

EXHIBIT "12.1"

**FINAL
ENVIRONMENTAL IMPACT REPORT
FOR
Focused Update to the Piru Area Plan
and**

**Privately-Initiated General Plan Amendments, Zone
Changes, Planned Residential Development Permits and
Tract Maps**

Filed by John Reider, Dana Levy, and James Finch



SCH #: 2004121008

The Environmental Report Review Committee recommends that the decision-making body of the proposed project find that this document has been completed in compliance with the California Environmental Quality Act.


Nancy Settle, ERRC Chair

November 1, 2006
Date

The Draft EIR was circulated for public review from February 10, 2006 to May 1, 2006 and hearings were held by the Ventura County Environmental Report Review Committee (ERRC) on October 18, 2006 and on November 1, 2006, ERRC recommended that the EIR be certified.

Since the Draft EIR was circulated for public review, the EIR has been revised to incorporate the comments received during the public review period and staff responses to these comments as well as minor technical changes as directed by the ERRC. These changes are highlighted in the proposed Final EIR in legislative format. Additions to the Draft EIR are indicated by underlined text (additions), deletions are indicated by strike-out text (~~deletions~~).

The Final EIR is comprised of three separate documents. This document consists of the Final EIR text. A second document (Appendices to the Final EIR) contains the Notice of Preparation, Initial Study, various technical appendices which supplement the FEIR text and the Notice of Completion and comments received during the public review period and responses to comments. The third document is the Update to the Final EIR which describes changes to the project, changes to circumstances or new information which has become available since the November 1, 2006 ERRC hearing.

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1. Introduction

1.1 Project Background/History

The Piru Area Plan is an integral part of the Countywide General Plan and serves as the land use plan for the Piru Area of Interest. The Piru Plan was originally adopted in December 1986 and has subsequently been amended several times, most recently in October 2001 (to accommodate expansion of the Highway Commercial area located at Main Street and Highway 126).

With respect to the current Area Plan Update, the following General Plan Amendment Screening Hearings have occurred:

July 1999 - John Reider GPA Screening Hearing #1: The Board of Supervisors authorized County staff to evaluate a General Plan Amendment filed by John Reider to change the County General Plan land use designation and the Piru Area Plan land use designation to allow residential development up to six dwelling units per acre on a 5-acre site (Component A).

July 2001 - John Reider GPA Screening Hearing #2: Mr. Reider returned to the Board of Supervisors indicating that six dwelling units per acre on the Component A site was not financially feasible. The Board of Supervisors authorized County staff to evaluate a General Plan Amendment filed by John Reider to change the County General Plan and the Piru Area Plan land use designation to allow residential development up to 15 dwelling units per acre on the above Component A site.

February 2003 - Dana Levy GPA Screening Hearing: The Board of Supervisors authorized County staff to evaluate a General Plan Amendment filed by Dana Levy to change the County General Plan and Piru Area Plan land use designation to allow residential development up to 15 dwelling units per acre on a 16.5-acre site (Component B).

July 2004 - James Finch GPA Screening Hearing: The Board of Supervisors authorized County staff to evaluate a General Plan Amendment filed by James Finch to change the County General Plan and the Piru Area Plan land use to allow residential development up to 6 dwelling units per acre on 28 acres and up to 15 dwelling units on the remaining 5 acres of the 33-acre site (Component C).

Board Direction

In approving the above GPA screenings, the Board of Supervisors directed that the applicants concurrently process applications for a General Plan Amendment, Zone Change, Tract Map, Residential Planned Development Permit and Development Agreement.

The Board of Supervisors also directed staff to prepare an update to the Piru Area Plan that would consider urban land uses for the proposed Piru Expansion Area (a 62-acre area comprised of Components A, B, C, and D). Component D consists of 6 parcels, not under the control of any of the above applicants, totaling approximately 8 acres. The Board required each of the above applicants to participate in the cost of the Piru Area Plan Update. The Piru Redevelopment Agency also agreed to participate in the cost of the Update.

The Board further directed that a Development Agreement be prepared to ensure that a portion of the proposed dwelling units would be affordable to lower income households. On January 25, 2005, the Board of Supervisors considered an inclusionary housing policy and provided additional direction for the Piru development projects. The Board decided that the Piru developers should be required to comply with the same standards mandated by the State for projects within the Piru redevelopment area. State redevelopment law requires 15% of proposed dwelling units be set aside for low or moderate income households. Additionally, 40 percent of these affordable dwelling units (6% of the total) must be affordable to very low income households (6%). Covenants or restrictions are required to maintain affordability for a period of 45 to 55 years based on tenure.

