the evidence and analysis presented in the Final EIR, the information submitted on the Final EIR, and the reports prepared by the experts who prepared the EIR, consultants, and by staff, addressing those comments. The City Council has gained a comprehensive and well-rounded understanding of the environmental issues presented by the Project. In turn, this understanding has enabled the City Council to make its decisions after weighing and considering the various viewpoints on these important issues. The City Council accordingly certifies that its Findings are based on full appraisal of all of the evidence contained in the Final EIR, as well as the evidence and other information in the record addressing the Final EIR.

In making these Findings, the City Council has considered the opinions of other agencies and members of the public. City Council finds that the determination of significance thresholds is a judgment within the discretion of the City Council; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

E.1 Findings Regarding Impacts Identified in the EIR as having No Impact, or are Less Than Significant and Requiring No Mitigation

The following issues were found in the EIR as having no impact or the potential to cause a significant impact and therefore require no project-specific mitigation.

Aesthetics

Potential Effect

Implementation of the Project could result in Project-related changes in the visual character of the Project Site and surrounding environment. In addition, the Project could create a new source of shadows, light, or glare which could adversely affect day or nighttime views in the area.

Finding

The Project would alter the visual character of the Project Site and create a more intensive developed use. However, the Project will employ building designs in a Spanish eclectic style architecture that is consistent with the existing St. John's Seminary Graduate Seminary, along with sensitive land use transition treatments, landscaping design, and consistency with applicable plans and regulations, including the City's hillside development standards, that will enhance the aesthetic value of the Project Site. Therefore, the Project would be consistent with the visual character of the surrounding area and no impacts would occur. As required by the City of Camarillo Municipal Code, new light sources from the Project would be reviewed and approved by the City of Camarillo, and building materials would be low reflectivity; therefore, impacts related to lighting and glare would not occur. There are no shade/shadow sensitive uses located in close enough proximity to the Project Site that will have shadows cast on them; therefore shade/shadow impacts would not occur.

Supporting Explanation

Potential aesthetic impacts are discussed in Section 6.1 of the Draft EIR. The Project would physically alter the existing landscape; however, it would be developed in accordance with the City of Camarillo's landscape, grading, architectural, and land use guidelines.

Development of the Project would commence with the demolition of the St. John's Seminary campus, followed by mass and rough grading of the Project Site, followed by the construction and installation of backbone infrastructure, followed by the construction of the Project's homes and other structures. As a result, while the Project's grading phase is expected to be the most

visually intrusive due to the combination of earthmoving and equipment on site. Visual impacts may also occur during the phased construction of residential structures due to the presence of mobile construction equipment and unfinished structures. However, although the visual character of the Project Site will be altered from its current condition during construction, this impact is not considered significant for the following reasons: 1) the progressive and temporary nature of the grading and infrastructure construction activities (limited to a total of approximately 38 months); 2) views of the proposed development would generally be obscured by the existing natural grade and stands of mature trees within the site.; and; 3) there are already suburbanized developed areas surrounding the Project Site (commercial, residential, and institutional). Based on the above, the Project's construction activities would not substantially degrade the existing visual character of the Project Site or the surrounding area. Therefore, visual quality impacts associated with construction of the Project would be less than significant.

Once the Project is completed and fully occupied, the Project Site's deteriorating buildings and aging and marginally productive orchards would be replaced by a sensitively designed and landscaped development, and the Project would provide significant natural areas that offer aesthetic value, in particular, the retention of mature trees and an area planned for permanent open space would screen views of the proposed residential uses from the north. Further, given the intervening structures, highway berms and vegetation, the development of the proposed residential structures would not be visibly prominent from the surrounding public viewpoints, thus the existing visual character of the Project Site would not be substantially changed, and impacts would be less than significant.

The Project would introduce new sources of nighttime light and daytime glare as compared to current conditions. However, regulatory compliance measures that would reduce the amount of light and glare produced by the Project would be implemented. The Project would not create substantial glare effects during daytime hours, as only low-reflective building materials such as stucco, wood, and/or stone would be used on building exteriors. Additionally, landscaping would partially screen residential structures from view from Upland Road and as such there would not be an opportunity for motorists (i.e., the most likely to experience glare conditions) to be affected. Therefore, impacts would be less than significant.

Regulatory Compliance Measures

RCM 6.1-1: Prior to the issuance of a grading permit, grading plans shall be submitted to the City of Camarillo Public Works Department for review and approval. Grading

plans will be subject to the hillside development standards contained in the City's Municipal Code.

- RCM 6.1-2:** Prior to the approval of the final tract map, a landscape plan shall be prepared and submitted to the City Community Development Department for review and approval. The plan shall be prepared and certified by a licensed landscape architect, and shall comply with Community Development standard plans and adopted planned community regulations.
- RCM 6.1-3:** Prior to issuance of a grading permit, a lighting plan prepared by a lighting consultant shall be submitted to the City of Camarillo Department of Community Development for review and approval. The lighting plan shall incorporate recommended guidelines (0.5 foot-candle, the minimum parking lot security level) as a threshold for spill and the minimum streetlamp glare level of 2.0 foot-candles).
- RCM 6.1-4:** When installed, all street lighting fixtures shall be tested and adjusted to ensure that light levels do not exceed 2.0 foot-candles of glare and 0.5 foot-candle of spill at the project boundaries. Testing of street lighting fixtures shall be conducted by factory-trained and -employed technicians only.

Project Design Features

- PDF 6.1-1:** To minimize the effects of grading, all manufactured slopes shall be planted with shallow-rooted, soil-binding plants as soon as possible (preferably within three months) after completion of grading.
- PDF 6.1-2:** All concrete structures, such as drainage ditches, detention basins, rip-rap, crib walls, swales, or curbs, located in natural areas shall be constructed with colored concrete to blend with the surrounding terrain.
- PDF 6.1-3:** To minimize the change in the visual character of the site, tree screens shall be placed where feasible to reduce views of the proposed structures. Trees shall be consistent with the character of the area or the historic character of the site, and (at maturity) shall be of sufficient size as to screen the proposed structures. Initial planting sizes shall comply with the City of Camarillo's landscape design standards.

Energy

Potential Effect

The construction and operation of the Project will involve the consumption of petroleum-based fuels, electricity, and natural gas. This consumption could potentially involve inefficient, wasteful, and/or unnecessary use of energy, which could potentially result in a significant impact on energy resources.

Finding

The analysis in the EIR focused on whether the Project would result in a wasteful or inefficient consumption of energy, and whether mitigation is required to avoid or reduce inefficient or wasteful consumption of energy. Through the Project's compliance with all applicable federal, State and City energy standards and building code provisions, potential energy resource impacts from the Project would be reduced to a less than significant level

Supporting Explanation

Potential energy resource impacts are discussed in Section 9.0, Other CEQA Considerations, of the Draft EIR.

During construction of the Project, energy would be consumed in the form of petroleum-based fuel for construction equipment, worker vehicles, and delivery trucks, as well as electricity utilized for lighting and equipment, and energy used in the production of construction materials. Utilizing the California Emissions Estimator Model (CalEEMod) modeling, the Project's annual estimated consumption of petroleum based fuel during construction would represent less than 0.006 percent of statewide gasoline consumption and 0.009 percent of statewide diesel consumption. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment, as well as idling restrictions, which together will result in less fuel consumption. Electricity use during construction will be limited in scope and duration, and would be expected to be supplied by gasoline, propane, or diesel-powered generators, rather than drawing power from the local electrical grid. In addition, the Project would feature a sustainable design to comply with CALGreen¹ which would also result in the use of sustainable

¹ The California Green Building Standards Code, which is Part 11 of the Title 24 Building Standards Code, is commonly referred to as the CALGreen Code.

materials and recycled content that would reduce energy consumption during Project construction.

At buildout, the Project's uses would demand 1,739,400 kilowatt-hours (kWh) per year, representing 0.0015 percent of the conservatively estimated electricity delivery capacity. The Project is also estimated to demand 66,510.25 cubic feet per day (cf/d) or 24 million cubic feet per year (MMcf/y) of natural gas, representing 0.0025 percent of the conservatively estimated total natural gas supply delivered for the service area. In addition, the Project's future residents are estimated to use approximately 253,100 gallons of gasoline and 37,331 gallons of diesel annually, which represents less than 0.0017 percent of the statewide annual gasoline consumption and less than 0.0013 percent of the statewide annual diesel consumption. This is a conservative estimate, given that it assumes no electric, hybrid, or other alternate fuel use vehicles in the fleet mix. In addition, although the Project would create additional demands on electricity and natural gas supplies and distribution infrastructure, these demands are within the service capabilities of Southern California Edison (electricity provider) and the Southern California Gas Company (natural gas provider).

These facts show that the Project would not involve the inefficient, wasteful, and unnecessary use of energy resources in either its construction or operational phase, and energy resource impacts would be less than significant.

Geology and Soils

Potential Effect

The Project Site is located within a seismically active region, and during a moderate or major earthquake occurring nearby, Project improvements could potentially be subject to hazards associated with seismically-induced ground rupture, ground motion, and ground failure, including liquefaction and lateral spreading. In addition, hazards associated with expansive soils and cut and fill stability, as well as impacts associated with erosion or hillside stability, could potentially occur as a result of the construction of the Project.

Finding

Geotechnical and engineering geologic investigations have focused on engineering properties, geologic hazards, fault rupture and slope stability. Existing studies indicate that the development is feasible and impacts would be less than significant provided all current codes, and geotechnical report and City recommendations are followed.

Supporting Explanation

Geology and Soils impacts are discussed in Section 6.6 of the Draft EIR, and are fully analyzed in the Geotechnical Reports. The Geotechnical Reports provide the results of field investigations, including subsurface exploration, and laboratory testing to determine the characteristics of the subsurface conditions at the Project Site, as well as design recommendations based on a review of a conceptual grading plan and a description of the Project.

The Project will not use septic tanks or alternative wastewater disposal measures and therefore there will be no impacts associated with use of such systems and methods.

The Project is located partially within an established Alquist-Priolo Earthquake Fault Zone (APEFZ) and partially within a City designated Fault-Rupture Hazard Zone (FRHZ) for surface fault rupture hazards. The APEFZ is defined based on active faults projected toward (one just into) the project site and the FRHZ is based on an approximately 400-foot-wide zone north of the trace of a fault that was discussed in Weber and others² within the Simi-Santa Rosa fault zone presumed active or potentially active. Based on the Geolabs 2006 study, only one “minor” fault (stated to be 6-inches of vertical offset in bedrock) was detected in a site-specific fault investigation; this is located in the southern one-third of the proposed development area. A follow-up study in 2008 determined that the fault would have a defined zone of deformation and a February 2012 report indicates a setback zone would be proposed without an associated zone of deformation. No further investigation was performed to locate the FRHZ/Weber fault and the APEFZ trenches (Geolabs and those to the east) did not cross the drainage where this fault is mapped by Weber and the City of Camarillo. Therefore, the potential for surface rupture (and related deformations) as a result of fault plane displacement along the Weber fault during the design life of the project is potentially significant.

Due to the long periods between moderate to large earthquakes in this region, it is unlikely that ground rupture or strong seismic groundshaking would occur within the proposed residential development area during the relatively short construction period. Also during this time (assuming normal construction and occupancy phasing) there would be minimal occupancy and impacts would be less than significant.

² Weber, F.H., Jr., Cleveland, J.E., Kahle, J.E., Kiessling, E.W., Miller, R.V., Mills, M.F. and Morton, D.M., 1973, Geology and mineral resources study of southern Ventura County, California: California Division of Mines and Geology Preliminary Report 14, 102 p., map scale 1:48,000.

Following construction and occupancy of the buildings and operation of the infrastructure, structures and occupants of the development would be at risk for damage and injury, respectively, if they were within a resulting zone of fault rupture and deformation. The project will be required to comply with all current City of Camarillo building and safety codes, which has adopted by reference the CBC, including setback requirements set forth in the Final Geotechnical Report. Compliance with these documents would reduce impacts to a less than significant level.

It is likely that strong seismic ground shaking will occur over the course of the project's lifetime and impacts could be potentially significant. The project will be required to comply with the California Building Code (CBC) and applicable City codes, as well as recommended stabilization measures set forth in the Final Geotechnical Report. Compliance with these documents would reduce impacts to a less than significant level.

Liquefaction is the loss of soil strength induced by a seismic event. Generally, liquefaction potential is greatest where the ground water level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less below the ground surface. The project site is not within a liquefaction hazard zone as designated by the State of California and the City of Camarillo Groundwater is not known to exist within the alluvium beneath the proposed residential development area; the potential for liquefaction on the project site is considered less than significant.

Landslides involve the vertical and lateral movement of large earth masses under by gravity (and possible initiated by earthquake forces). If landslides encroach into areas with structures, these structures can be severely damaged or destroyed, and occupants can be seriously injured if such failures were to occur without some advanced warning (e.g., slope cracking and/or structural deformation). State hazards maps for the proposed residential development area show the northern boundary and a portion of the site drainage feature to be susceptible to earthquake-induced landslides. There are known, relatively small landslides on and near the proposed residential development project site mapped by Geolabs, and the potential exists for grading to create unstable slopes that could lead to the formation of landslides. A previously mapped landslide (shown on City maps) was deemed not to exist by Geolabs studies.

All subsurface borings and slope stability analysis focused on the northern north facing slope area; rotational failures (failure through the Saugus Formation bedrock) were analyzed and failures along planar features (e.g., bedding, faults, and shears) were not considered. Some out-of-slope planar features were noted in the boring logs. In their 2016 study report Geolabs

concluded based on their analysis of the northern north facing slope that it has both static factors of safety (greater than 1.5) and seismic deformations (5 to 15 centimeters) that would be at or above acceptable values for residential construction areas and no setbacks into the project from the top of the existing slope are required. They recommend that foundation/slab-on-grade system for the residential structures to be reinforced in a manner to account for some tensional stress.

Following construction and occupancy of the buildings and operation of the infrastructure, structures and occupants of the development would be at a higher risk for damage and injury, respectively, if small or large landslides were to be triggered either by earthquakes or by other factors such a heavy rainfall or underground water sources. Implementation of the stabilization improvements included in the Final Geotechnical Report, as well as the standard plan checking requirements which would ensure stabilization of proposed cut slopes that are potentially unstable. Impacts would be less than significant.

Construction activity associated with large-scale grading can result in wind, gravity, and water driven erosion of earth materials (soils and geologic units) if soil is disturbed, exposed, or stockpiled. After construction and covering the sites with pavement and landscaping, this potential impact is substantially reduced. Due to the extent of grading there could be a substantial loss of topsoil on the project site, which would convert what remains of the site agricultural land to urban use, necessitating topsoil removal as part of geotechnical remediation. Other areas remove the existing topsoil from use by covering it with roadways and other residential uses. Therefore, impacts would be potentially significant during construction.

To prevent soil erosion as part of the project, the applicant must comply with conditions under the National Pollutant Discharge Elimination System (NPDES) Permit set forth by the Regional Water Quality Control Board (RWQCB), and to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to be implemented during project construction. The SWPPP Best Management Practices (BMPs) ensure that erosion and sediment transport are minimized to assure that potential off-site impacts during construction would be reduced to less than significant. In addition, the applicant would be required to adhere to Ventura County Air Pollution Control District Rule 55 – Fugitive Dust,³ which would further reduce the wind erosion impacts to less than significant. After construction impacts associated with soil erosion or the continuing loss of topsoil would be considered less than significant.

³ Ventura County Air Pollution Control District Rule 55 – Fugitive Dust, Adopted 6/10/08.

There are five geologic units; four surficial and one bedrock unit within the proposed residential development area. Without engineering modification, the surficial units at the project site would be consolidation prone, erodible, and would make poor foundation materials. These conditions could lead to damage for any structures placed over these materials. In general the bedrock has suitable characteristics with regard to erosion, consolidation, and foundation stability. Expansive soils units are found in the Saugus formation bedrock that could cause damage to foundations and walls due to repeated drying and wetting (shrink and swell). Therefore, geologic, soils, and geotechnical impacts would be potentially significant during construction and occupancy of the Project.

During grading, soil conditions can impact equipment operations and personnel safety if geologic or soil units are made unstable by excess rainfall, surface runoff, infiltration, erosion, or equipment vibration, particularly in hillside terrain. However, the CBC regulates excavation, foundations, and retaining walls; contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials; and regulates grading activities, including drainage and erosion control. As such, observation of all State and local safety regulations during all phases of construction operations would ensure that impacts would be less than significant.

Following construction and occupancy of the Project, the long-term stability (and instability) of soil and geologic units can impact the stability of structures, and natural and manufactured slopes. However, implementation of the stabilization improvements included in the Final Geotechnical Report, as well as the standard plan checking requirements which would ensure stabilization of proposed cut slopes that are potentially unstable. Impacts would be less than significant.

Greenhouse Gas Emissions

Potential Effect

Implementation of the Project would directly or indirectly result in increased greenhouse gas emissions (GHG) associated with the construction and operation of the Project, including energy consumption and water usage, and vehicle trips to and from the Project. Construction and operation of the Project could potentially conflict with applicable GHG emissions reduction plans, policies, or regulations.