Chronology

Subsequent to the above described screening hearings, the following actions regarding the Piru Area Plan Focused Update project have occurred to date:

- ▶ February 10, 2003, John Rieder submitted an application for a General Plan amendment, Piru Area Plan Amendment, zone change, tentative tract map and residential planned development permit for 60 multi-family dwelling units.
- ▶ November 21, 2003: Dana Levy submitted an application for a General Plan amendment, Piru Area Plan Amendment and zone change.
- ▶ January 21, 2004: Planning staff met with the Piru Neighborhood Council. The Council indicated a desire for a "hands on" approach to the proposed update program. The Council created a Piru Area Plan Update Committee.
- ▶ February 2004 to October 2004: Planning staff met with the Piru Area Plan Update Committee to review existing Area Plan goals, policies and programs, identify project alternatives and address issues of concern to the Piru Community.
- ▶ November 11, 2004: James Finch submitted an application for a General Plan amendment, Piru Area Plan Amendment and zone change to accommodate 185 single-family and multi-family dwelling units.
- ▶ November 15, 2004, Dana Levy submitted an application for a tentative tract map and residential planned development permit for 104 single-family dwelling units and a 1.7-acre detention basin.
- ▶ December 1 to December 31, 2004: A Notice of Preparation and Initial Study were circulated to appropriate public agencies, organizations and individuals (see EIR Appendix 8.1). A community meeting was held on December 6, 2004 to discuss the Piru Area Plan Update project and the planning and environmental review process.
- ▶ January 2004 to February 2006: Preparation of the Draft EIR
- ▶ February 10 to May 1, 2006: The Draft EIR was circulated for public review.
- ▶ May 15, 16 and 18, 2006: Downtown Solutions, a consulting firm employed by Southern California Association of Governments under a Caltrans grant, conducted a design charrette in Piru. The resulting Piru Vision plan for the Piru Expansion Area is described in the Project Alternatives Chapter.
- ▶ July 31, 2006: Dana Levy withdrew his application for a General Plan Amendment, Zone Change, Tract Map, and Planned Development Permit.

1.2 Purpose/Legal Authority

The California Environmental Quality Act (CEQA), sections 21000 et seq. of the Public Resources Code, requires any "project" approved by a State or local agency to be reviewed for its impact on the physical environment. "Project" is defined as any direct or indirect action that could result in a physical change to the environment, and includes general plan amendments and discretionary entitlements associated with urban development including zone changes, subdivisions and planned residential developments). As required by CEQA, the State Office of Administrative Law has adopted guidelines to be used in the proper application of CEQA's environmental review requirements. The current State CEQA Guidelines are found in Title 14, Chapter 3 of the California Code of Regulations. Furthermore, the Board of Supervisors has adopted the County Administrative Supplement to CEQA, which specifies the specific procedures the County uses in complying with CEQA and CEQA Guidelines.

1.3 Lead, Responsible and Trustee Agencies

Under CEQA, the Lead Agency is the public agency that has the principal authority for approving or carrying out the project. Therefore, the County or Ventura is the Lead Agency for the subject "project."

Entitlements required by Ventura County include: General Plan amendment, Piru Area Plan amendment, zone change, Subdivision Maps, Residential Planned Development Permits, and Development Agreements.

A "responsible agency" refers to a public agency within the State of California, other than the Lead Agency, that has discretionary approval authority over a project, or portion thereof. Responsible agencies include:

- ▶ Regional Water Quality Control Board (RWQCB) – Responsible for issuance of National Pollutant Discharge Elimination System (NPDES) permits for grading activities.
- ▶ California Department of Transportation (Caltrans) – Responsible for maintenance of any-offsite improvements to State Highway 126 and would be responsible for issuance of encroachment permits for any work in the State highway right-of-way.
- ▶ Local Agency Formation Commission (LAFCO) – Responsible for formation of a new Community Services District (CSD) or County Service Area (CSA) for the Piru Community

A "trustee agency" refers to a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California. Trustee agencies include:

- ▶ The California Department of Fish and Game (CDFG) - is a Trustee Agency for the subject project with regard to fish and wildlife, designated rare or endangered native plants, and to game refuges, and ecological reserves.

Additionally, an "affected" agency refers to public agencies that are neither responsible nor trustee agencies, but would provide services to the project, or would be impacted by the project. The following is a limited list of affected public agencies and the services they would provide or a description of how they may be affected by the proposed project:

- ▶ Fillmore Unified School District (FUSD) – Operates K-12 public schools, including Piru School
- ▶ County of Ventura and dependent districts:
 - Fire Protection District – Provides Fire Protection to the Piru Community.
 - Watershed Protection District – Responsible for flood control and ground and surface water quality and quantity. The District will issue flood control permits for any development within the 100-year flood fringe area.
 - Library Services District – Responsible for operating the Piru Library.
 - Water Works District 16 – Responsible for operating the Piru Wastewater Treatment Plant.
 - Additionally, Ventura County provides park and recreation services for Warring Park (Parks Department), provides law enforcement services (Sheriff's Department), is responsible for County road maintenance and would be responsible for issuance of encroachment permits for work in County Road right-of-ways (Transportation Department) and provides building and safety services and zoning enforcement (Resource Management Agency).
- ~~(Fire Protection District and Watershed Protection District) – Provides park and recreation services, law enforcement services, fire protection, road maintenance, flood control, health care, building and safety, zoning enforcement, and miscellaneous services~~
- ▶ United Water Conservation District (UWCD) - Operates aquifer recharge basins adjacent to the project site
- ▶ Ventura County Air Pollution Control District (APCD) – Has regulatory authority for protection of air quality within Ventura County. APCD enforcement staff would respond to construction dust complaints under Rule 51 of the APCD Rules and Regulations.
- ▶ Redevelopment Agency of the County of Ventura – A redevelopment agency was established in Piru after the 1994 Northridge Earthquake caused extensive damage. The redevelopment agency uses tax increment financing to promote economic recovery and enhance the Piru Community's infrastructure. The Rieder project (Component A) and portions of Component D (Gillmore, Chessani and France properties) are located within the Piru Redevelopment Area. A portion of tax increment funds must be used to provide affordable housing.

1.4 Scope of EIR

In accordance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) was prepared and distributed for review by affected agencies and the public in December 2004. Based on the Initial Study and comments received during the NOP public review period, the following issues will be addressed in this EIR:

- | | |
|--|--|
| 1. Air Quality | 11. Sewage Treatment |
| 2. Surface Water Quality | 12. Utilities – Gas Pipeline Safety and Telephone Services |
| 3. Biological Resources | 13. Law Enforcement |
| 4. Agricultural Resources | 14. Education |
| 5. Scenic Resources | 15. Recreation |
| 6. Historical Resources | 16. Community Character |
| 7. Flooding, Erosion and Drainage Facilities | 17. Growth Inducement |
| 8. Noise | 18. Project Alternatives |
| 9. Transportation and Circulation | 19. General Plan Consistency Analysis |
| 10. Groundwater Quantity and Water Supply Distribution | |

1.5 Areas of Known Controversy

The County of Ventura received 4 letters and communications in response to the Notice of Preparation for this EIR (see EIR Appendix 8.2). Within those letters, the following issues were raised:

- Higher density/lower income housing on Main Street may be undesirable to some community residents and may result in an unattractive entrance to the Piru Community.
- Proposed enhanced Main Street Plan may result in bicycle and pedestrian safety issues and may not be adequate to accommodate ultimate traffic conditions.
- Air quality may deteriorate as traffic intensity increases.
- Potential danger to residents from the gas company metering facility.
- Increased use of water softeners from new development may adversely impact sewer plant discharge water quality.
- The location of new development may make it more difficult to safely evacuate residents from the proposed developments to high ground in the event of catastrophic failure of Santa Felicia Dam.
- Public parks are even more over capacity if Rancho Sespe Farmworker Housing project is included in the analysis.
- New schools to serve the proposed development area cannot be constructed in the dam inundation area.
- Proposed development may interfere with wildlife migration corridor.
- Proposed development may exacerbate existing unsafe intersection of Main Street at Highway 126.
- The historic Maltby house and surrounding trees on the Reider project should be preserved.

- Residents of Piru are concerned with the scope of the proposed housing projects which could result in a 78% increase in the size of the existing Piru Community.
- Proposed project may contribute to worsening of student drop-off/pick-up circulation problem at Piru School on Center Street.