Finding

Construction and operation of the Project would generate new direct and indirect GHG emissions. The analysis indicated that the construction and operation of the Project would not conflict with applicable GHG emissions reductions plans, policies, or regulations. As a result, construction and operation of the Project would not have a significant impact with respect to GHG emissions.

Supporting Explanation

The GHG emissions generated by the construction and operation of the Project, as well as the Project's consistency with the applicable regulations, plans, and policies set forth by the State of California, the and the City to reduce GHGs, are analyzed in Section 6.7 of the Draft EIR.

The Project site is within the jurisdiction of the VCAPCD. However, the California Air Resources Board (CARB), the Ventura County Air Pollution Control District (VCAPCD), and the City of Camarillo have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the project's contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; AB 32, the 2016-2040 RTP/SCS and the City of Camarillo's municipal code. The analysis in the EIR compared the Project's GHG emissions to the emissions that would be generated by the project in the absence of any GHG reduction measures, i.e., the No Action Taken ("NAT") Scenario.

Implementation of the project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's Climate Change Scoping Plan for the implementation of AB 32.

The project is consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Climate Change Scoping Plan,

the project would use “green building” features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (SCS/RTP), a reduction in vehicle miles traveled (VMT) within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant reductions in comparison to NAT and would be consistent with the SCS/RTP.

The Project also would comply with the City of Camarillo building code, which emphasizes improving energy conservation and energy efficiency, and compels compliance with CALGreen for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. It would also require compliance with Title 24’s focus on energy-efficient buildings through improved design of the building envelope, heating and cooling, water heating, and lighting features.

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and other features to reduce VMT to reduce the Project’s potential impact with respect to GHG emissions. With implementation of these features, the project results in a 31 percent reduction in GHG emissions from NAT. The Project’s GHG reduction measures make the project consistent with AB 32.

As discussed above, the project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the project is not directly subject to the Cap and Program, that Program will indirectly reduce the project’s GHG emissions by regulating “covered entities” that affect the project’s GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California’s direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing

employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Thus, given the project's consistency with State, regional, GHG emission reduction goals and objectives and the City of Camarillo's building code the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the project's impacts would be cumulatively less than significant.

Hazards/Hazardous Materials

Potential Effect

Construction and/or operation of the Project could potentially create a significant hazard to the public or the environment due to the potential presence of hazardous conditions and/or hazardous materials on or in the vicinity of the Project Site.

Finding

A number of documented hazardous conditions exist on the Project site. Existing structures on the site contain both asbestos-containing materials and lead-based paint. Construction, including the removal of all existing hazardous materials, would occur adjacent to St. John's Major Seminary. Finally, the Project site is adjacent to areas designated as having a moderate fire hazard on state fire hazard maps. However, Regulatory Compliance Measures are provided in Section 6.8, Hazards and Hazardous Materials, and in Section 6.13, Public Services – Fire Protection, the EIR which would address these potential impacts and reduce all to a less than significant level.

Supporting Explanation

Potential impacts pertaining to hazards and hazardous materials are assessed in Section 6.8 of the Draft EIR.

The Project is not within the vicinity of a private air strip, within two miles of a public airport (the nearest identified airport is approximately four miles from the Project Site), or located within the boundaries of an airport land use plan. Thus, there will be no impacts with respect to presence of hazards or hazardous materials from airports within the Project Site vicinity. Nor would the Project interfere with or physically impair an adopted emergency response plan or emergency evacuation plan, as roadway linkages included as a component of the Project would improve access to the Project Site for both residences and emergency personnel. Therefore, no potential impacts would occur with respect to such emergency plans.

Multiple environmental site assessments have been conducted for the Project Site, and the most recent of which is included in Appendix 6.8 of the Draft EIR.

Grading and construction activities are associated with certain routine hazardous materials including fuel, building materials, and paint. No acutely hazardous materials would be routinely transported to, used on, or disposed of on the Project Site. The lead paint and asbestos surveys conducted for the Project identified quantities of asbestos-containing materials (ACM) and lead-based paint in existing structures on the Project Site. Removal of these substances prior to demolition would pose a potentially significant impact.

Demolition activities would result in the removal of ACM and lead-based paint from the site. Under VCAPCD Rule 62.7, notification would be provided to VCAPCD prior to removal of ACM, along with information on the amount of ACM to be removed and plans for storage and disposal of ACM. All removal of ACM would be conducted by a licensed asbestos removal contractor using approved techniques and equipment and would be subject to the emissions requirements of VCAPCD Rule 62.7.

Lead-based paint would be removed and disposed of by a licensed lead removal contractor using approved techniques and equipment subject to the requirements of CCR Sections 1532.1 et seq. and 35001 et seq.

The County of Ventura *Hazardous Materials Business Plan* (HMBP) provides regulations for disposal of hazardous materials using approved haul routes.⁴ The presence of hazardous materials associated with demolition and construction activities on the Project Site would be subject to stringent regulation and would be temporary. Compliance with all applicable regulations would reduce impacts to less than significant.

⁴ County of Ventura, Certified Unified Program Agency, Hazardous Materials Program, website: <http://www.vcrma.org/envhealth/cupa/index.html>. November 2016

The Project would provide 300 units of senior citizen housing development. During Project operation, typical household chemicals such as cleaning solvents would be used in the Project residences. However, these products do not pose a substantial risk to people or property and are not likely to be hazardous to the environment if correctly disposed of. Operational impacts for hazards and the use of hazardous substances by the Project Site would not have the potential to result in significant impacts associated with the transportation, use, or disposal of these household chemicals. The City of Camarillo maintains a household hazardous waste program that provides for the disposal of these materials. Impacts would be less than significant.

The nearest public school, La Mariposa Elementary, is approximately 0.4 mile from the project site. The existing St. John's Major Seminary is located within 0.25 mile of the Project Site. No new schools are proposed within 0.25 mile of the Project Site. Demolition of existing structures on the Project Site would require the removal of ACM and lead-based paint. Removal and transportation of these hazardous materials within 0.25 mile of the existing St. John's Seminary would be a potentially significant impact. As part of the demolition of the existing structures, these hazardous materials would be removed and disposed of by a licensed contractor, in accordance with VCAPCD Rule 62.7 and state lead-based paint regulations.⁵

Construction of the Project would involve the routine use and transport of hazardous materials such as fuel, building materials, and paint. No acutely hazardous materials would be used or transported. Compliance with all applicable regulations would reduce impacts to less than significant.

The residential uses proposed on the Project Site would not emit hazardous emissions or result in the use of any acutely hazardous materials. Typical household chemicals such as cleaning products would be used and stored on the Project Site, but these substances would not present a significant risk to adjacent uses. Impacts would be less than significant.

The Project Site is surrounded by and contains agricultural and urbanized land uses. Existing agricultural uses on the Project Site would be removed and replaced with irrigated landscaping, roads and paved areas, and residential uses. As indicated in Section 6.13, Public Services – Fire Protection, the Project Site does not contain any areas designated as having high fire hazard on state wildfire hazard maps. Development of the Project would be subject to Ventura County Fire Protection District (VCFPD) requirements for access, water supplies, and fire protection

⁵ California Code of Regulations, Sections 1532.1 et seq. and 35001 et seq.

systems. All structures constructed as part of the Project would contain automatic fire suppression systems, and fire protection facilities would be subject to review and approval by VCFPD. Following the implementation of Regulatory Compliance Measures related to fire hazards, impacts would be less than significant.

Regulatory Compliance Measures

RCM 6.8-1: Prior to the issuance of demolition permits, a licensed asbestos assessment contractor shall conduct a study of all on-site structures to identify all asbestos-containing materials, and submit a report presenting the findings of the study to the City of Camarillo for review and approval. Furthermore, all asbestos-containing materials shall be removed by a licensed asbestos removal contractor according to the requirements of VCAPCD Rule 62.7. Certification of removal shall be approved by VCAPCD or the City of Camarillo prior to demolition of any existing structure.

RCM 6.8-2: Prior to the issuance of demolition permits, a licensed lead-based paint assessment contractor shall conduct a study of all on-site structures to identify all lead-based paint, and submit a report presenting the findings of the study to the City of Camarillo for review and approval. All lead-based paint materials shall be removed by a licensed lead-based paint removal contractor according to the requirements of CCR Sections 1532.1 et seq. and 35001 et seq. Certification of removal shall be approved by the City of Camarillo prior to demolition of any existing structure.

RCM 6.8-3: Prior to the issuance of grading permits, soil sampling shall be conducted in areas where agricultural activities have historically occurred, or where agricultural chemicals have been stored, to characterize any residual agricultural chemicals. If sampling identifies contaminated soils, such soils shall be remediated subject to the approval of the City of Camarillo and/or VCEHD.

Land Use

Potential Effects

The Project could be deemed inconsistent with applicable City planning and zoning regulations for the Project Site, including, but not limited to, the General Plan. In addition, the Project could be deemed inconsistent with relevant regional planning efforts and policies. Such

inconsistencies, if severe enough, could potentially result in a significant physical impact on the environment.

Finding

Following a review of applicable adopted plans and policies that regulate land use on the Project Site, the City finds that the Project is consistent with these applicable land use policies, plans, and ordinances. Therefore, no significant impacts regarding land use and planning exist.

Supporting Explanation

Potential land use impacts are assessed in Section 6.10 of the Draft EIR. There is no Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) within the area of the project site.

The proposed residential development of the site would be considered in-fill within the City's Camarillo Urban Restriction Boundary (CURB) line. The proposed land use designations and zoning would alter the current designations to Residential Planned Development (RPD). The project would not physically divide an established community because the proposed residential development site is situated high enough to have a significant height buffer between the unincorporated agricultural land to the north. In addition, the site would be consistent with surrounding land designations to the east, west, and south because the current designations would either be similar to the proposed designations or would be buffered from the proposed residential land uses.

As required by State law, the Project would have to be consistent with the City's General Plan Land Use Element, Open Space and Conservation Element, and CURB. The Project would also have to be consistent with the City's zoning plans, Hillside Development Standards, and zoning map amendments. As such, the Project requests a General Plan amendment and zoning amendment. With the approval of the General Plan amendment and zoning change, the Project would be consistent with the City's General Plan map, land use designations, and goals and policies. Impacts related to land use would be less than significant.

Mineral Resources

Potential Effect

A significant impact would occur if implementation of the project would 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.

Finding

No mineral resources exist on the project site that would be considered of value to the region or state. Ventura County performed a study as part of its Mineral Reserve Management Program which did not identify any aggregate resources of statewide significance in the Camarillo areas.⁶ The project site is identified by the County as a Mineral Resource Zone (MRZ) 1; these are areas where adequate information indicates that no significant mineral deposits are present.⁷ Therefore, no impact is identified for this issue.

Population and Housing

Potential Effect

A significant impact would occur if the Project causes substantial population growth in an area, displaces substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or displaces substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Finding

The California Environmental Quality Act (CEQA) Guidelines, Section 15125, requires that a Project be compared to existing local and regional plans. Impacts were determined by evaluating whether the population and housing increases that would result from the Project would cause year 2020 population and housing projections for the City to be exceeded. Under the analysis in the Draft EIR, the population and housing increases that would result from development of the Project would be less than significant.

⁶ City of Camarillo, Open Space and Conservation Element, July 2006, 9-7.

⁷ Ventura County, General Plan, Resources Appendix, June 2011, Figure 1.4.1.

Supporting Explanation

Potential population and housing impacts are assessed in Section 6.12 of the Draft EIR.

According to The Southern California Association of Governments (SCAG) projections, the City's population will increase to 72,200 by 2020, an increase of approximately 5,999 residents over the 2010 census population of 66,201 residents. The 2014 population estimate for the City of Camarillo is 66,923 residents. As a senior citizen housing community (the housing must include at least one person who is age 55 or older) a conservative estimate average household size is 2.00 residents, meaning the Project would add approximately 600 residents. The population generated by the Project added to the estimated population would not exceed the 2020 population projections of 72,200 for the City of Camarillo. As the Project would not induce population growth in excess of that projected for the City, the Project's direct impacts would be less than significant.

The Project Site currently contains no housing or residents. The Project proposes a senior citizen housing development which would comprise 300 dwelling units. As such, implementation of the Project would not displace any existing housing, nor would it necessitate the construction of replacement housing elsewhere. No impacts would occur.

Public Services:

Fire Protection

Potential Effect

The Project could increase demand for fire protection and emergency medical services provided by the VCFPD, as well as increase demand for water to meet fire flow requirements, which could be considered a significant impact if Project demand requires new or physically altered governmental facilities and/or water infrastructure in order to maintain acceptable service ratios, response times, fire flow requirements or other performance objectives.

Finding

Following the implementation of all Regulatory Compliance Measures impacts related to fire protection services, emergency medical services, and fire flow infrastructure will be adequate to accommodate the Project. Thus, implementation of the Project would result in a less than significant impact.

Supporting Explanation

Potential impacts to fire services are analyzed in Section 6.13 of the Draft EIR.

Development of the site would introduce people and new structures into a site which currently contains the vacant buildings of the St. John's Seminary College and agricultural uses. Land uses would mainly include residential uses, including the addition of 300 residential units and a new community center. The Project would increase the demand for fire and emergency services, as well as non-emergency services. Non-emergency services could include services such as fire safety inspections, building inspections, fire code investigations, and code compliance. Emergency responses could include medical and fire protection services.

During construction, construction materials and debris would be present on the project site, in association with the framing operations, electrical, plumbing, communications, and ventilation systems that are installed. Construction equipment may emit sparks that would present a risk of causing fire, especially during site clearance. Implementation of standard safety procedures would reduce this risk and the related impacts to less than significant levels.

Construction of the Project would increase traffic both on and adjacent to the project site during working hours because commuting construction workers, trucks, and other construction vehicles would be added to normal traffic during buildout of the project. Slow-moving, construction-related traffic on local adjacent roadways may temporarily reduce optimal traffic flows on local roadways and could delay emergency vehicles traveling through the area. These delays would be intermittent and short-term in nature, and standard construction traffic control procedures would be implemented. Impacts related to construction would be less than significant.

The Project Site is adjacent to areas identified by the City as subject to elevated wildfire hazard. The steep topography and chaparral vegetation located in the northern portion of the project site adjacent to Calleguas Creek and undeveloped agricultural areas are highly conducive to wildfires. Project implementation would result in an increased demand for fire protection services associated with the proposed development of urbanized land uses.

For purposes of safety and fire hazard control, a vegetation management program focusing on management of highly combustible native vegetation and the reduction/control of invasive, combustible non-native species would be required. The VCFPD's hazard abatement program mandates a minimum 100-foot clearance of hazardous vegetation from all structures. All structures built in a high fire hazard area are also required to comply with local building code

requirements to help protect structures in wildland fire conditions. As a part of the Project, a minimum 100-foot-wide fuel modification zone would be provided along the northern portion of the site where it is contiguous to undeveloped areas. This fuel modification zone would be located within the 150-foot buffer required between the proposed residential units and adjacent agricultural and open space uses. The width of the fuel modification zone would be subject to approval by VCFPD and the City of Camarillo. The intent of this fuel modification zone is to deter wildfires from reaching development and urban fires from sweeping through open space areas. The fuel modification zone is proposed to be retained in as natural a state as safety and fire regulations permit.

The following factors will be considered in the determination of the width of the fuel modification zone:

- Natural slope of the land within the site and adjacent to the site
- Fuel loading (i.e., density of the natural vegetation)
- Access to the project area and the fuel modified area
- Availability of fire flow through a municipal water system.

A conceptual landscape plan has been provided to the City and will be subject to review and approval by the City and VCFPD.

A secondary access to the Project Site is required to allow emergency vehicular access and evacuation of the residential area. The secondary, emergency access would allow vehicular access and evacuation via the existing St. John's Major Seminary roadway. The secondary emergency access plan was reviewed and approved by VCFPD in July 2015 and requires no further improvement to the existing St. John's Major Seminary roadway. Other roadways and access facilities within the Project Site, including street alignments, grades, widths, lengths and turning radii, would be subject to City and VCFPD review as part of the approval process.

The primary fire station serving the Project would be Station 57, located at 3356 Somis Road, approximately 1.3 miles from the project site. The backup station for the Project would be Station 52, located at 5353 Santa Rosa Road, approximately two miles south from the project site. The response time from both of these stations is estimated to be four to seven minutes,

which meets the VCFPD's standard for response time.⁸ As discussed previously, VCFPD considers its current facilities adequate to serve the Project. Developers would be required to pay the City's fire protection facilities fee, which would provide funding for additional resources to respond to increased need within the City.

The VCFPD's fire flow requirement for residential development is 1,000 gpm at 20 psi. The most recent test of fire flow conducted in the project vicinity was conducted by Camrosa Water District, and recorded fire flow of 2,500 gpm at 148 psi, which exceeds requirements. Additional fire hydrants will be required in order to provide adequate fire protection to the proposed residential uses; these will be located according to VCFPD's requirements as part of the development approval process.