2. Project Description

2.1 Project Applicants

Component A
John Rieder
786 Via Terrado
Camarillo, CA 93010

Component C
James Finch
900 Orange Road
Ojai, CA 93023

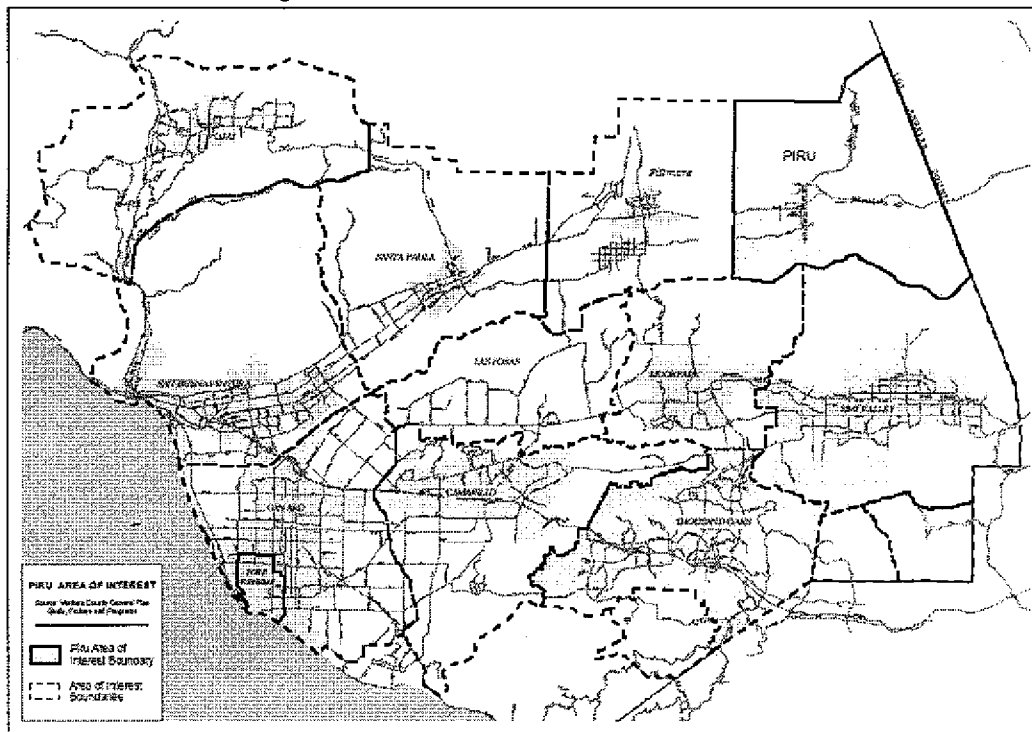
Component B¹
Dana Levy
2550 Willow Lane
Thousand Oaks, CA 91361

Component D²
County of Ventura
c/o Planning Division-RMA
800 South Victoria Avenue
Ventura, CA 93009

2.2 Project Location

Piru is an unincorporated community located within the Piru Area of Interest, about 6 miles east of the City of Fillmore within the Santa Clara River Valley in eastern Ventura County. The Piru Area of Interest is shown on Figure 2-1. The existing Piru Community comprises about 155 acres. The proposed Piru Expansion Area totals 62.275 acres and is comprised of four component areas. The existing Piru Community and the proposed expansion Area are shown on Figure 2-2.

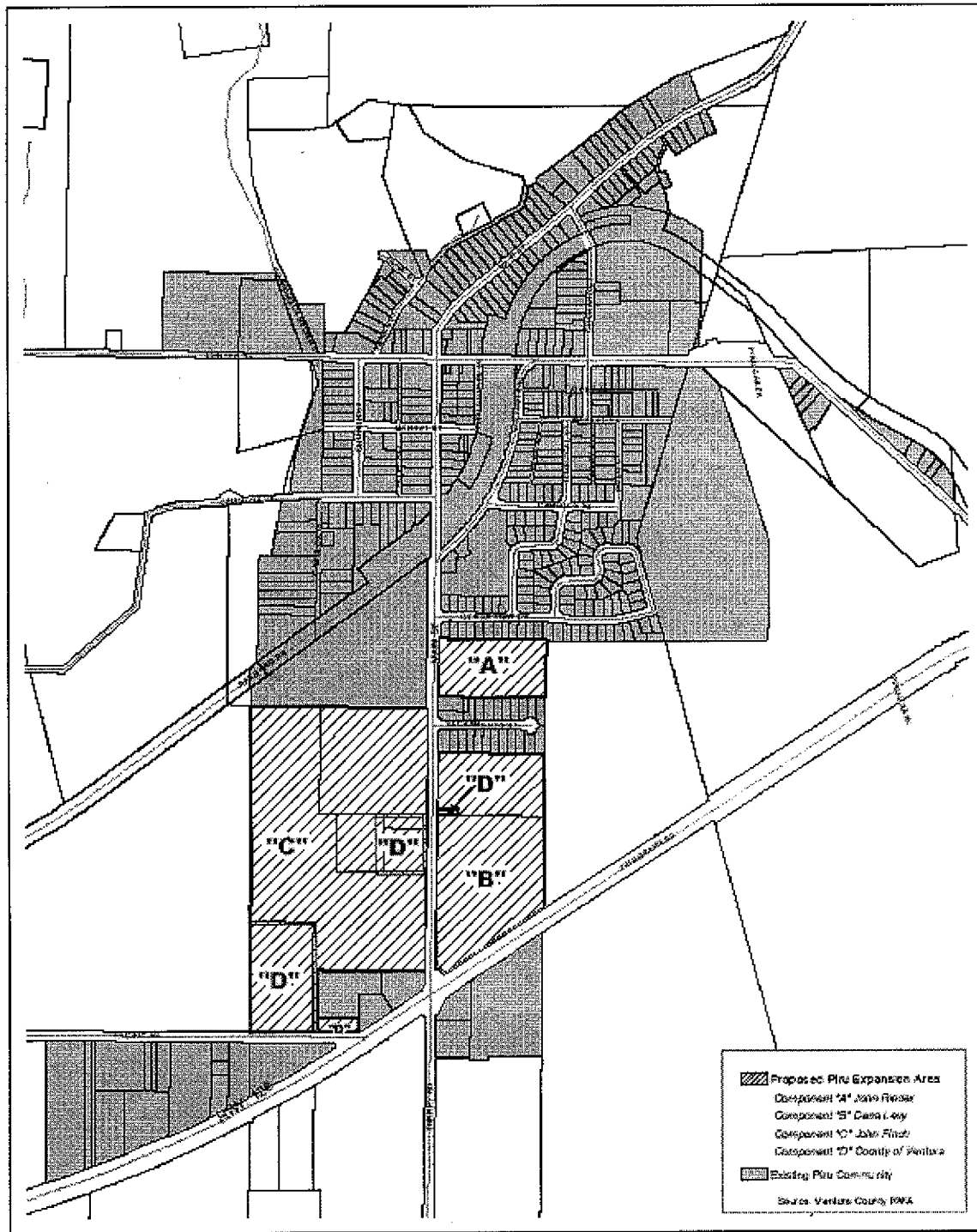
Figure 2-1 Piru Area of Interest



¹ Subsequent to the release of the Draft EIR, applicant Dana Levy withdrew his request for a General Plan Amendment, zone change, tract map and planned residential development permit.

² There is no applicant for Component D. The Board of Supervisors directed that this area be included in the Piru Area Plan update. The RDA has agreed to fund the prorated cost of this portion of the study. The Planning Division is responsible for preparing and evaluating a plan for this area.

Figure 2-2 Existing Piru Community and Proposed Piru Expansion Area



2.3 Project Objectives

The project is a focused update to the County general plan to fulfill the following objectives:

1. Increase the housing land inventory for unincorporated Ventura County to help meet its long-term regional housing objectives.
2. Provide for a diversity of housing opportunities within a 62-acre proposed Piru Expansion Area.
3. Develop a cohesive plan for this area that integrates the new development with the existing Piru Community.
4. Update the goals, policies and programs of the Piru Area Plan to:
 - ▶ Ensure that any new Piru Community expansion will be provided with an adequate level of public services and does not exacerbate public facility and service levels currently provided to the Piru Community.
 - ▶ Ensure the enhancement of Main Street as the primary entrance to the Piru Community
 - ▶ Encourage the revitalization of the Piru commercial core by permitting mixed use development and allowing a greater range of allowable uses for the Heritage Valley Inn property.
 - ▶ Ensure that new residential neighborhoods reflect the historic architectural character of the existing Piru Community
 - ▶ Limit incompatibility between agricultural operations and adjacent new development through the development of adequate buffer areas
 - ▶ Ensure that the proposed new development will result in a new public park to help meet the recreational needs of the Piru Community

2.4 Project Characteristics

Proposed Development Projects

The proposed project would result in a 62-acre expansion of the Piru Community to accommodate up to 394 dwelling units on several properties. As indicated previously, the proposed Piru Expansion Area consists of four components. Land ownership pattern is illustrated in Figure 2-3.