Operational impacts related to fire protection would be potentially significant; however with the implementation of all Regulatory Compliance Measures impacts would be less than significant.

Regulatory Compliance Measures

RCM 6.13-1: All structures adjacent to open space shall be designed to satisfy at least a 1-hour fire-resistant rating. Such structures shall incorporate fire retardant features such as boxed-in eaves, reduced overhangs, double-paned windows, convection resistant roof design, non-combustible roofing material, and related design features, as determined necessary by the VCFPD set forth in the City of Camarillo Building Code. Building permits shall not be issued until review of fire-retarding architectural features has been completed by the VCFPD and City of Camarillo Building Department. Design standards meeting VCFPD and City of Camarillo Building Department criteria shall be included in the Fire Hazard Reduction Program and incorporated into the Fire Hazard Reduction Design Guidelines for the residential units.

RCM 6.13-2: During all grading and site clearance activities, all earthmoving equipment shall be equipped with spark arrestors and at least two portable fire extinguishers per vehicle. All equipment used in the vegetation-clearance phase shall be equipped with spark arrestors and best available fire safety technology. The vegetation-clearance activities shall be coordinated with and approved by the VCFPD.

⁸ John Dodd, Fire Inspector, Ventura County Fire Protection District, personal communication with Doug Brown, September 10, 2008.

- RCM 6.13-3:** Prior to the issuance of building permits, the applicant shall be required to comply with all VCFPD design requirements regarding hydrant locations, fire ratings for building materials, fuel modification requirements, fee payments for pro-rata cumulative impacts, and other standard fire safety requirements.
- RCM 6.13-4:** The developer shall provide adequate access points, water mains, fire hydrants, valve connections, and other fire protection facilities as required by the County fire chief. Prior to obtaining building permits, the developer shall file fire protection improvement plans with the City of Camarillo and VCFPD. The plans shall be prepared to the satisfaction of the VCFPD. Upon approval of the plans, the VCFPD shall certify in writing to the City Department of Public Works that the proposed fire protection improvements have been found to be satisfactory.
- RCM 6.13-5:** Prior to issuance of building permits, the developer shall submit plans to the Ventura County Bureau of Fire Prevention for approval of the location of fire hydrants.
- RCM 6.13-6:** Fire hydrants shall be installed and in service prior to issuance of certificates of occupancy, and shall conform to the minimum standards of the City of Camarillo as well as the VCFPD.
- RCM 6.13-7:** A plan for delineating building addresses for purposes of emergency response shall be submitted to, and approved by, the City of Camarillo and VCFPD by the developer prior to the issuance of certificates of occupancy.
- RCM 6.13-8:** The developer shall pay the required fire protection facilities fees prior to the issuance of building permits.
- RCM 6.13-9:** Prior to the issuance of building permits, the developer shall provide proof of compliance with all applicable building and fire code requirements for items such as types of roofing materials, building construction, brush clearance, fire hydrant flows, hydrant spacing, access and design, fire sprinkler systems, and other hazard reduction programs, as set forth by the fire district.
- RCM 6.13-10:** The VCFPD and City Engineer shall review and tentatively approve proposed street alignments, grades, widths, lengths, and turning radii prior to approval of the tentative tract map by the City.

RCM 6.13-11: The developer shall provide landscape/fuel modification plans prepared by a licensed landscape architect to the fire district for review and approval prior to the issuance of certificates of occupancy. The use of drought-tolerant, fire-resistant, native vegetation shall be incorporated into the landscape/fuel modification plans.

RCM 6.13-12: To reduce emergency vehicle delays during construction, the applicant shall implement standard construction traffic control procedures, such as the use of flagmen, and signage showing traffic detour plans, haul routes, hours of operation, protective devices, warning signs and access to abutting properties would further reduce any potential impact.

Public Services:

Law Enforcement

Potential Effect

The Project could increase demand for law enforcement services, which could be considered a significant impact if Project demand requires new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Finding

The Project will result in a small change in the City's current officer-to-population ratio, but would not require additional law enforcement facilities in order to serve the Project. Impacts would be less than significant

Supporting Explanation

Potential impacts to police services are analyzed in Section 6.14 of the Draft EIR.

Site development and construction would not normally require services from the police department, except in cases of trespassing, theft, or vandalism. Such activities at a construction site are usual, but do not typically place undue demands on law enforcement services. Construction activity would increase traffic both on and adjacent to the Project Site during working hours because commuting construction workers, trucks, and other large construction vehicles would be added to normal traffic during the buildout period. Slow-moving construction traffic along local roadways may reduce optimal traffic flows and could

conceivably delay emergency vehicles or contribute to a vehicle collision. However, this potential is considered less than significant given the periodic and temporary nature of construction-related traffic. Implementation of standard construction traffic control procedures, such as the use of flagmen and signage showing traffic detour plans, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties, would further reduce any potential impact.

The additional residents generated by the Project would cause a slight decrease in the officer-to-population ratio within the City of Camarillo, from 0.78 officer per 1,000 residents to 0.77 officer per 1,000 residents with project implementation. One additional officer would be required to maintain current staffing ratios. No additional facilities would be needed to accommodate this increase, but any additional staff or facility needs would be addressed through the payment of fees which is required by City Ordinance. Thus, any potential impact is addressed through compliance with a City standard condition, and therefore, impacts would be less than significant.

Regulatory Compliance Measure

RCM 6.14-1: Prior to the issuance of any building permit, the project applicant shall pay the applicable City police facilities fee established by the City of Camarillo Ordinance 796. Such fees would be used to maintain, improve, or expand existing law enforcement facilities.

Public Services:

Education

Potential Effect

A significant impact would occur if Project demand requires new or physically altered governmental facilities in order to maintain acceptable service levels or other performance objectives.

Finding

Due to the nature of the Project, a senior citizen housing development, it is not expected that a substantial number of students would be generated by implementation of the Project. Any generation of new students from the Project would likely be incidental and negligible. Impacts would be less than significant.

Supporting Explanation

Potential impacts to education are analyzed in Section 6.15 of the Draft EIR.

Implementation of the Project would add 300 residential units to the City of Camarillo. Students from these residential units would attend schools in the PVSD (La Mariposa Elementary School or Tierra Linda Elementary School, and Monte Vista Middle School) and OUHSD (Adolfo Camarillo High School). Using standard student generation rates for a non-senior citizen housing development, the typical residential development would be expected to generate 132 students ranging from K-12.

Development of the site with a typical occupancy profile would normally add 54 elementary school students, 33 middle school students, and 45 high school students to existing schools, a total of 132 students. Existing elementary and middle schools have adequate capacity (156 elementary school seats and 290 intermediate school seats) to accommodate these students. Adolfo Camarillo High School is currently near its design capacity; however, the recently completed Rancho Campana High School has capacity to accommodate new students.

As the project is a senior citizen housing development and would be restricted to individuals 55 years and older, the standard student generation rates are not applicable to the project and the chances of any students being generated by the project is minimal and incidental. No new school facilities would be required and the project's impact on school facilities is less than significant. Nevertheless, the project will be required to pay statutory school fees as required by law and the project applicant would consult with the Pleasant Valley School District and Oxnard Union High School District for the amount of said fees.

Public Services:

Parks and Recreation

Potential Effects

The Project could increase demand for parks and recreation facilities provided by the Pleasant Valley Recreation and Park District (PVRPD) by virtue of its new residential population, which could be considered a significant impact if Project demand resulted in substantial physical deterioration of existing facilities or required new or physically altered park and recreation facilities to maintain acceptable parkland planning standards.

Finding

The Project will have private recreation facilities, including outdoor trails, parks and other open space; therefore, the likelihood residents will use their own community amenities to meet their recreational needs instead of PVRPD parks is high. State and local laws require development projects to dedicate parklands or pay fees in lieu of such dedication in order to expand and maintain park facilities. The Project Applicant shall pay associated in-lieu fees to the PVRPD for the purposes of expanding and maintaining park facilities. With the dedication of this fee, impacts of the Project on parks and recreation services would be less than significant.

Supporting Explanation

Potential impacts to park and recreation facilities are analyzed in Section 6.16 of the Draft EIR.

Development of the Project would add residents to the service area of the PVRPD. These residents could be expected to use parks managed by the PVRPD; the Project, therefore, would potentially increase the use of existing neighborhood and regional parks.

The open space and recreation areas within the Project include spaces for both passive and active use. The Project would include the creation of manufactured building pads, roadways, slopes, and open spaces. Based on the number of units and bedrooms proposed, the City would require approximately 450,000 square feet of open space within the Project Site. The Project would include approximately 40 acres of passive open space areas. These areas are anticipated to be landscaped in compliance with the City of Camarillo's landscape design standards and will be maintained by the Homeowners Association. These passive areas would allow people to jog, bike, and walk along the cement paths, and would provide connections between different areas of the project site for easy pedestrian access.

Furthermore, a clubhouse and recreation area is proposed on the northern portion of the project site and would be dedicated for active use. The space associated with recreational uses approximately 1.7 acres. The clubhouse amenities would include a fitness room, restrooms, a library, a grand room, a kitchen, and lounge. Outdoor recreational amenities included in the recreational space would include a spa, a pool, bar-b-que pits, open seating gathering areas, bocce courts, and an event lawn.

The residential units developed by the Project would add approximately 600 residents to the project site. As proposed the project would provide approximately 41.8 acres (40.1 from open space, 1.7 from the community center/recreational area) of open space and recreational areas for

both active and passive uses, which would be adequate to meet the demand for parkland generated by residents of the Project.

Due to the amount and availability of open space within the Project Site, it is expected that the population generated from the Project would utilize on-site open space and the available recreational amenities to meet most recreational needs. Therefore, given the provision of on-site open space, recreational facilities, and other amenities, the Project residents would not be expected to cause or accelerate the substantial physical deterioration of existing neighborhood and community parks, nor would it cause the creation or physical alteration of a park.

Development of the Project would also include the provision of a new 0.26 acre (11,297 square foot) trailhead located off of Upland Road, along the southern boundary of the project site. The new trailhead site would provide 16 parking spaces (15 standard and one ADA compliant), along with picnicking facilities, landscaping, lighting and way-finding signage. In addition, the project applicant would adhere to Regulatory Compliance Measure 6.16-1, which would require the project applicant to pay associated Quimby Act development fees set by the city to the PVRPD. As explained previously, under the Quimby Act, a developer can pay development fees to compensate for the loss of land from a proposed development. These funds are collected to pay for park improvements, expansions, or conservation easements. With the implementation of Regulatory Compliance Measure 6.16-1, impacts would be reduced to less than significant.

Regulatory Compliance Measure

RCM 6.16-1: The project applicant shall pay the Quimby Act park facilities fee set by the City to the Pleasant Valley Recreation and Park District. The amount of the in-lieu fee would be determined according to the formula provided in the City of Camarillo Municipal Code.⁹

Transportation/Traffic

Potential Effects

Construction and operation of the Project would increase the amount of traffic in and out of the area, both on a temporary basis during Project construction and on a long-term basis during

⁹ City of Camarillo, *Municipal Code*, Sec. 18.30.050.

Project operation, these increases could cause potentially significant traffic, circulation, and access impacts.

Finding

The Project would not result in the decrease of level-of-service (LOS) conditions below LOS C during AM or PM peak hours to the existing circulation system within the City of Camarillo. Additionally, under buildout conditions of the City of Camarillo General Plan (General Plan), the Project will not significantly impact the studied intersections, as described in this section, and all of the intersections would continue to operate at LOS C conditions or better during AM and PM peak hours.

It is also important to note that the Traffic Study for the Project analyzed traffic impacts using a factor of 320 dwelling units. Currently, buildout of the Project would result in 300 dwelling units. Thus, the analysis in the Draft EIR is conservative by assuming 20 additional dwelling units than what is actually proposed, and impacts upon project implementation would be less than what is described in the section.

Implementation of the Project would not conflict with the City's measures of effectiveness for the performance of the circulation system. The Project will not conflict with CMP congestion control measures at any CMP intersection. No changes in traffic patterns are expected to result from project development. The Project would not substantially increase hazards due to a design feature or incompatible uses. The Project would provide adequate emergency access routes for egress and ingress onto the Project Site. The Project will not conflict with adopted policies, plans, or programs supporting alternative transportation. The Project would not cumulatively contribute to the traffic impacts upon General Plan buildout. Thus, the project would be considered less than significant on both a project and cumulative level.

Supporting Explanation

Potential traffic and transportation impacts are analyzed in Section 6.17 of the Draft EIR.

As analyzed in the Draft EIR, the study-area intersections under the proposed land use concept would operate at LOS C circulation conditions or better under future-plus-project conditions during PM peak hour circulation, which is acceptable based on the City of Camarillo's LOS C standard. The Project would therefore not generate any significant project-specific impacts during PM peak hour circulation.

The Project will also be subject to the City of Camarillo Traffic Mitigation Impact Fee Ordinance, as discussed above.¹⁰ Since the Project is located within District 2 of the Traffic Mitigation Impact Fee program, the Project will be required to pay into the fund, the appropriate impact fees for District 2. Paying into this Traffic Mitigation Impact Fee program will provide funding for the City of Camarillo to complete improvements to intersections and roadways throughout the City.

Therefore, implementation of the Project would not conflict with the City's measures of effectiveness for the performance of the circulation system, and impacts would be less than significant.

As analyzed in the Draft EIR, the Project would not contribute to a significant increase in traffic levels on the studied roadway segments or intersections as analyzed in the traffic study. The Project will contain its own circulation system within its boundaries, consisting of local residential streets and collector streets that will be connected to the circulation system of the City of Camarillo via Upland Road. The Project will not include or be required to provide any improvements to the local circulation system of the City of Camarillo outside the Project's boundaries. Therefore, since the Project under the three concepts will not conflict with Congestion Management Program (CMP) congestion control measures at any CMP intersection.

The Project will include the development of an internal circulation system that will consist of a two-lane roadway extending from Upland Road and several local streets that will provide access to the various residential clusters within the Project boundaries. All local streets will be developed in accordance with the City of Camarillo street development standards and will also be consistent in width and design with the City's standards. Therefore, the internal circulation system within the Project will not develop local streets that will include design features that could increase hazards; therefore, impacts would be less than significant.

The Project will also include the development of an intersection that will provide access onto the residential portion of the project site (a driveway along Upland Road that will be shared by the Padre Serra Parish). It is possible that this intersection could provide less than acceptable line-of-sight conditions for residents' ingress and egress onto and off of the project site from Upland Road. However, a sight distance analysis was conducted for the proposed driveway to the residential portion of the Project along Upland Road. The analysis indicated that the proposed driveway would be designed in a way that would provide corner sight lines in excess

¹⁰ *City of Camarillo Municipal Code*, Title 11 Vehicles and Traffic, Chapter 11.68 "Traffic Impact Mitigation Fees"

of the required 500-foot distance in both directions for residents entering the Project site and leaving the Project site (residential portion) and entering Upland Road. Therefore, since the Project would not substantially increase hazards due to a design feature or incompatible uses, impacts would be less than significant.

The analysis within the traffic report indicates that the driveway would operate in the LOS B range overall and LOS C or better on the minor street during both the AM and PM peak hours. Traffic volumes at the access driveway are expected to increase during short periods of time immediately before and after church-related activities at the Padre Serra Parish. Since these periods would not coincide with commute travel times, the access intersection to the Project is expected to continue to operate at acceptable LOS levels.

A traffic signal warrant analysis was completed for the proposed access intersection for the Project (refer to Appendix 6.17).

The signal warrant analysis indicates that the unsignalized intersection of Upland Road and the project driveway would operate acceptably under existing-plus-project and *General Plan* buildout-plus-project conditions. Since warrants are not likely to be met based on project traffic alone, installation of a traffic signal is not required. Because of potential traffic fluctuations associated with church activities, traffic conditions may be monitored and traffic signal warrants completed after buildout of the Project to evaluate the need for a traffic signal at the driveway entrance under project traffic plus church traffic conditions. Therefore, impacts would be less than significant.

The emergency access point to the proposed residential community would be provided via the existing St. John's Seminary access roadway, which extends from Upland Road, and would connect to the Project site's circulation system on the project site's northeast boundary. The existing roadway is 23 to 26 feet wide. A truck-turning analysis was conducted in the traffic report (refer to Appendix 6.17), which indicated that the driveway would accommodate a fire truck without encroaching into the opposing travel lane.

Under the St. John's Seminary Road Emergency Access Route the Project would be required to incorporate the following amenities to provide the proper type of emergency access road, according to the City of Camarillo and Ventura County Fire Department Guidelines:¹¹

¹¹ Notes from a meeting between the Ventura County Fire Department (at the Fire Department), John Dodd, Glen Pace, Dave Lauletta, Jasch Janowicz, and Jackie Lee, December 3, 2008.

- A gate would be provided at the Doheny Library that would serve as the emergency access point onto the Project site. The gate would need to automatically open and have a fail-safe power system and signage indicating that this route was for emergency purposes only. Residents of the Project would be allowed to exit only through this gate, but the Ventura County Fire Department would have full ingress and egress to the Project through this gate.
- Another gate has been considered acceptable by the Ventura County Fire Department at the T-intersection of the seminary road that goes south to the Major Seminary campus or north to the seminary college; or, instead of a gate, the access road should provide signage to direct traffic.
- “No Parking-Fire Lane” signs will need to be posted along the entire emergency access road through the St. John’s Seminary property.
- The St. John’s Seminary Road Emergency Access Route will need to meet the Ventura County Fire Department’s standard turning radius space of 40 feet.

The Ventura County Fire Department reviewed and approved the St. John’s Seminary Road Emergency Access Route in July 2015. Therefore, the Project would provide adequate emergency access routes for egress and ingress onto the Project. As a result, impacts would be less than significant.

The Project will provide for areas of trails that will connect pocket parks and view parks to various residential clusters within the Project. This will allow residents to walk, bike, or jog to parks within the Project boundaries, instead of use their vehicles to travel to the parks from their residence. Additionally, Upland Road to the south of the Project includes bicycle lanes that future residents of the Project will be able to access and use.

The Project does not include the development of bus turnouts. However, the closest transit bus stop (Camarillo Area Transit – CAT) to the Project is located approximately 0.75 mile to the west of the Project along East Los Posas Road in front of the Camarillo Library.

Furthermore, bike lane and sidewalk connections will be provided from the site’s internal circulation system to Upland Road, as the roadway is fully developed with Class II bike lanes. On-site circulation system will be designed pursuant to City of Camarillo collector roadway and residential roadway standards to accommodate all travel modes. Therefore, since the Project

will not conflict with adopted policies, plans, or programs supporting alternative transportation, impacts would be less than significant.

As analyzed in the Draft EIR, the General Plan buildout (cumulative) and Project analysis shows that the Project would not exceed any of the City of Camarillo's impact thresholds during the AM and PM peak hour under General Plan buildout conditions. While the intersection of Adolfo Road and Santa Rosa road would operate at LOS D during the AM peak hour, the Project would not increase the intersection's v/c ratio beyond the level caused by cumulative development. Therefore, the Project would not cumulatively contribute to the traffic impacts upon General Plan buildout; thus, the project would be considered cumulatively less than significant.

Tribal cultural Resources

Potential Effect

The construction and operation of the Project could result in increased demand for solid waste services and facilities that exceeds current capacity, thereby creating a significant impact.

Finding

In compliance with SB 18 and AB 52 the City of Camarillo sent out letters to three tribes in Ventura County, the Santa Ynez Band of Mission Indians, the Coastal Band of the Chumash Nation, and the Barbareno/Ventureno Band of Mission Indians, on September 7, 2016, notifying them of the Project. According to AB 52, the tribes had 30 days from the receipt of the letter to request consultation with the City of Camarillo.

A request for formal consultation was received via email by the City of Camarillo from Julie Tumamait-Stenslie, Chairperson of the Barbareno/Ventureno Band of Mission Indians. No other requests were received.

Ms. Tumamait-Stenslie requested that a Phase I Archaeological Survey be conducted for the project site. Two such surveys have been conducted for the project site (included in Appendix 6.5 of the Draft EIR), no artifacts of note were reported in either survey.

Given the lack of any noteworthy concerns regarding Tribal Cultural Resources (TCRs) by local tribal representatives, or any recorded artifacts of note being found on the Project Site, the Project is not expected to result in a substantial adverse change in the significance of TCRs, and this impact is considered less than significant.

Supporting Explanation

AB 52, which was approved in September 2014 and became effective on July 1, 2015, requires that CEQA lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a Project, if so requested by the tribe. A provision of the bill, chaptered in CEQA Section 21086.21, also specifies that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment.

Defined in Section 21074(a) of the Public Resources Code, TCRs are:

1. Sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources; or
 - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

TCRs are further defined under Section 21074 as follows:

- a. A cultural landscape that meets the criteria of subdivision (a) is a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape; and
- b. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a TCR if it conforms with the criteria of subdivision (a).

Mitigation measures for TCRs must be developed in consultation with the affected California Native American tribe pursuant to newly chaptered Section 21080.3.2, or according to Section

21084.3. Section 21084.3 identifies mitigation measures that include avoidance and preservation of TCRs and treating TRCs with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource.

As previously discussed under Environmental Setting the area of the project site is not known to contain any TCRs. As noted in the Section 6.5, Cultural Resources, with respect to archaeological resources and human remains that may be present in areas where there would be some ground disturbance, mitigation measures set forth in the section, including monitoring, would be implemented to ensure that should resources be encountered, they would be protected from damage. Therefore, while no TCRs are expected to be affected by the Project, the mitigation measures set forth in Section 6.5, Cultural Resources, would further ensure that any resources encountered would not be adversely affected.

Based on the above, the Project is not expected to result in a substantial adverse change in the significance of TCRs, and this impact is considered less than significant.

Utilities:

Water

Potential Effect

The Project will increase water demand at the Project Site, which could be considered a significant impact if sufficient additional water is not available to service the increase in demand caused by the Project, or if new infrastructure would be required to provide water for the Project.

Finding

Water service at the Project site would be provided by the Camrosa Water District (CWD). The most recent urban water management plan prepared by the district indicates that there are sufficient supplies of water available to supply current and projected demand for the district, including the Project. Therefore, impacts would be less than significant.

Supporting Explanation

Potential water supply impacts are analyzed in Section 6.18 of the Draft EIR.

Reliability is a measure of the anticipated capability of a water service system to manage water shortages. This assessment must include a comparison of the total projected water demand to the supply available during the following hydrologic conditions: (1) average water year, (2) single-dry water year, and (3) multiple-dry-year sequences. In its analysis of water supply reliability, the CWD 2015 UWMP Update concluded that water supplies are adequate to meet demand under all of the required hydrologic conditions through the planning horizon year of 2035.¹²

Under the three potable water supply and demand scenarios, imported water is limited to 7,900 acre feet per year (afy), an artificial constraint that may be exceeded if demand exceeds supply. For example, in the drought year of 1991, the district imported approximately 12,000 acre feet (af). Due to statewide reassessment of the Sacramento-San Joaquin Delta's overall health and sustainability, Metropolitan Water District has reduced the amount of water it will allow its constituent agencies to purchase. Thus, quantities expected to be imported for 2015 through 2035 are not expected to exceed 7,900 afy, even in the driest years.

The year 2020 is used as this is when the next UWMP would be prepared and when the construction of the Project would be completed. Due to the conscious effort on the part of the Camrosa to develop alternate water supplies in order to reduce dependence upon imported supplies, and the continued success of conservation efforts on the part of customers, Camrosa will likely stay well below this amount.

The Project's total water demands including open space and the residential component would increase total demand by less than two percent from project 2020 demand, and would consume 2.6 percent of the projected water surplus (8,509 afy). The projected water supplies of the Camrosa Water District are adequate to meet demand of the Project at buildout.

The Camrosa's 2015 UWMP Update foresees no difficulty meeting increased demand associated with growth in its service area through the 2035 planning horizon. Under each of the hydrologic conditions (i.e., normal water year, single dry year, and multiple dry years) the Camrosa analysis shows adequate supply to serve all users within its service boundary.¹³

There is currently a moratorium on the issuance of Water Availability and Water Will Serve letters for new development within the Camrosa Water District. Camrosa would issue a "water availability letter" which would indicate that potable water would be available to serve the

¹² Camrosa, *2015 UWMP*, (2015) 7-6.

¹³ Camrosa Water District, *Urban Water Management Plan*, (2015).

project within the Camrosa service area, but would not be a formal commitment to actually provide the water service.¹⁴

On June 27, 2012, under Resolution 12-14, the District made the moratorium permanent, requiring all new development to “bring with them” additional or “new” water supplies sufficient to offset project max-day demands.

In order to reconcile Camrosa’s permanent moratorium on new water connections with the need to supply the Project with potable water, the applicant and Camrosa Water District executed a Water Service Project Participation Agreement on December 30, 2016. The Agreement requires the applicant to participate in funding the construction of the Pleasant Valley Well Number 2 to offset the new water demand of the Project. The applicant’s participation in the Well Number 2 project would not only offset its own Project demand, it would also contribute directly to additional water supply for existing Camrosa water customers. Impacts would be less than significant.

Utilities:

Wastewater

Potential Effect

The Project is served by a regional, interconnected system of wastewater collection and treatment facilities, and the Project could potentially exceed the existing conveyance and treatment capacity of these facilities due to an increase in wastewater produced on-site.

Finding

The Project is located within the service boundary of the Camrosa Water District (CWD), the main provider of wastewater disposal service in the area. CWD currently does not provide wastewater services to the project site. Project demand for wastewater service could be met by current CWD facilities, and impacts would thus be less than significant.

Supporting Explanation

Potential wastewater impacts are analyzed in Section 6.19 of the Draft EIR.

¹⁴ Telecommunication with Mr. Terry Curson, Engineer, Camrosa Water District, February 8, 2012.

The Project would not exceed the wastewater treatment requirements of the applicable RWQCB. The Project consists of a senior citizen housing development of 300 residential units on approximately 45 acres of an 88.45 acres site. Project implementation would result in wastewater generation connections to the existing CWD wastewater systems that are in place. It is not anticipated that the Project would result in wastewater generation in excess of currently CWD-system capacity; therefore, no new facilities would need to be constructed.¹⁵ Accordingly, the project would not exceed wastewater treatment requirements of the Los Angeles RWQCB and impacts would be less than significant.

CWD operates one water reclamation facility (WRF) located at 1900 South Lewis Road. The Project would connect to an existing 8-inch sewer line across Upland Road at Hillridge Drive, which would require an approximately 1,200-foot extension of the Project's sewer line. The existing 8-inch main would convey project wastewater to the CWD WRF, which has a design capacity of 1.5 mgd and existing average daily flows of 1.4 mgd.

A sewer study¹⁶ was prepared to determine the Project's sewer generation loads and the potential impact on the existing sewer conveyance system. This sewer study analyzed two scenarios for the Project, a 260-unit medium-density scenario, and a 338-unit high-density scenario. Based on the analysis, the medium and high-density scenarios generated a sewer load of 69,608 gpd and 86,080 gpd, respectively.

As discussed in the Draft EIR, the wastewater generated by the currently Project would be less than the sewer load analyzed in the sewer study and less than the WRF's remaining capacity of 0.1 mgd (100,000 gpd). Wastewater generated by the Project would, therefore, be able to be accommodated by the current capacity of the WRF. Impacts would be less than significant.

The Project would connect to an existing 8-inch sewer line which currently serves residences in the Hillridge Drive area. As described above, a sewer study was prepared to determine the Project's potential impact on the existing sewer conveyance system. For a conservative analysis the sewer study analyzed the flattest pipeline sections within the existing CWD sewer system, which are the most constrictive portions of the gravity sewer system, for the anticipated peak flow.¹⁷ The CWD design constraint for peak flow of sewer pipes less than 12-inches in diameter is half capacity. The CWD design constraint for peak flow of sewer pipes greater than 12-inches

¹⁵ Penfield & Smith, *St. John's Seminary Sewer Study*, (2010) 3.

¹⁶ Penfield & Smith, *St. John's Seminary Sewer Study*, August 2010.

¹⁷ Penfield & Smith, *Sewer Study*, (2010) 2.

in diameter is two-thirds capacity. The two scenarios presented in the sewer study resulted in a larger generation load on the existing CWD system than those calculated by the Project.

The sewer study analysis of the highest peak flow sewer rates (86,080 gpd) indicates that, with the exception of two 8-inch pipes in Hillridge Drive, all affected sewer lines would remain within the CWD design constraints. The two 8-inch lines that exceed the design constraint requirement exceed the requirement by 0.6 percent and 2.2 percent, respectively. The study concluded that the amount of excess capacity at peak flow for the 8-inch pipes is negligible and that implementation of the project would be within the realm of acceptable engineering principles. The sewer study recommends that no improvements to the existing collection system would be required.¹⁸

The Project would result in less generation of sewer loads on the existing system than those analyzed in the sewer study. Consequently, the recommendation would remain the same and no improvements to the existing collection system would be required. Impacts would therefore be less than significant.

The Project would need to extend a sewer line approximately 1,200 feet from the primary entrance east and then south to connect with the existing sewer line within Hillridge Drive. The elevation increases approximately 20 feet from the primary entrance to the existing sewer line in Hillridge Drive. The elevation change would not allow flow to naturally be feed by gravity. As a result, the Project would construct a pump station west of the primary entrance to move wastewater under pressure to the Hillridge Drive connection point to begin gravity feed flow of wastewater. The future pump station would be dedicated to CWD for operation and maintenance. As a result, potential impacts to the sewer conveyance system would be less than significant.

Cumulative projects located within the CWD wastewater service boundary would generate wastewater that would be conveyed to the WRF. Analysis was conducted using CWD wastewater generation and equivalent dwelling units (EDU) factors to estimate the wastewater generation of the related projects. Related projects are estimated to generate approximately 278,933 gpd of wastewater at buildout. However, not all related projects are located within the sewer service areas of Camarillo. Therefore, wastewater generation from most related projects would be diverted to other respective agencies and would not be cumulatively considerable for impacts to CWD. Furthermore, all projects would follow local protocol, as did the Project, in

¹⁸ Penfield & Smith, *Sewer Study* (2010), 3.

coordinating with respective water reclamation agencies for a sewer availability analysis before project approval. Any associated city fees or fees for the improvement of existing sewer infrastructure to help accommodate additional wastewater shall be paid by the project applicant before implementation. Therefore, cumulative impacts would be less than significant.

E.2 Findings Regarding Impacts Analyzed in the EIR and Determined to be Significant but Mitigated to Less Than Significant

This section includes Findings for project impacts which are potentially significant, but which are mitigated to a less than significant level with the imposition of mitigation measures. The City Council finds that all potentially significant impacts of this Project listed below can and will be substantially lessened or avoided by imposition of mitigation measures. Specific Findings of the City Council for each impact are set forth below in this section.

The City hereby finds that the following potential environmental impacts can and will be mitigated to below a level of significance, with implementation of the mitigation measures recommended in the EIR.

Air Quality

Potential Effects

The Project could have potential impacts on regional and local air quality from construction and long-term operation of the Project. Exposure of sensitive receptors could result from substantial pollutant concentrations. Construction and operation of the Project could conflict with applicable air quality plans, policies, or regulations.

Finding

Development of the Project would result in air pollutant emissions during construction and operation. The Project would result in significant but mitigable impacts during construction for reactive organic gases (ROC), oxides of nitrogen (NO_x), carbon monoxide (CO), and oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). Implementation of the operational features and mitigation measures described in the Draft EIR would reduce impacts to a less than significant level. The Project would result in less than significant health impacts to nearby sensitive receptors and would not expose sensitive receptors to substantial sources of pollutants or odors. Project implementation would generate

cumulative impacts for ROC and NO_x; however, these impacts would be mitigated to a less than significant level.

Supporting Explanation

The proposed residential land use will neither conflict with the VCAPCD's 2007 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2012 RTP/SCS are largely built off local growth forecasts from local governments like the City of Camarillo. The 2012 RTP/SCS accommodates up to 72,200 persons; 27,500 households; and 37,800 jobs in the City of Camarillo by 2020.¹⁹²⁰

The Project would develop 300 residential units in the City of Camarillo. The Project could add 788 residents to the Plan area, based on the City's projected household density from SCAG's RTP (a conservative estimate). This would increase population in the South Central Coast Air Basin and represent about 10.2 percent of projected population growth in the City from 2008 to 2020 in the RTP and 9.7 percent of housing growth during that same period. The Project site's zoning and designation in the General Plan would be amended to accommodate such growth. Per Chapter 20.01 of the City's Municipal Code, the Project would have to be consistent with the population growth assumptions by the City in order to receive building permits. The proposed phasing of development over the 38-month period is intended to ensure the project is consistent with the 2007 AQMP. As such, the project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

The VCAPCD's Air Quality Assessment Guidelines state that "construction-related emissions...of ROC and NO_x are not counted toward the two significance thresholds, since these emissions are temporary." However, the Guidelines also indicate that construction-related emissions be mitigated if estimates of ROC and NO_x emissions from the heavy-duty construction equipment exceed 25 pounds per day of ROC or NO_x emissions.

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using assumptions from the project's

¹⁹ While SCAG adopted the 2016 RTP/SCS in April 2016, the updated RTP has not been formally included in the region's adopted 2007 AQMP.

²⁰ The VCAPCD's 2016 AQMD was not adopted until February 2017. The NOP for this St. John's Seminary Residential Community Draft EIR was submitted in July of 2016, which predates the adoption of the 2016 AQMD.

developer, including the project's construction schedule of 38 months. The initial work on the "Major Land Development" phase would include existing building demolition, rough grading for the entire project site, utilities trenching, and construction of the Building & Rec Center, a roughly 18-month period. After this initial work, the project's 300 residences would be built over 20 phases. Each phase would involve construction of 15 dwelling units and would generally involve the same phases of utility work, fine grading, building construction, paving, and architectural coatings. The "typical" construction schedule for each of the 20 phases was modeled for air quality impacts. Each phase of housing development runs about 5.5 months from the start of utility connections to the utilities stubs to completion of each phase until the conclusion of construction in late 2021. As such, each new phase would overlap partially with up to six previous phases. As a result, the analysis of each phase accounts for this constant transition of construction from one phase to the next.

The construction of the Project will produce ROC and NO_x emissions that exceed the VCAPCD's thresholds of significance throughout the duration of construction activities, in part because of the phased nature of the construction plan. However, it should be noted that the VCAPCD states that construction-related emissions are not evaluated against any numeric threshold for significance, since such emissions are temporary.

There are up to seven homebuilding phases that could occur simultaneously throughout the project site that could contribute to ozone precursor emissions. As a result, construction of the Project would contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered significant but mitigable.

Mitigation Measures 6.3-1 and 6.3-2 call for the use of readily-available construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related ROC and NO_x emissions. Regulatory Compliance Measure RCM 6.3-1 addresses fugitive dust emissions of PM₁₀ and PM_{2.5} that would be regulated by VCAPCD Rule 55, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that the analysis conservatively did not factor in the application of BACMs to control fugitive dust. Implementation of Mitigation Measures 6.3-1 and 6.3-2, combined with Measure RCM 6.3-1, would reduce on-site ROC, NO_x, PM₁₀ and PM_{2.5} emissions during the construction process. Pursuant to VCAPCD guidance, implementation of all feasible mitigation measures during the construction process is required for projects that exceed the thresholds of significance for ozone precursor emissions. As noted earlier, the VCAPCD states that construction-related emissions are not evaluated against any numeric threshold for significance, since such emissions are

temporary.²¹ Instead, application of feasible mitigation measures is required. Since this analysis identifies all such feasible measures, construction of the Project would result in temporary impacts to ozone levels that are considered less than significant after mitigation.

The project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 2,080 net vehicle trips to and from the project site on a peak weekday at the start of operations in 2021.²² Operational emissions would not exceed VCAPCD's significance thresholds for ROC and NO_x (Table 6.3-10). As a result, the Project's operational impacts on air quality are considered less than significant.

A project's construction impacts could be considered cumulative considerable if it substantially contributes to cumulative air quality violations when considering other projects that may undertake concurrent construction activities.

Construction of the Project would contribute significantly to cumulative emissions of ozone precursors. For regional ozone precursors, the project would exceed VCAPCD mass emission thresholds for ozone precursors during construction. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered significant.

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the project's air quality impacts would not exceed the VCAPCD's operational thresholds of significance, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant.

Mitigation Measure 6.3-1 would require the use of cleaner off-road construction equipment. Regulatory Compliance Measure 6.3-1 calls for good housekeeping measures that reduce ROC and NO_x emissions during on-site construction activities. These could similarly be implemented at other construction sites for any related projects. Following the implementation of these measures, impacts would be less than significant.

Mitigation Measures

²¹ Ventura County Air Pollution Control District, "Ventura County Air Quality Assessment Guidelines," Page 5-3. October 2003.

²² Stantec, "St. John's Seminary Residential Project Traffic and Circulation Study", July 21, 2016.

- MM 6.3-1** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce ROC, NO_x, PM₁₀, and PM_{2.5} emissions at the project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB to the maximum feasible extent. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or VCAPCD operating permit shall be provided.
- MM 6.3-2** Where possible, require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.

Regulatory Compliance Measures

- RCM 6.3-1** Construction activities shall comply with VCAPCD Rule 55, including the following measures:
- Apply water to disturbed areas of the site three times a day
 - Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
 - Limit soil disturbance to the amounts analyzed in this air quality analysis.
 - All materials transported off-site shall be securely covered.
 - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).

- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

Biological Resources

Potential Effect

The Project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). The Project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local regional plans, policies, regulations, or by the CDFW or the USFWS, or have a substantial adverse effect on federally protected wetland as defined by Section 404 of the Clean Water Act. The Project could substantially interfere with the movement of native fish or wildlife or migratory wildlife corridors, or conflict with local policies or ordinance or a Habitat Conservation plan intended to protect biological resources.

Finding

The primary plant community occupying the project site is orchard. Eucalyptus tree windrows, ornamental landscaping, and disturbed/ruderal areas comprise the remaining areas. No federally or state-listed, or other special-status plant or wildlife species were observed on the project site during several site the surveys. Based on the suitability of the habitat on the site, the site's proximity to suitable habitat, and historic occurrences in the region, six special-status wildlife species have the potential to occur on the site. However, due to the disturbed nature of the site, the majority of these species would be expected to occur only as transients.

It is possible that native bird species may utilize the trees, landscaping, or other areas on the site to nest during the breeding season, which generally occurs March through August. If construction were to take place during breeding season, impacts to these nesting birds, their eggs, or young could be considered significant. Nighttime light can disturb breeding and foraging behavior of nocturnal birds, mammals, and invertebrates, which may be considered a significant impact.

A total of four coast live oak trees, considered a sensitive resource by the City of Camarillo, occur within the project site. If these trees were removed during the course of construction on the project site, it may be considered a significant impact.

With implementation of the mitigation measures identified by the Draft EIR as well as the Project's conditions of approval, potential impacts to biological resources would be reduced to a less than significant level during construction and operation of the Project.

Supporting Explanation

Potential biological resource impacts are discussed in Section 6.4 of the Draft EIR.

Suitable habitat for the permanent support of special-status plant species does not occur within the Project Site boundary and no special-status plants were observed during any of the site surveys.

Special-Status Animal Species

Due to the absence of native habitat on the Project site, the potential for the presence of the majority of special-status animal species is greatly reduced. However, as discussed in the Special-Status Wildlife Species subsection of the Draft EIR, a few species may occur on the site in a transitory manner. In the event that are special-status species were present within the work area during construction, impacts to them would be potentially significant.

The monarch butterfly is the only special-status wildlife species that may be expected to utilize the on-site habitat, as it is known to overwinter in eucalyptus trees and its occurrence has been recorded in the region. Removal of eucalyptus trees containing a flock of overwintering monarch butterflies would result in a significant impact to this species. However, the majority of the eucalyptus windrows on the project site are proposed to remain in place, and overwintering monarchs have not been recorded on the project site.

Nesting Birds

It is possible that native bird species may utilize the trees, landscaping, or other areas on the site to nest during the breeding season, which generally takes place March through August. If construction were to take place during breeding season, impacts to these nesting birds, their eggs, or young would be considered potentially significant.

Implementation of the project could cause indirect impacts to adjacent native habitats as a result of the increased human and domestic and feral animal presence associated with the residential development of the site. Increased human activity, such as recreational usage (i.e., hiking), in this area would potentially cause the degradation of the habitat. Recreational usage, maintenance, and domestic animals could result in nest abandonment; trampling of ground-

dwelling flora and fauna; compaction of soils; increased amount of refuse and pollutants in the area; and displacement of wildlife species due to noise and nearby activities. Increased human presence could also result in increased food sources (e.g., trash, pet food, and fallen fruit) that may attract non-native animals and more urban-adapted species to the site. In addition, the potential for accidental fire is greater with increased human presence. These impacts are potentially significant.

The implementation of the Project also will likely increase the number of nighttime light and glare sources on the site. Light and glare can spill over into adjacent open space areas, thereby increasing the level of light currently experienced there. Nighttime illumination is known to adversely affect some species of animals in natural areas. Nighttime light can disturb breeding and foraging behavior, as well as potentially alter foraging and breeding behavior of nocturnal birds, mammals, and invertebrates. This is considered a potentially significant impact.

However, following the implementation of Mitigation Measures 6.4-1 through 6.4-6, potential impacts to special-status plant or wildlife species would be less than significant.

No riparian habitat occurs on the Project Site, and none of the plant communities identified and mapped on the project site are listed as sensitive communities by the CDFW or the US Fish and Wildlife Service. Therefore, no impacts to would result.

The Project would permanently impact approximately 0.38 acre of non-wetland waters of the U.S. consisting entirely of concrete v-ditch. Approximately 1,641 linear feet would be converted to a 54-inch underground storm drain pipe and will outlet to an approximately 636-linear foot restored earthen channel. Since the proposed design will allow for continued conveyance of water through the site to downstream waters, and because the Project will restore 636 linear feet of channel of onsite receiving waters from existing concrete v-ditch to earthen channel, the project will maintain onsite functions and values of waters of the U.S. As such, a 300-linear foot waiver request will be submitted to USACE to request authorization under Section 404 Nationwide Permit 29. If the request is not granted, a Section 404 individual permit will be required.

Language from NWP 29 published in the Federal Register states:

*“The discharge must not cause the loss of greater than 1/2-acre of non-tidal waters of the United States. The discharge must not cause the loss of more than 300 linear feet of stream bed, **unless for intermittent and ephemeral stream beds the district engineer waives the 300 linear***

foot limit by making a written determination concluding that the discharge will result in no more than minimal adverse environmental effects."

As such, usage of the site as a residential development will not significantly alter the function of the jurisdictional resources on the site. Impacts would be less than significant.

Wildlife movement corridors are landscape elements that serve as linkages between natural areas, thereby facilitating wildlife movement between habitats. Because the Project Site has been historically developed, utilized, and maintained for agricultural and educational purposes, and it is separated from large open space areas by housing development and more agriculture, migration or movement of wildlife species to and from large open space areas in the region is not expected to occur through the site. Therefore, no impacts would occur.

Though the City of Camarillo does not have a formal tree protection ordinance, it does have an unwritten policy that considers native trees a sensitive resource. As noted in the Protected Trees subsection of the Draft EIR, there are four native coast live oak trees present on the Project Site. The applicant plans to relocate and incorporate these trees into the Project's landscape plans; therefore, the impact would be less than significant.

There is no habitat conservation plan in place or proposed for this region. Therefore, no impacts to such a plan would occur as a result of construction or operation of the Project.

Mitigation Measures

MM 6.4-1: When grading occurs in areas that may contain sensitive biological resources, a City-approved biologist shall be present to monitor grading activities to provide confirmation on presence or absence of sensitive species in the vicinity (at least 300 feet around the project site).

If sensitive species are encountered, species-specific measures shall be prepared by a City-approved biologist in consultation with the CDFW and implemented to prevent any harm to the species.

MM 6.4-2: To prevent potential impacts to special-status animal species during the implementation of the proposed project, a wildlife survey will be conducted prior to the start of construction and/or demolition. In the event that any special-status species are encountered, they will be relocated to the native habitat on the

banks of Calleguas Creek. The construction fencing will also serve to exclude wildlife from the project site once construction has begun.

MM 6.4-3: To prevent potential impacts to overwintering flocks of monarch butterflies that may occur in the eucalyptus trees of the windrows on and surrounding the project site, eucalyptus trees proposed for removal will be surveyed prior to such action and prior to the start of construction and/or demolition. If a tree is occupied by a concentration of overwintering monarch butterflies, that tree, and any other eucalyptus trees within 100 feet, will be avoided until such time that the butterflies have migrated off the project site.

MM 6.4-4: To prevent potential impacts to nesting birds occupying the proposed project site during the breeding season from the months of March through August, construction, demolition, or site-preparation activities will not take place during this time when feasible.

If postponement of construction until after the breeding season is not possible, the applicant shall have a field survey conducted by a qualified biologist to determine if active nests are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. In accordance with USACE and CDFW permit requirements, the field survey shall be conducted no earlier than 45 days and no later than seven days prior to construction or site-preparation activities that would occur during this period. If active nests are found, a minimum 50-foot fenced barrier shall be erected around the nest site (the buffer may be greater or lesser, depending on the bird species and construction activity, as determined by the biologist). Clearing and construction within the buffer area shall be postponed or halted, at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. The biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

MM 6.4-5: Prior to occupancy, a public awareness program shall be developed to prevent unleashed domestic animals from entering open space areas adjacent to the project site. This program must include promoting public education and awareness of the local biological resources and their sensitivity. The applicant and/or its contractor shall be responsible for the development of the public

awareness program as well as installation of interpretive signs and fencing. The homeowners association (HOA), or an acceptable land manager/agency as approved by the City of Camarillo, must be responsible for maintaining this program, including signs and fencing.

In addition, the public awareness program shall advise homeowners to avoid over-irrigating to reduce the spread of non-native Argentine ants from driveways, curbs, gutters, and garden's edges along homes into outlying open spaces. The public awareness program shall advise homeowners regarding limiting the use of rodenticides, and provide information regarding wildlife friendly exclusionary devices/options if homeowners develop problems with wildlife. The public awareness program shall include information regarding non-native invasive plants. Homeowners should be advised to visit the California Invasive Plant Council Web Page (CAL-I PC: <http://cal-ipc.org/ip/inventory/>) for a list of plants and other information, including family activities focused on non-native plant events.

MM 6.4-6: All lighting along the perimeter of natural areas shall be downcast luminaries, shielded and oriented in a manner that will prevent spillage or glare into the open space areas of Calleguas Creek. The City of Camarillo shall approve final lighting orientation and design. All proposed lighting shall be consistent with City policies. It is recommended that any security lighting be controlled by motion detectors.

Cultural Resources

Archeological Resources

Potential Effect

During the construction phases, implementation of the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Finding:

While no archaeological resources have been identified on the Project Site to be impacted by the proposed new development, there remains the possibility of encountering buried resources during excavations. However, with implementation of the mitigation measures identified in the

Draft EIR, potential archaeological resource impacts from the Project would be reduced to a less than significant level.

Supporting Explanation

The Project would redevelop the area into a senior citizen residential community. The proposed redevelopment would result in the demolition of the existing St John's Seminary College buildings, and the regrading of the project site. The redevelopment of the project site could result in the loss of previously unknown archaeological resources during the construction and grading activities. As described previously, potential archaeological resources were identified within the perimeter of the Project Site east of the Doheny Library. During the Phase I²³ and Phase II²⁴ surveys, the site was found to have a relatively small, low-density, disturbed surface lithic scatter. The fieldwork at the site resulted in the recovery of a scientifically consequential sample of artifacts and archaeological indicators and was determined to be clear of any additional artifacts.²⁵

However, since there is the potential for adverse impacts related to the discovery of additional, previously unknown archeological resources during the grading of the project site, Mitigation Measure would be implemented to reduce this impact to less than significant.

The emergency access route was surveyed as part of the Phase I/II survey for the project site. An identified archaeological resource site is located directly adjacent to this driveway within the St. John's Seminary site but outside of the area proposed for residential development. This site consists of a large habitation site with a weak midden deposit. Resources within this area most likely date to the Middle Period. However, use of the existing driveway for the emergency access route would not require widening of the roadbed and no encroachment into the identified archaeological resource site would occur; impacts would be less than significant.

MM 6.5-2 The City of Camarillo shall note on any plans that require ground disturbing excavation that there is a potential for exposing buried cultural resources, including prehistoric Native American burials.

The project applicant shall inform representatives of the three Native American tribes present in Ventura County of the project construction schedule and allow

²³ Phase I Archaeological Survey for St. John's, W & S Consultants, 2008

²⁴ Phase II Test Excavation and Determination of Significance, W & S Consultants, 2008

²⁵ Phase II Test Excavation and Determination of Significance, W & S Consultants, 2008.

for a tribal monitor to be present at the project site during grading activities in native soil.

The Project Applicant shall retain a Professional Archaeologist to provide a pre-construction briefing to supervisory personnel of the excavation contractor to alert them to the possibility of exposing significant prehistoric archaeological resources within the project site. The briefing shall discuss any archaeological objects that could be exposed, the need to stop excavation at the discovery, and the procedures to follow regarding discovery protection and notification of the project applicant and archaeological team. The Professional Archaeologist shall develop and distribute for job site posting an "ALERT SHEET" summarizing potential find types and the protocols to be followed as well as points of contact to alert in the event of a discovery. The tribal monitor will be provided an opportunity to attend the pre-construction briefing.

The Professional Archaeologist shall be available on an "on-call" basis during ground disturbing construction in native soil to review, identify and evaluate cultural resources that may be inadvertently exposed during construction. The Archaeologist shall temporarily divert, redirect, or halt ground disturbance activities at a potential discovery to allow the identification, review and evaluation of a discovery to determine if it is a historical resource(s) and/or unique archaeological resource(s) under CEQA.

If the Professional Archaeologist determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource, he/she shall notify the project applicant and other appropriate parties of the evaluation and recommend mitigation measures to mitigate to a less-than significant impact in accordance with California Public Resources Code Section 15064.5. Mitigation measures may include avoidance, preservation in-place, recordation, additional archaeological testing and data recovery among other options. Contingency funding and a time allotment sufficient for recovering an archeological sample or to employ an avoidance measure may be required. The completion of a formal Archaeological Monitoring Plan (AMP) may be recommended by the archaeologist if significant archaeological deposits are exposed during ground disturbing construction. Development and implementation of the AMP will be determined by the City of Camarillo and

treatment of any significant cultural resources shall be undertaken with the approval of the project applicant and the City.

A Monitoring Closure Report shall be filed with the City of Camarillo at the conclusion of ground disturbing construction if archaeological resources were encountered and/or recovered.

Cultural Resources

Paleontological Resources

Potential Effect

During the construction phases, implementation of the Project could directly or indirectly destroy a unique paleontological resources or site or unique geologic feature.

Finding:

While no paleontological resources have been identified on the Project Site, there remains the possibility of encountering buried resources during excavations. However, with implementation of the mitigation measures identified in the Draft EIR, potential paleontological resource impacts from the Project would be reduced to a less than significant level.

Supporting Explanation

Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and the accompanying geologic strata. Paleontological resources are more likely to occur at sites with little surface or subsurface disturbance and within sedimentary or metamorphic rock. Locally, the geologic units consist of surficial deposits (various ages of alluvium/stream channel deposits) and bedrock formations. The upper soil layers have been heavily disturbed by both agricultural operations and construction of the Seminary College buildings and swimming pool. Given this disturbance and the nature of the underlying soils, the potential for fossils to occur beneath the project site within the depth of disturbance is considered low.

Adverse impacts on paleontological resources result when rock units become unavailable for study and observation by scientists. The destruction of fossils as a result of human-induced ground disturbance has a significant impact as it makes biological records of ancient life permanently unavailable for study. The implementation of the Project would require extensive

grading of the project site. This would have the potential to uncover previously unidentified paleontological resources. Therefore, despite the low the potential for discovering any fossil or paleontological resources, impacts would be potentially significant.

However, following the implementation of Mitigation Measure 6.5-4 if needed, impacts would be reduced to less than significant.

The emergency access route would not require the widening of the existing paved roads adjacent to existing agricultural land and the Doheny Library; impacts would be less than significant.

MM 6.5-4 In the event that paleontological resources are unearthed during project construction on the proposed project, all earth-disturbing work within the vicinity of the find shall be temporarily suspended until a qualified paleontologist has evaluated the nature and significance of the find.

Cultural Resources – Human Remains

Potential Effect

During the construction phases, implementation of the Project could potentially disturb human remains, including those interred outside of formal cemeteries.

Finding:

There are no known cemeteries or burial grounds on the project site. As previously discussed, the site has a history of use by Native Americans; therefore, there is potential for additional archaeological resources, including burial grounds, to exist. However, the potential to uncover previously unknown formal cemeteries or human remains is considered remote. However, because the potential exists for human remains to be unearthed during earthwork and grading for the Project, impacts are potentially significant. Following the implementation of Mitigation Measure 6.5-5, impacts would be less than significant.

The emergency access route not require the widening of the existing paved roads adjacent to existing agricultural land and the Doheny Library; impacts would be less than significant.

Mitigation Measures

MM 6.5-5 If human remains are encountered during a public or private construction (earthmoving) activity, State Health and Safety Code 7050.5 states that no further disturbance shall occur until the Ventura County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The Ventura County Coroner must be notified within 24 hours.

If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) must be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis.

Upon clearance by the coroner and the NAHC for Native American remains, construction (earthmoving) activities may resume.

Hydrology and Water Quality

Potential Effect

The Project's associated construction activities could significantly impact the quality of the groundwater and/or storm water runoff to the storm water conveyance system and/or receiving water bodies due to surface runoff from the Project during construction. The Project's post-development activities could potentially degrade the quality of storm water runoff. Post-development non-storm water discharges could contribute potential pollutants to the storm water conveyance system and/or receiving bodies. All of these potential effects require NPDES permit compliance.

Finding

The Project would include infrastructure to be developed in accordance with the current drainage patterns found on the Project Site. Construction related impacts to water quality and erosion would be less than significant as the Project would be required to implement a storm water pollution prevention plan and related best management practices. Surface water, which may potentially increase, would be detained and infiltrated on site per Ventura County standards, and the required stormwater quality design volume mitigated to meet the current Los Angeles Regional Water Quality Control Board water discharge requirements. The potential

impacts to the watershed stormwater-runoff peak flow rates and volumes for a range of storm event return probabilities would be less than significant.

Supporting Explanation

Hydrology and Water Quality impacts are discussed in Section 6.9 of the Draft EIR and analyzed in the Project's Hydrology Report(s) included as Appendix 6.9 of the Draft EIR.

The Project consists of 300 senior citizen residential units, recreational uses, and open space. The proposed residential development site is currently located outside of the 100-year floodplain and the dam inundation zone. Therefore, no people or structures would be exposed to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. Further, the Project Site is not located in an area that would be inundated by seiche or tsunami, and construction techniques and management practices would minimize the chance of mudflows. Therefore no impacts could occur with respect to these impacts as the result of the Project.

The Ventura County Watershed Protection District (VCWPD) *Design Hydrology Manual*²⁶ provides detailed guidelines and procedures for performing hydrologic investigations. Hydrologic soil group and rainfall intensity zones were determined using geographic information systems (GIS) shapefiles, which were available from VCWPD. Watershed areas, slopes, and flowpaths were assumed by examining the existing topography and the proposed land use plans. All runoff calculations were determined using VCWPD programs Time of Concentration Calculator (VenturaTcCalc) and the VCRat model.²⁷ Runoff hydrographs were developed for existing and proposed conditions up to a 100-yr storm event frequency.

The VCWPD TcCalc and VCRat programs were used to analyze surface water runoff conditions for the Project Site conditions during 10-year, 25-year, 50-year, and 100-year storm events. The drainage facilities for the Project will feature an integrated system that incorporates stormwater management with water quality treatment consistent with the Ventura County 2011 Technical Guidance Manual (TGM). The conveyance and treatment of runoff would be accomplished through curb-and-gutters, catch basin inlets and laterals, an open channel, and infiltration combination basin sized to accommodate both detention and retention volumes, with a hydrodynamic separation device and connector pipe screen (CPS) for pre-treatment of runoff.

²⁶ Ventura County Watershed Protection District, Ventura County, California, Hydrology Manual, Updated December 2010.

²⁷ Encompass Consultant Group. *Preliminary Drainage Study St. John's Seminary Residential Development Project*. 2016.

The flood control planning zone would contain features designed to handle stormwater runoff. The following components summarize the general concept of the site drainage and the proposed measures to address the local and regional requirements:

- The existing asphalt lined channel (St. John's Drain), running approximately 2,277 linear feet through the entire project site, will be realigned and reconstructed using 54-inch reinforced concrete pipe. This will prevent contamination by off-site run-on originating from the existing detention/debris basin on the easterly property boundary, and will eliminate the need for treatment of this water. Runoff generated on-site will be introduced into St. John's Drain only after filtration has occurred.
- Runoff would be collected into storm drain lines or discharged into the open channel and conveyed through pre-treatment BMPs prior to the infiltration/detention basin. After peak flow and stormwater quality mitigation runoff can be discharged into the St. John's Drain and into Calleguas Creek.
- The impact of the development on the Calleguas Creek will be minimized through the implementation of the infiltration/detention basins. Preliminary calculations determined that the minimum basin capacity required 112,639 cubic feet (cu ft) of storage space to accommodate both the detention and retention volumes. However, the proposed basin dimensions provided in this report allows for a conservative amount of on-site storage capacity of 245,000 cu ft.
- The required pretreatment of runoff is addressed through a hydrodynamic separation device located upstream of the basin. A flow restrictor will limit the discharge of runoff to match pre-developed conditions, with excess flows detained in the infiltration basin. In addition, a flow splitter structure further upstream will divert the required stormwater quality design flow into the basin for infiltration, while allowing larger flows to bypass and continue into the flow restrictor structure.
- The project site's overall drainage pattern flows from the higher elevations in the northeasterly region of the site to the lower elevations in the southwest. Surface runoff will be collected and conveyed through an earthen channel along the main road, acting as the backbone of the proposed storm drainage system. Runoff from the development area located behind the natural slopes north of Padre Serra Church will be directed into a pipe culvert under the road and into the downstream end of the channel. Pretreatment will be achieved through the hydrodynamic separation device previously mentioned.

- The area encompassing the southwesterly corner of the site will not be able to drain into the infiltration basin due to the lower elevation of the discharge point. Therefore, treatment of runoff from this area will be addressed through the implementation of flow-based biofiltration BMPs, such as a cartridge media filter. Because of the proximity of an existing well and the soil type of the area, the construction of an additional basin is not technically feasible. Therefore, the detention volume required for this drainage subarea is accounted for in the 245,000 cu ft infiltration basin.
- There is no proposed development for the area directly adjacent to the existing off-site detention/debris basin. This area will not require any treatment or detention. Runoff originating from this area will be conveyed through the reconstructed St. John's Drain.

The post-construction BMP proposed for the project would be an infiltration basin as described in the 2011 TGM. The basin would be laid out in an off-line configuration and a flow control device would be installed to divert the treatment flows through a lateral into the detention/retention basin. Larger flows would bypass the lateral and continue on and into a downstream structure that limits the runoff discharged off site to the 10-year predevelopment peak, with excess flows directed into the basin.

The implementation of additional BMPs such as biofiltration and/or treatment control measures, for redundancy in the mitigation of storm water pollutants and pretreatment for the proposed infiltration basin, is recommended by the 2011 TGM. Taking these proactive steps would allow for the use of a lower safety factor in the basin. Consequently, this would help increase the maximum ponding depth allowed and minimize the area of the infiltration basin.

The required pretreatment of runoff would be addressed through a hydrodynamic separation device located upstream of the detention/retention basin. A flow restrictor would limit the discharge of runoff to match pre-developed conditions for a 10-year storm event, with excess flows being detained in the infiltration basin. In addition, a flow splitter structure further upstream would divert the required stormwater quality design flow into the basin for infiltration, while allowing larger flows to bypass and continue into the flow restrictor structure.

Preliminary calculations determined that the minimum basin capacity required 244,921 cubic feet (cf) of storage space to accommodate both the detention and retention volumes. The area designated as the flood control planning zone would allow for on-site storage capacity of 245,000 cf. The stormwater quality design volume (SQDV) to be retained is 79,199 cubic feet.

As previously discussed, dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities (Construction General Permit Order 2009-0009-DWQ, as amended by Order 2012-006-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

Development of the proposed storm water control structures would disturb an acre or more of land over the course of construction. Therefore, the Project applicant would be required to obtain a General Permit for discharges of storm water associated with construction activity. The General Permit requires an SWPPP which identifies potential sources of pollution and specifies runoff controls, or BMPs, during construction to minimize the discharge of pollutants in stormwater from the construction area. In addition, the SWPPP must identify post-construction control measures and a monitoring plan. Consequently, the construction phase of the Project would result in less than significant surface water quality and groundwater quality impacts.

The stormwater and water quality treatment system for the Project has been designed to be consistent with the provisions of the Ventura County 2011 TGM (May 2015 Errata).

The stormwater quality-control design for the Project utilizes a volume-based BMP approach. Volume-based BMPs are designed to capture and treat a certain volume of water expected from small, frequent storm events. The required treatment volume capacity is purposefully sized to ensure that the statistical majority of urban runoff pollutants would be captured and treated.

The Project stormwater quality control system has been designed to accommodate surface water runoff for storm events up to the 100-year frequency and reduce to the pre-developed 10-year storm event conditions (existing conditions). After routing through the detention basin, the net runoff discharged into the St. John's Drain would be less than the existing condition, and impacts would be less than significant.

CWD's 2015 *Urban Water Management Plan*²⁸ demonstrates sufficient water supply for the projected increase in water demand associated with growth in its service area through the 2035 planning horizon. Under each of the hydrologic conditions (i.e., normal water year, single-dry year, and multiple-dry years) the CWD analysis shows adequate supply to serve all users

²⁸ Camrosa Water District, *2015 Urban Water Management Plan*, 2015.

within its service boundary.²⁹ Furthermore, CWD would require the applicant to deed the existing well on the Project Site to the district, which would augment a portion of CWD's existing water sources. The implementation of the detention/retention basin would increase the amount of pervious land to allow for groundwater recharge. Benefits associated with infiltration include pollutant removal, hydromodification control, and flood control.

The Project would not utilize groundwater as a water supply source. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge which would result in a net deficit in aquifer volume or the lowering of the local groundwater table. Impacts would be less than significant.

The St. John's Drain collects and directs existing surface water runoff in a southwesterly direction from areas north and east of the project site, through the project site, and into Calleguas Creek.

The proposed residential development would increase the amount of impervious area that would be added to the project site. This would increase the amount of potential surface water runoff to the drainage area.

The calculated surface water runoff that enters Calleguas Creek from the project site under existing conditions is approximately 44.13 cfs for a 10-year storm event (Q_{10}). The calculated peak flow for a 100-year storm event (Q_{100}) with development of the project site would be 54.8 cfs, an increase of 11 cfs. The off-site detention basin contributes an additional 225.7 cfs peak flow during the 10-, 50- and 100-year storm events. There is the potential for the long-term buildup of sediment and organic material within the proposed drainage and stormwater management system. This buildup would likely occur in the bioswales, catch insert areas, and in the detention/retention basin. Consequently, the increase in surface water runoff would result in an increased amount of sediment transport. The sediment within the bioswales, catch basin inserts, and the detention/retention basin would increase during the operation of the Project. As such, there would be a potentially significant impact in siltation on site. However, following the implementation of Mitigation Measure 6.9-1, impacts would be less than significant.

The Project would increase the amount of impervious area to the project site. This would increase the amount of potential surface water runoff to the drainage area. The calculated surface water runoff that enters Calleguas Creek from the project site under existing conditions

²⁹ Camrosa Water District, 2010 UWMP, (2011) Tables 41, 42, and 43.

is approximately 44.13 cfs for a 10-year storm event (Q_{10}). The calculated peak flow for a 100-year storm event (Q_{100}) with development of the project site would be 54.82 cfs, an increase of 11 cfs. The off-site detention basin contributes an additional 225.7 cfs peak flow during the 10-, 50- and 100-year storm events. It should be noted that the calculations were based on Encompass Consultant's Preliminary Drainage Report, located in **Appendix 6.9**, which demonstrates that the design of the stormwater treatment system is technically feasible and that the project design features meet local and state requirements for discharge quantity and quality.

The detention/retention basin would be designed to handle post-development 100-year storm event surface water flows. On-site flows will be collected via surface flow, unfiltered catch basins, and bioswales and taken to the site's infiltration/detention basin for further treatment prior to being discharged into Calleguas Creek. The discharge of retained surface water would be regulated by a hydrodynamic separation device to simulate the preexisting 10-year storm event flows into Calleguas Creek, as previously discussed. The preliminary drainage report is conceptual in design. Therefore, an assessment of project site conditions would need to be conducted to verify the assumptions of the report for the location of the detention/retention basin and the stormwater runoff BMPs. As such, project level impacts may be significant.

In addition to the control of on-site flooding and flows, new projects within Ventura County are required to analyze potential impacts of the hydrologic impact to adjacent streams and rivers. The 2011 TGM³⁰ addresses the implementation of hydrologic control measures to prevent accelerated erosion and protection of stream habitat in downstream natural drainage systems. However, one of the exemptions listed in that section states the following:

- *5) Projects that have any increased discharge directly or via a storm drain to a sump, lake, area under tidal influence, into a waterway that has a 100-year peak flow (Q_{100}) of 25,000 cubic feet per second (cfs) or more, or other receiving water that is not susceptible to hydromodification impacts.*

As discussed in the preliminary drainage report, a model of the Calleguas Creek watershed, generated by the VCWPD, lists the flows along Calleguas Creek for storms ranging between the 2-year and the 500-year events. The two locations of interest for the project are Junctions 1945AB and 1960AB. The location "Calleguas Creek at Seminary Bend" (1945AB) shows that just upstream St. John's Drain the 100-year flow is 27,682 cfs. Downstream of St. John's Drain, Junction 1960AB –at Upland Road, indicates that the 100-Year flow is 27,699 cfs. Both flows are

³⁰ Ventura Countywide Stormwater Quality Management Program, *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures, Section 2.9 Hydromodification Requirements*, 2010.

stated to have been already reduced. If the waterway that the project discharges into has a 100-year peak flow greater than 25,000 cfs, it is not susceptible to hydromodification impacts. The values provided by the VCWPD model demonstrate that the flows along the section of Calleguas Creek, adjacent to the project site, exempts the Project from the hydromodification control criteria. However, following the implementation of Mitigation Measure 6.9-2, impacts would be less than significant.

The current amount of water runoff that enters Calleguas Creek is 1.790 cfs for a 10-year storm event (Q_{10}). The Project would design a detention/retention basin and stormwater treatment BMP system to handle the project's increase in surface water flows, as discussed above in Proposed Drainage Facilities. The proposed stormwater drainage system would treat and attenuate the stormwater runoff to local discharge requirements prior to discharge into Calleguas Creek. Following the implementation of Mitigation Measures 6.9-1 and 6.9-2, impacts would be less than significant.

As previously discussed, the use of heavy equipment and the disturbance of soil on the proposed residential development site would have a potential to substantially degrade the water quality of runoff. Potential impacts would be reduced by the implementation of the BMPs outlined in the SWPPP. The implementation of these measures, along with enforcement of the appropriate BMPs for construction, would reduce the degradation of water quality to less than significant.

As previously discussed, the Project would include a stormwater drainage system which would be able to maintain pre-development surface water flows into Calleguas Creek through the construction of a detention/retention basin and hydrodynamic separation device; would transport surface water runoff to the detention/retention basin through the use of bioswales and catch basin inserts; and would treat stormwater to local discharge requirements through the use of the bioswales and catch basin inserts. The implementation of Mitigation Measures 6.9-1 and 6.9-2 would further reduce impacts, which would be less than significant.

Mitigation Measures

MM 6.9-1: Prior to issuance of the first occupancy permit, an agreement shall be in place which states the Homeowner's Association as the responsible party for the regular maintenance of all on-site BMP structures (i.e., the replacement of catch basin inserts and the removal of built up sediment within the detention/retention basin). This agreement will describe the regular on-site maintenance activities

(such as removing built up sediment within the detention/retention basin every five years) and the timing of said activities in accordance with City of Camarillo standards.

MM 6.9-2: Prior to approval of final maps, a site specific drainage report shall be prepared by a California registered engineer to determine soil and infiltration information regarding the technical feasibility of the detention/retention basin and the storm water infiltration BMPs. The drainage report shall include the July 11, 2016 Post-Construction Stormwater Management Plan (PCSMP) which was approved by the City on August 29, 2016 and the PCSMP will be amended to include stormwater quality mitigation of the trailhead site prior to submittal of a development application, along with an assessment of project site conditions to verify the assumptions in the Encompass Consultant Group St. John's Seminary Residential Development Project Drainage Report (included in **Appendix 6.9**). Review of the site-specific drainage report shall be completed by a geotechnical consultant to confirm the feasibility of the proposed basin location and stormwater treatment BMPs. The site-specific drainage report shall be submitted to the City Engineer for review and approval.

Utilities:

Solid Waste

Potential Effect

The construction and operation of the Project could result in increased demand for solid waste services and facilities that exceeds current capacity, thereby creating a significant impact.

Finding

Solid waste generated by the Project would be disposed primarily at the Toland Road Landfill. Prior to disposal, recyclable materials would be removed from the waste stream at the Gold Coast Recycling and Transfer Station. These facilities have available capacity adequate to accept solid waste generated by the proposed residential uses. Impacts would be less than significant.

Supporting Explanation

Construction of the Project would involve grading and building, which would result in the generation of construction waste; demolition waste would be produced due to the buildings

that currently occupy the Project Site. Buildings on the Project Site that would be demolished total approximately 142,473 square feet in floor area.

As discussed in Section 6.8, Hazards and Hazardous Materials, most of the buildings on site contain asbestos and lead-based paint, which require special handling and disposal. Demolition involving these substances would be conducted by licensed asbestos- and lead-based-paint removal contractors. Disposal of nonfriable asbestos is permitted at the landfills serving the Project Site.³¹ No landfill in Ventura County is permitted to accept friable asbestos. Such wastes would be transported to other landfills in the region, such as the Azusa Land Reclamation Company.³² Lead-based paint may be disposed in any municipal solid waste landfill.³³ Demolition and construction wastes would be transferred to the Gold Coast Recycling and Transfer Station, and refuse incapable of being recycled would be hauled to the Toland Road Landfill.

During construction, debris would be separated on site. The Project would meet Camarillo Municipal Code requirements for recycling space and provide an easily accessible area serving the Project dedicated to the separation, collection, and storage of materials for recycling including, at a minimum, paper (white ledger, mixed, and cardboard), glass, plastics, and metals. The applicant will be required to comply with all applicable rules and regulations in carrying out construction of the Project.

The Project will comply with local requirements for disposal of construction waste. Adequate landfill capacity for the disposal of construction waste generated by the Project exists at either the Del Norte Regional Recycling and Transfer Station, Gold Coast Recycling and Transfer Station, Simi Valley Landfill, and Toland Road Landfill. Due to the large quantity of demolition waste, impacts would be potentially significant. However, compliance with all local requirements for construction waste and implementation of Mitigation Measure 6.20-1 would reduce construction impacts to less than significant levels.

The City of Camarillo has met per capita solid waste disposal targets set by CalRecycle. The City's target disposal rates are 7.7 pounds per day (ppd) per resident and 14.1 ppd per employee. In 2011, the last year for which data is available, the City disposed of 3.6 ppd per

³¹ Ventura County Air Pollution Control District, "Asbestos," <http://www.vcapcd.org/asbestos.htm#AsbestosDisposalSites>.

³² Ibid, "Asbestos," <http://www.vcapcd.org/asbestos.htm#AsbestosDisposalSites>.

³³ US Environmental Protection Agency, "Disposal of Residential Lead-Based Paint Waste," <http://www.epa.gov/osw/nonhaz/municipal/landfill/pb-paint.htm>.

resident and 7.6 ppd per employee. Solid waste generated by the Project would be disposed of primarily at the Toland Road Landfill.

The waste generation of the open space and recreation areas would be negligible and is, therefore, not considered in this analysis. The Project would generate an estimated 1.11 tons per day (tpd) of solid waste that would be disposed of at the Toland Road or Simi Valley Landfills.

The Toland Road Landfill, which is the primary landfill serving the City of Camarillo, including the Project Site, accepted approximately 1,260 tpd on average in 2010, 240 tpd less than its permitted daily capacity of 1,500 tpd. Waste generated by the Project would use less than one percent of the remaining permitted capacity. Project-generated solid waste could, therefore, be accommodated at the Toland Road Landfill, which has adequate remaining capacity to accept the Project's solid waste until its projected closure in 2027. The Project would be served by a landfill with sufficient permitted capacity, and impacts would, therefore, be less than significant.

Mitigation Measure

MM 6.20-1: Prior to issuance of construction and grading permits, a waste reduction and recycling plan shall be prepared by the project applicant and approved by the City of Camarillo.

E.3 Findings Regarding Impacts Analyzed in the EIR and Determined to be Significant and Unavoidable

This section includes Findings for Project impacts which are determined to be significant even with the imposition of mitigation measures. These impacts cannot be mitigated to a less than significant level and therefore remain unavoidable. Although the City Council finds that all significant impacts of this Project listed below cannot be substantially lessened or avoided by the imposition of mitigation measures or alternatives, the mitigation measures found in the EIR and listed below will be implemented to lessen the Project's impact. Specific Findings of this City Council for each impact are set forth below in this section.

Further, in accordance with Section 15093 of the State CEQA Guidelines, a Statement of Overriding Considerations has been prepared (see Section 8).

Agricultural Resources

Potential Effects

The Project area includes agricultural features such as avocado and citrus groves, and eucalyptus windrows. Implementation of the Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

Findings

Implementation of the St. John's Seminary Residential Community Project would convert approximately 56.82 acres of Important Farmland, (12.10 acres of Prime Farmland, and 44.72 acres of Unique Farmland) to residential and ancillary uses. The Camarillo General Plan Land Use Element designates the project site as natural open space and agricultural uses. The project site is zoned RE-5 (5-acre lot minimum). Preserving agricultural areas elsewhere in Camarillo is not an option to mitigate the impact of the Project because the General Plan already identifies several parcels within the City boundary that are designated for agriculture. Several large areas are located in the southern part of the City while a few others are in the northern part of the City. As such, development of the Project would reduce the amount of agricultural land envisioned under the General Plan and impacts from the Project would be significant and unavoidable, for which no feasible mitigation measures exist.

The Project Site does not contain Williamson Act contracted lands within its boundary. Therefore, there are no impacts regarding conversion of land that is under a Williamson Act contract.

The Project is currently within an area designated as RE (Rural Exclusive) Zone as described in the City of Camarillo's General Plan Land Use Element. With the approval of the General Plan Amendment and zone change, the development of the Project will not conflict with adjacent land uses and zoning. Therefore, impacts would be less than significant.

The Project Site does not include land that is considered forest land. Therefore, there would be no conversion of the site from forest land uses, and there would be no impact.

The residential portion of the Project, along a portion of its western boundary, will be adjacent to active agricultural land, operated and maintained by the St. John's Seminary. Development of

the residential portion of the Project could create nuisances from the active farming located adjacent to the proposed residential units including noise, odors, pests, pilfering, and pesticide applications. The applicant submitted a conceptual landscape plan showing the landscape buffer between the two land uses as part of the residential planned development (RPD) application submittal. Implementation of Regulatory Compliance Measure 6.2-1 and Regulatory Compliance 6.2-2 would reduce impacts to a less than significant level.

The above findings are made in conjunction with a Statement of Overriding Considerations, which is simultaneously being adopted for the Project (see Section G.).

Supporting Explanation:

The proposed residential development site is 88.45 acres in size, a portion of which is currently under agricultural production, or occupied by the abandoned St. John’s Seminary College campus buildings, and paved areas (including access roads). The Project, upon development, will convert the existing farmland (Prime Farmland, and Unique Farmland) to non-agricultural, i.e., residential, land uses.

The State Important Farmland Maps show the relationship between the quality of soils for agricultural production and the land’s use for agricultural, urban, or other land uses purposes. The current State Important Farmland Map for Ventura County identifies that the proposed project consist primarily of Unique Farmland and Unique and Built-up Land. **Table 6.2-5, Important Farmland Map of the Proposed Project** shows the breakdown of each type of land on the proposed project site that is classified under the State Important Farmland Mapping Program. Additionally, **Figure 6.2-2, Important Farmland Map** shows the location of each type of land use as designated under the State Important Farmland Mapping Program.

Table 6.2-5

Important Farmland Map of the Proposed Project

Land Type	Proposed Project (acres)
Urban and Built-up Land	24.43
Prime Farmland	12.10
Farmland of Statewide Importance	- 0 -
Unique Farmland	44.72
Other Land	7.20
Total	88.45

Source: California Department of Conservation, “Farmland Mapping and Monitoring Program”

The orchards on the proposed project site are not considered economically viable due primarily to the condition of the citrus and avocado trees, the current state of the irrigation system, and the location of the orchards on terraced slopes. In order for the agricultural land within the Project Site to become economically viable, an upgrade to the irrigation system and a full conversion of the citrus orchards to avocado orchards would be necessary. The cost of replanting with avocados is estimated at \$11,000 per acre. New avocado orchards would take four years to produce fruit and eight years to reach peak production. Considering the costs and time required, a conversion to avocado crops would not be economically viable, and the amount of time to recoup the costs from such a conversion would take longer compared to the development of the Project. Therefore, the continued farming of the Project Site for profit is not considered viable under existing conditions.

The emergency access point to the proposed residential community would be provided via the existing St. John's Seminary access roadway, which extends from Upland Road, and would connect to the Project Site's circulation system on the project site's northeast boundary. The existing roadway is 23 to 26 feet wide and no widening or tree removal would be necessary and there would be no impacts to Important Farmland.

As discussed above, the Project will convert Important Farmland (farmland designated as Prime Farmland and Unique Farmland) to non-agricultural land uses. Although the percentage of the Important Farmland to be converted is small compared to the amount of Important Farmland that was surveyed within Ventura County in 2014 by the California Department of Conservation Farmland Mapping and Monitoring Program, any conversion of Important Farmland to non-agricultural land uses could have an impact on the local and state agricultural economy. Therefore, loss of farmland is a significant impact.

The western portion of the Project would be adjacent to existing citrus crops to remain and which would continue to be maintained and operated by the St. John's Major Seminary. The proximity of the proposed residential units to the agricultural land could cause concern regarding agricultural activities that may be detrimental to the residents upon buildout of the proposed residential units. Such concerns include agricultural pesticide overspray, pest and vermin infestation, noise from agricultural activities, and odors from the agricultural activities occurring adjacent to the proposed residential units. A notification, such as that provided under the "Right to Farm Ordinance" adopted by the County of Ventura. The intent of a Right to Farm Ordinance, which is to inform potential nearby residents of the adherent nuisances that could occur due to the location of the adjacent farming activities, is typically only for new residents and occupants of buildings located adjacent to farming operations and would also be applicable

in this situation. However, at this time the City of Camarillo does not have a Right to Farm Ordinance and the Project would not be subject to the Right to Farm Ordinance adopted by the County of Ventura.

The Project would include the development of a landscape buffer along the western, northern, and eastern boundaries of the Project Site. The Applicant has submitted a conceptual landscape plan with a comprehensive planting pallet as part of the residential planned development (RPD) application submittal. The conceptual landscape plan shows the width of all landscape buffers, the vegetation type that all landscape buffers are composed of, and the vegetation height of all landscape buffers.

In addition, per the City of Camarillo Municipal Code, Regulatory Compliance Measures 6.2-1 and 6.2-2 would be implemented; following the implementation of the RCMs, impacts related to agricultural uses on adjacent property would be less than significant.

Regulatory Compliance Measures

RCM 6.2-1: As part of the Tentative Tract map application, the proposed project shall submit a landscape plan that includes an agricultural setback on the western portion the proposed project site between the ongoing agricultural activity of the St. John's Seminary and the proposed residential units of the proposed project. The landscape plan shall also provide an agricultural setback between the residential uses proposed in the eastern portion of the site and existing agricultural uses in the County, consistent with the guidelines established by the Ventura County Agricultural Commissioner's Office and be approximately 150 feet in width, and provide a vegetative screen, with the following requirements:

- Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown.
- Trees and shrubs should be vigorous, drought tolerant, and at least 6 feet in height at the time of installation.
- Plants should have 50 to 75 percent porosity (i.e., approximately 50 percent to 75 percent of the plant is air space)
- Plant height should vary in order to capture drift within 4 feet of ground applications.

- A mature height of 15 feet or more is required for trees.
- To ensure adequate coverage, two staggered rows should be located five feet apart and consist of minimum 5-gallon plants at least six feet tall planted 10 feet on center.
- A long-term plan shall be in place for maintaining the vegetative shelter belt.

RCM 6.2-2: The proposed project shall include a provision that requires mandatory disclosure to future property owners within the project site of the potential noise, odors, dust, and spraying that may result from farming and that details procedures for mediation of disputes that may arise. The intent of the disclosure shall be to properly inform and to set realistic expectations for new residents, occupants of buildings and persons partaking in recreational activities, located adjacent to farming operations and shall put a new purchaser of property on notice that existing agricultural operations inherently have noise, odor, and other potentially annoying activities that are associated with accepted agricultural operations.

Mitigation Measures

Approaches to mitigate the loss of farmland include the purchase of agricultural land easements in order to set aside and preserve Important Farmland, similar to the amount of acres being lost with the development of a Project. The City of Camarillo currently has approximately 997 acres of land within its City Urban Restriction Boundary (CURB) that is currently zoned as Agriculturally Exclusive. The Agricultural Exclusive Zone is intended for promotion and preservation of agricultural activities on lands capable of producing and supporting agricultural uses and excluding those uses, which have a detrimental effect on areas designated for agricultural purposes. In order for additional land to be included into the CURB, a City referendum would be required.³⁴

The City of Camarillo also participates in the Camarillo-Oxnard Greenbelt Agreement,³⁵ which sets aside approximately 27,000 acres of agricultural land between the City of Camarillo and the City of Oxnard for conservation purposes. The agreement includes agriculturally active land

³⁴ City of Camarillo General Plan, "Land Use Element" City of Camarillo, October 8, 2003, 4.1.

³⁵ County of Ventura Resource Management Agency Planning Division, "Greenbelt Program" <http://www.ventura.org/RMA/planning/Programs/greenbelts.html>, retrieved October 2, 2008.

that separates the City of Camarillo and City of Oxnard and was established to protect open space and agricultural lands and reassure property owners located within this area that land will not be prematurely converted to agriculturally incompatible uses.

The feasibility of acquiring easements or adding land to the greenbelt is not known. However, placing land into an easement or adding land to the greenbelt would not increase existing agricultural production acreage in the City or County, thus, no mitigation is feasible.

Cultural Resources

Historical Resources

Potential Effect

Implementation of the Project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

Findings

A portion of the Project Site is currently occupied by the vacant St. John's St. John's Seminary College campus. Historical studies determined that the design of St. John's Seminary is potentially eligible as an historical site based on its architecture. The implementation of the Project would result in the loss of the campus and have an unavoidable and significant impact to the historical resources located within the Project Site.

Supporting Explanation

Designed by the Los Angeles architectural firm of A. C. Martin Partners, St. John's Seminary College was constructed between 1961 and 1963 around a central mall. With its emphasis on formality, symmetry, axial planning, and allusions to classicism, the seminary is an exemplar of New Formalism, an architectural style that achieved its height of popularity in the 1960s through the mid-1970s. New Formalism, which attempted to synthesize Modernism with the formal qualities of Classical architecture, was especially popular for institutional commissions, such as schools, hospitals, civic buildings, and churches. The college's architectural scheme features the character-defining elements of the style, which include (1) buildings separated from nature and usually set on podium, (2) allusion to classical vocabulary especially columns and entablatures, (3) arched forms, (4) exterior walls clad in stone, (5) an emphasis on symmetry and balance, and (6) formal landscaping including monumental sculpture. Since its construction, the

campus has undergone few alterations and can still convey its original scheme and architectural style. Built to a high standard of finish, using luxurious materials and an innovative use of concrete construction, St. John's Seminary College is an important example of the New Formalist style. In addition, it enjoys additional significance because it represents one of the few commissions in which the style was not relegated to just one or two buildings, but represents the work of an entire complex.

Implementation of the Project would result in the demolition of the St. John's Seminary College campus while the nearby Doheny Library would be retained and remain unchanged.

The integrity and eligibility of the St. John's Seminary College campus meet the criteria listed under the federal, state, and local regulations. These regulations include the National Historic Preservation Act of 1966, the CRHR, and the Historic Preservation Ordinance of the Camarillo Municipal Code. The seminary derives its importance from its status as an exemplar of the New Formalism style designed by A. C. Martin Partners, one of California's leading architectural firms for the last 100 years. The St. John's Seminary College campus meets the requirements of Criteria 3.³⁶ These criteria include the representation of the work of a master, the distinctive type of architectural style that defines a period and reflects the city's historical heritage.

As the implementation of the Project would result in the demolition of the St. John's Seminary College campus, the Project will materially alter in an adverse manner those physical characteristics of the buildings that make it eligible for listing as a historical resource as defined in State CEQA Guidelines Section 15064.5 (b1-2). Even with implementation of Mitigation Measure 6.5-1, given complete demolition of the St. John's Seminary College campus buildings, the residual impacts from the proposed project would be significant and unavoidable.

Mitigation Measure

MM 6.5-1: Photo-document St. John's Seminary College prior to the alteration of its setting with large-format, black and white photography and provide a written report. The recordation shall be of sufficient detail to preserve a visual record of the college and its setting and shall meet the Historic American Buildings Survey (HABS) / Historic American Engineering Record (HAER) standards for documentation and photo-documentation of historic resources at a minimum Level 3 recordation. This documentation shall be donated to a suitable repository, such as the Camarillo Public Library and the Ventura County

³⁶ Post/Hazeltine, Historic Resources Report, May 2008, included in Appendix 6.5 of the Draft EIR.

Museum of History and Art. Additionally, a copy of the recordation shall be donated to the St. John's Seminary Archive.

E.4 Other CEQA Required Analysis in the EIR

Growth Inducing Impacts of the Project

Potential Effect

Development of the Project has the potential to induce growth by fostering economic or population growth either directly or indirectly.

Finding

The Project does not meet a growth-inducing criterion specified under CEQA, and, therefore, the Project is not considered to be growth inducing.

Supporting Explanation

Growth inducing impacts are discussed at pages 9.0-3 through 9.0-6 of the Draft EIR. The following facts support the above finding:

Growth may indirectly occur following the removal of physical impediments or restrictions to growth, or the removal of regulatory impediments resulting from land use plans and policies. In this context, physical impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water or sewer service), while planning impediments may include restrictive zoning and/or general plan designations.

The construction of water, sewer, electricity, and natural gas infrastructure is required to support residential and recreational of the uses that would be developed by the Project.

In the case of water, development of the Project requires the construction of a system designed to convey and distribute potable water to uses in the Project area. The water supply and distribution system designed for the Project does not provide capacity beyond that required to serve the proposed residential and recreational uses. In addition, the construction of this distribution system would involve the connection to existing water mains located within the surrounding roadway network that serves the existing residential neighborhoods located directly east of the Project area. No new water mains other than those required to serve the

Project are to be constructed. Therefore, the construction of this water infrastructure would not induce any additional growth in the surrounding area.

The Project would also involve the extension of wastewater collection lines to serve the proposed residential uses; the existing St. John's Seminary College uses a septic system. Only local sewage collection lines that will flow into existing trunk lines to the west are proposed. These lines will be located within the planned streets and would not provide capacity for additional growth in the area, nor are they configured to facilitate extension into the surrounding area.

Electricity and natural gas transmission infrastructure presently exists adjacent to the Project area. Development of the Project would necessitate the construction of a distribution system to serve the residential and recreational uses on the site. This system would be designed to accommodate these uses, and would not extend beyond the requirements or boundary of the Project Site. Given the existence of established energy transmission lines in this area, no growth-inducing impacts are expected with regard to this type of infrastructure.

An established roadway network exists to the north of the Project area in Camarillo. The Project does not include any new major collector roadways that would provide additional access or traffic capacity that would facilitate development of the surrounding land. The Project will be served by the proposed spine road off an existing street (Upland Road) that serves the residential neighborhoods in the northern portion of Camarillo. A secondary emergency access road would be via the existing roadway on the St. John's Major Seminary campus. The provision of this secondary access roadway to provide emergency access would not serve to allow or promote additional growth.

The Camarillo City Urban Restriction Boundary (CURB) defines a boundary within which development is allowed to take place through 2018 when the City will restrict urban services and urbanized land uses to land located within the CURB. No form of discretionary entitlement that will result in urban land uses placed outside of this boundary will be granted by the City. The current CURB lies north the project area, and generally follows the current Sphere of Influence line for the City. The Project does not include any urban land uses outside the CURB. Therefore, implementation of the Project would not induce residential development surrounding or near the site.

Development can be considered growth inducing when it is not contiguous to existing urban development and "leaps" over open space areas. The proposed residential development is

located within the City's CURB, and located immediately north and west of existing residential development in the City. While the Project would extend this existing pattern of development, it would not "leap-frog" over undeveloped areas and introduce development that is not continuous with existing development. As the Project site is adjacent to development on the east, west, and south, the extension of the existing urban development pattern in the City by the Project would not result in additional growth.

The Project is focused on the development of 300 senior citizen housing units within the next five years. The Project Site is located in a community presently served by existing retail-commercial uses and other support services and facilities, including public transit. Given the relation of the Project to the existing development pattern in the surrounding area, it is not anticipated that the Project will foster or promote additional growth of commercial uses in the area, but rather will support existing resources of this nature. Given the size of the Project and the relatively small resulting increase in population, it is expected that new residents seeking commercial uses in the City could be absorbed by the existing commercial opportunities in the City and nearby communities.

The future residents of the senior citizen housing units that would be developed may also represent a small, incremental increase in the local labor force. Given the size of the Project and the relatively small resulting increase in population, it is expected that new residents seeking employment within the City would be absorbed by existing employment opportunities in the City and nearby communities. The growth in population associated with the Project is consistent with the adopted growth projections for the City. Therefore, it is not anticipated that the Project alone would induce growth in commercial, industrial, and office development on presently undeveloped property in the City.

As previously mentioned, the Project Site is located within the City of Camarillo CURB line. The CURB line sets a boundary for development of the City over a 20-year period through December 31, 2020. The proposed residential uses are located to be consistent with the residential land use designations on the City's general plan land use map. Development of the site with residential uses is, therefore, consistent with existing land use plans and policies and is not precedent setting. For an extensive discussion of land use approvals being sought by the applicant and the land use compatibility of the project with the CURB refer to Section 6.10, Land Use in the Draft EIR.

Significant Irreversible Environmental Changes Which Would Be Involved In The Project Should It Be Implemented

Section 15126.2(c) of the CEQA Guidelines states that the “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” Section 15126.2(c) further states that “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The types and level of development associated with the proposed project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during construction of the proposed project and would continue throughout its operational lifetime. The development of the proposed project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources and (3) the transportation of goods and people to and from the project site.

Construction of the proposed project would require consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics) and water. Fossil fuels, such as gasoline and oil, also would be consumed in the use of construction vehicles and equipment.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the proposed project. However, this resource consumption would be consistent with growth in the Southern California region and that expected to occur under the City of Camarillo General Plan.

F. ALTERNATIVES TO THE PROJECT

State CEQA Guidelines §15126.6(a) requires an evaluation of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The objectives of the Project are identified in Section 2.0, Project Description, of the Draft EIR, and in **Section B** of these Findings. Alternatives are used to determine whether or not a variation of the Project

would reduce or eliminate significant project impacts within the basic framework of the objectives.

State CEQA Guidelines §15126.6(e) requires that, among other alternatives, a “no project” alternative be evaluated in comparison to the Project. *State CEQA Guidelines* §15126.6(e)(2) requires that the “no project” analysis “discuss the existing conditions ... as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The project alternatives evaluated in detail in the EIR were the following:

- No Project Alternative
- Reduced Project Alternative

F.1 Project Objectives and Legal Requirements

At the time of project approval, the lead agency’s decision-making body must determine whether the alternatives are feasible or not. The lead agency must consider whether specific “economic, legal, social, technological, and other considerations ...make infeasible mitigation measures or alternatives identified in the environmental impact report.” (Pub. Res. Code, § 21081(a)(3); *State CEQA Guidelines* § 15091(a)(3)).

Importantly, CEQA gives lead agencies the authority to approve a project notwithstanding its significant environmental impacts, if the agency determines it is not “feasible” to lessen or avoid the significant effects. (Pub. Res. Code, § 21002). If specifically identified benefits of the project outweigh the significant unavoidable environmental impacts, the adverse impacts may be considered “acceptable,” thereby allowing for lead agency approval of the project, notwithstanding such adverse impacts, provided the agency adopts a statement of overriding considerations. (Pub. Res. Code, § 21081.1(b); *State CEQA Guidelines* § 15093).

As called for by the *State CEQA Guidelines*, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The objectives of the St. John’s Residential Community Project are as follows:

The following are the City’s objectives for the St. John's Seminary Residential Community Project:

- Provide a planned development that furthers the community objectives for residential development including a variety of building forms and types and sensible neighborhood planning techniques
- Meet the community's need for a senior citizen housing development with a rural character and a low-medium density consistent the City's planning objectives.
- Respect the property's significant cultural and historical context by developing neighborhoods with architecture compatible with the adjacent St. John's Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

CEQA does not require adoption of an alternative that does not adequately meet most of the basic project objectives as determined by the lead agency decision makers.

F.2 Findings Regarding Alternatives Considered in the EIR

Alternative 1 - No Project Alternative

The No Project Alternative is required by Section 15126.6(e)(2) of the *State CEQA Guidelines* and assumes that the Project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project. However, "no project" does not necessarily mean that development will be prohibited. The No Project Alternative includes "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and

consistent with available infrastructure and community services.”³⁷ Under the No Project Alternative, the Project would not be constructed. The site buildings would remain in their present vacant condition for the near future. There are currently no plans for reuse of the campus at this time. If left vacant and unmaintained, there is a likelihood that the existing buildings will continue to experience further deterioration.

Consideration of No Project Alternative:

Under The No Project Alternative demolition of the St. John’s Seminary College campus buildings and construction of the senior citizen housing units, and recreational uses, including the proposed trailhead, would not occur. The No Project Alternative would result in fewer impacts for most issues than the proposed project. However, actions associated with geology/soils, hazards, hydrology, and sewage would result in impacts that are marginally greater than those of the Project. Under this alternative, the existing buildings on the Project Site would continue to deteriorate over time and thus potentially cause significant aesthetic and cultural resource impacts.

Additionally, the No Project Alternative would not fulfill any of the project objectives:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community’s need for senior citizen housing development with a rural character and a low-medium density consistent the City’s planning objectives;
- Respect the property’s significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John’s Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City’s housing and land use mix within the City’s urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;

³⁷ CEQA § 15126.6[e][2]

- Provide a source of revenue to ensure ongoing operation of the St. John’s Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

Findings

The City Council finds that while the No Project Alternative results in less significant impacts to agricultural resources, and cultural resources impacts compared to the Project, the alternative would not meet any of the key project objectives, and is socially undesirable, and is therefore rejected.

Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative 140 senior citizen residential housing units, recreation/open space areas, and a two surface parking lots with approximately 38 guest spaces would be constructed. This reduction in units would represent an over 53 percent reduction in the number of new housing units. The main difference in the Reduced Project Alternative from the Project would be the retention of a larger area of agricultural land; implementation of this Alternative would still require the demolition of the St. John’s Seminary College campus buildings. All applicable Project Design Features, Regulatory Compliance Measures, and Mitigation Measures would be implemented under this Alternative.

Consideration of the Reduced Project Alternative

The Reduced Project Alternative would meet all of the Project Objectives as listed above, by providing a senior citizen housing development project to replace the vacant campus buildings on the project site. Specifically, this Alternative would meet the following proposed project objectives to a similar, or in some cases a somewhat lesser (with respect to the provision of a source of revenue), extent as the Project:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community’s need for senior citizen housing development with a rural character and a low-medium density consistent the City’s planning objectives;

- Respect the property's significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John's Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

However, this Alternative would not eliminate the two significant and unavoidable impacts of the Project; the conversion of agricultural land to nonagricultural use (although it would reduce this impact), and the demolition of the St. John's Seminary College buildings, a significant historical resource.

Findings:

The City Council finds that while the Reduced Project Alternative would result in reduced impacts to agricultural resources, this impact would not be eliminated and impacts would remain significant and unavoidable; further, significant and unavoidable impacts to cultural resources would be similar under Alternative 2 and the Project. Thus the Alternative would not reduce the significant impacts of the Project, and is environmentally and socially undesirable, and is therefore rejected.

G: STATEMENT OF OVERRIDING CONSIDERATIONS

The Camarillo City Council hereby adopts this Statement of Overriding Considerations concerning the unavoidable significant impacts of the St. John's Residential Community to explain why the benefits of the Project outweigh and override its unavoidable impacts.

The Final Environmental Impact Report (Final EIR) for the St. John's Residential Community Project identifies and discusses significant environmental impacts that could occur as a result of implementation of the Project. The City Council made specific Findings pursuant to CEQA, on each of the significant environmental impacts of the Project and on mitigation measures and alternatives. Nevertheless, even with implementation of feasible mitigation measures, certain significant and unavoidable impacts related to agricultural resources and historical resources still remain as identified in Section F of these findings.

In accordance with Section 15093 of the *State CEQA Guidelines*, the City Council hereby finds that following economic, legal, social, environmental, and other benefits of the St. John's Residential Community Project outweigh its unavoidable, adverse environmental impacts discussed in the Findings, based on the considerations set forth herein:

Benefits of the St. John's Residential Community

Accordingly, the City Council adopts the following Statement of Overriding Considerations. The City Council recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) reduced the significant adverse environmental effects of the Project by incorporating the Project Design Features and Regulatory Compliance Measures into the Project, (ii) adopted all feasible mitigation measures described above and in the Draft EIR and Mitigation Monitoring and Reporting Program, (iii) rejected certain alternatives to the Project (as analyzed in the EIR), (iv) recognized all significant, unavoidable impacts, and (v) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City Council hereby finds that the benefits of the Project outweigh the potential unavoidable significant adverse impacts, and that the unavoidable significant adverse impacts are nonetheless acceptable, based on the following overriding considerations.

Summarized below are the benefits, goals and objectives of the Project. These provide the rationale for approval of the Project. Any one of the overriding considerations of economic, social, aesthetic, and environmental benefits individually would be sufficient to outweigh the significant unavoidable impacts of the project and justify the approval, adoption, or issuance of

all of the required permits, approvals and other entitlements for the project and the certification of the completed Final EIR.

- The Project will improve upon the current aesthetics of the Project Site by demolishing the vacant and deteriorating St. John's Seminary College buildings.
- The Project will provide a well-designed development that is compatible with and complementary to surrounding uses.
- The Project will provide a transition between the St. John's Major Seminary to the west of the Project Site, the single-family developments to the south and east, and the open space and agricultural uses to the north.
- The Project will provide a development that is consistent with the land uses and other policies and goals of the City of Camarillo General Plan.
- The Project will provide new senior citizen housing on underutilized/graded land to accommodate projected regional growth in a location that is adjacent to existing infrastructure, services, transportation corridors, and major employment centers.
- The Project will provide a residential development with on-site recreational opportunities and common amenities such as pedestrian and bike trails, open space, parkland, and landscaping.
- The Project will conform to all required sustainability and conservation measures, and will include significant additional sustainable features.
- The Project will mitigate, to the extent feasible, its potential environmental impacts.

In addition, the development and use of the Project will accomplish the Project Objectives described in the EIR, including the following:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community's need for senior citizen housing development with a rural character and a low-medium density consistent the City's planning objectives;

- Respect the property's significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John's Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

For the above-mentioned reasons, the City Council hereby finds that the benefits of the Project outweigh and override any adverse environmental impacts associated with the St. John's Residential Community.

H. ADOPTION OF A MITIGATION MONITORING PROGRAM FOR THE CEQA MITIGATION MEASURES

Section 21081.6 of the Public Resources Code requires that when a public agency is making the findings required by State CEQA Guidelines Section 15091(a)(1), codified as Section 21081(a) of the Public Resources Code, the public agency shall adopt a mitigation monitoring and reporting program (MMRP) for the changes to the Project which it has adopted or made a condition of approval, in order to lessen or avoid significant effects on the environment.

The Camarillo City Council hereby finds that the MMRP, which is included as Chapter 4.0 in the Final EIR and incorporated by reference to these Findings, and incorporated in the Project's entitlement approvals, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of Project conditions to mitigate or avoid potential environmental effects in a manner designed to ensure compliance during Project implementation.