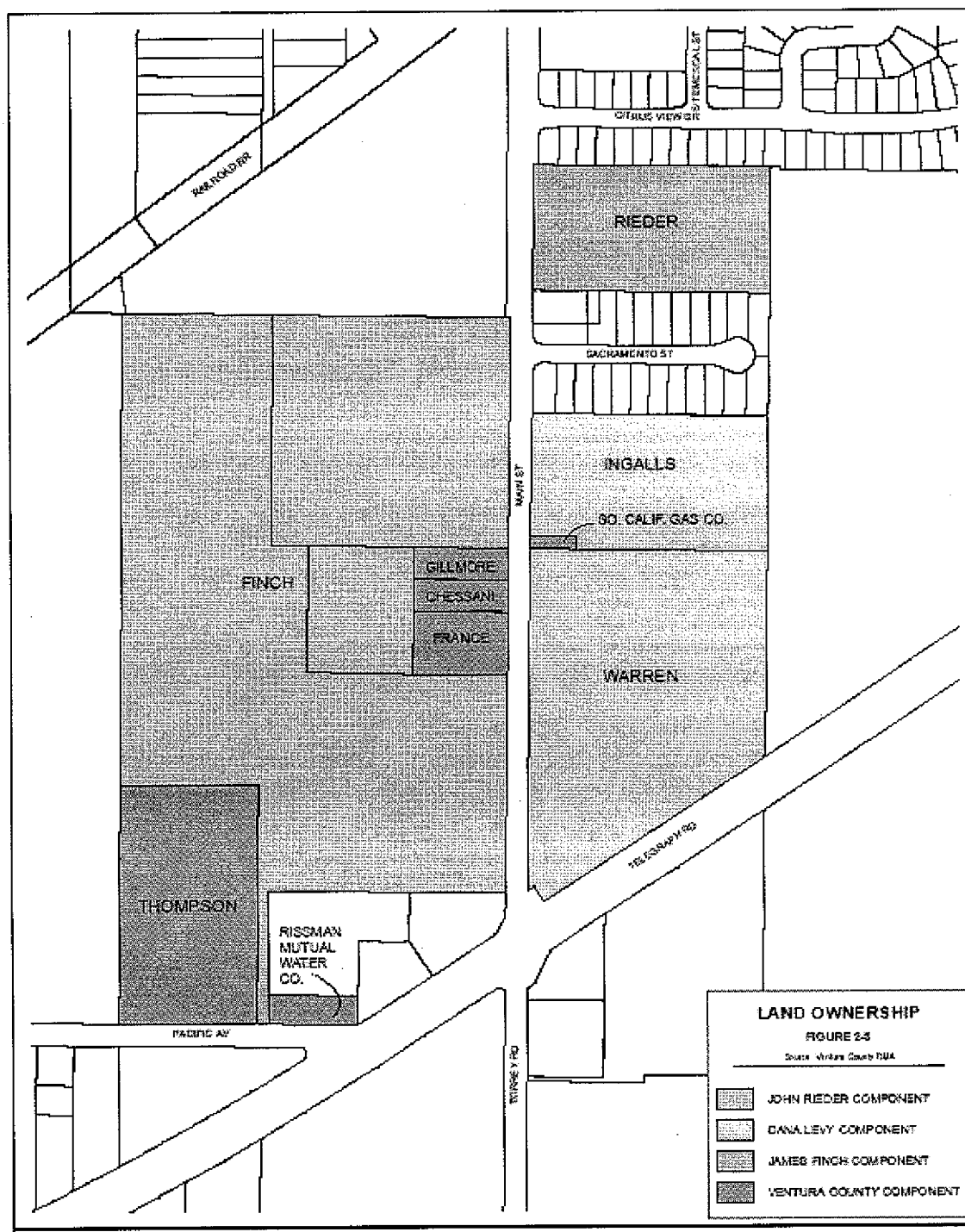
Proposed subdivision tract maps (where they exist) are shown in Figure 2-4 and Figure 2-5. The four components are described as follows:

Component A

Applicant: John Rieder

Land Owner, Assessor's Parcel Number & Acreage	John and Nalena Rieder Edward L. Lenk	APN: 056-0-19-01	5.0 Acres
Acreage Total for Component A:	5.0 acres		
	Existing	Proposed	
General Plan Designation:	"Agricultural"	"Urban"	
Piru Area Plan Designation:	"Agriculture"	"R-15" (Residential, 10-15 dwelling units/acre)	
Zoning:	"AE" (Agricultural Exclusive)	"RPD-12" (Residential Planned Development, 12 units per acre)	
Subdivision/Planned Development:	60 multi-family units (12 units per acre average) per TT-5479 and Residential Planned Development Permit (Figure 2-4)		

Figure 2-3 Land Ownership



Component B

Applicant: Dana Levy:

Land Owners, Assessors Parcel Numbers & Acreage:	Kurt H. Ingalls and Thomas E. Ingalls	APN: 056-0-19-05	5.33 acres
	Victor Warren	APN: 056-0-19-09	11.17 acres
Acreage Total for Component B:	16.5 acres		
	Existing	Proposed	
General Plan Designation:	"Agricultural"	"Urban"	
Piru Area Plan Designation:	"Agriculture"	The applicant has requested "R-15" (Residential 10-15 dwelling units/acre).	
Zoning:	"AE" (Agricultural Exclusive)	The applicant has requested "RPD-15U" (Residential Planned Development, 15 units per acre).	
Subdivision/Planned Development:	104 single-family detached residential units (6.3 dwelling units per acre average) per TT-5533 and Residential Planned Development Permit. Proposed lots range from 3,952 square feet to 7142 square feet (4,170 square feet average). The site plan also indicates 1.7 acres would be reserved for a landscape lot and detention basin. (Figure 2-5) <u>Note that Dana Levy withdrew his application for a General Plan Amendment, Zone Change, Tract Map and Planned Residential Development on July 31, 2006</u>		

Component C:

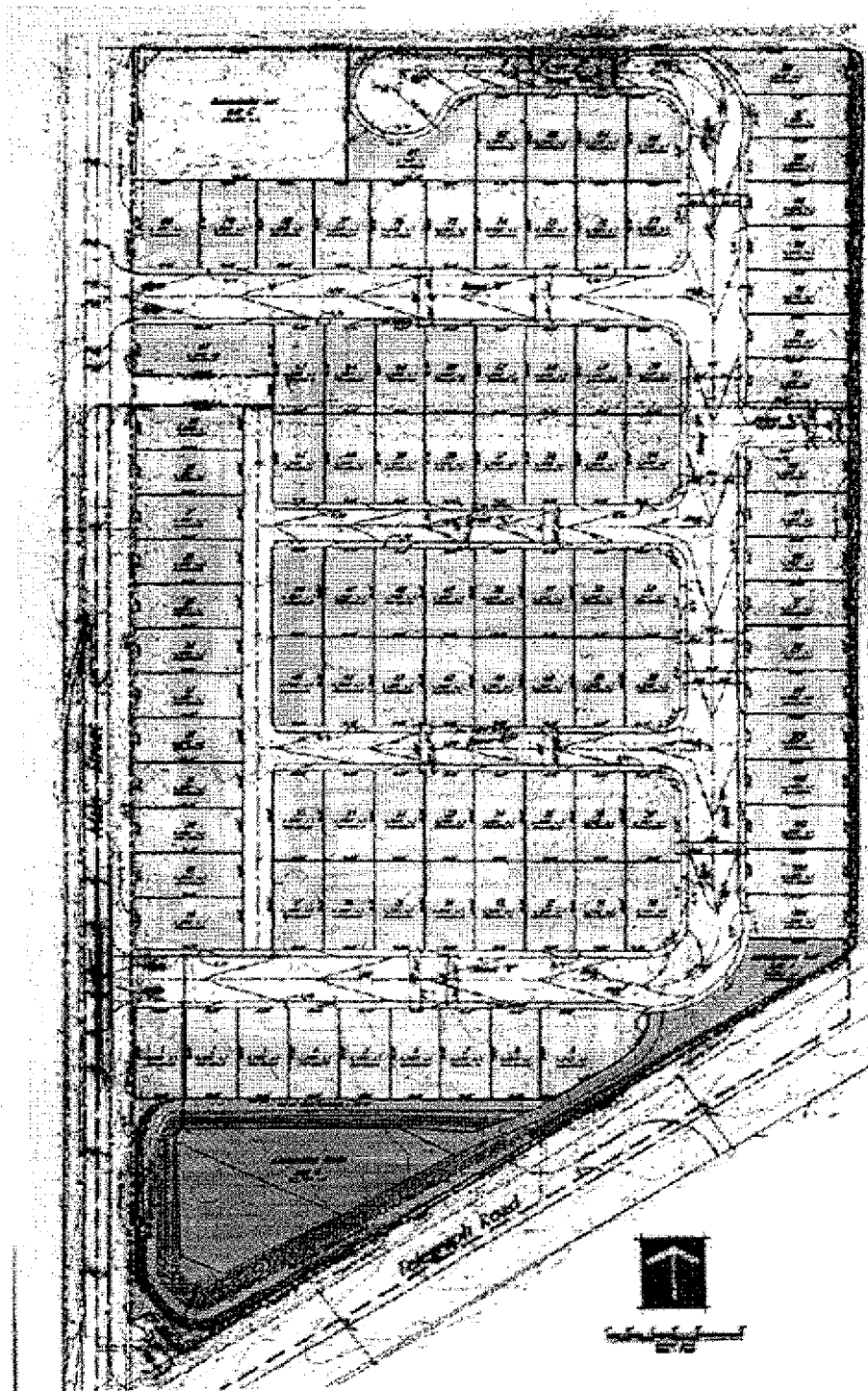
Applicant: James Finch

Land Owner, Assessors Parcel Numbers & Acreage:	James P. Finch-Leah H. Finch Trust	APNs: 56-0-18-02, -08 and -12	32.8 acres
Acreage Total for Component C:	32.8 acres		
	Existing	Proposed	
General Plan Designation:	"Agricultural"	"Urban"	
Piru Area Plan Designation:	"Agriculture"	"R-6" (Residential, 4-6 dwelling units/acre).	
Zoning:	"AE" (Agricultural Exclusive)	"RPD-6" (Residential Planned Development, six units per acre).	
Subdivision/Planned Development:	A tract map application has not yet been submitted, however, the applicant estimates approximately 139 single-family units and 46 multi-family units (apartments and duplexes) for a total of 185 dwelling units (5.6 dwelling units per acre average). Additionally, the applicant will propose a park of indeterminate size and location. <u>Subsequent to the release of the Draft EIR Mr. Finch submitted a concept plan for development of his property. This concept is described in the Project Alternatives Chapter.</u>		

W A S H I N G T O N S T R E E T



Figure 2-5 Dana Levy Site Plan



Component D

Applicant: County of Ventura

Land Owners, Assessors Parcel Numbers & Acreage:	Fred Thompson	APN: 56-0-18-01	5.44 acres
	Rissman Mutual Water Company	APN: 56-0-18-07	0.43 acres
	Richard J. and Bonnie R. Gillmore	APN: 56-0-18-15	0.5 acres
	<u>Reynaldo and Donna K. Chessani</u> <u>Reynaldo-Donnak</u>	APN: 56-0-18-16	0.5 acres
	Roger L. France	APN: 56-0-18-17	1 acre
	Southern California Gas Company	APN: 56-0-19-06	0.09 acres
Acreage Total for Component D:	7.96 acres		
	Existing	Proposed	
General Plan Designation:	"Agricultural"	"Urban"	
Piru Area Plan Designation:	"Agriculture"	"R-6" (Residential, 4-6 dwelling units/acre) and "Highway Commercial" for APN 56-0-18-07	
Zoning:	"AE" (Agricultural Exclusive)	"RPD-6U" (Residential Planned Development, 6 units per acre) and CPD for APN 56-0-18-07	
Subdivision/Planned Development:	No subdivision or development is proposed at this time. The maximum potential development under RPD-6U is 45 dwelling units (5.6 dwelling units per acre average). Parcel 56-0-18-07, if developed commercially, could accommodate up to 2,814 square feet of commercial space.		

Components A, B, C and D Combined

	RESIDENTIAL ACRES	POTENTIAL DWELLING UNITS	COMMERCIAL ACRES	POTENTIAL COMMERCIAL FLOOR AREA	TOTAL ACRES
TOTALS FOR COMPONENTS A, B, C AND D	61.83	394	0.433 AC.	2,474 SQ. FT.	62.263

The Piru Community currently contains an estimated 502 dwelling units and has an estimated population of 1,703 (Planning Division estimate, June 2004).

The proposed Piru Expansion Area (Components A, B, C and D) comprises 62.3 acres. Approval of all General Plan Amendments and Subdivisions/Planned Developments as proposed within the Piru Expansion Area would result in 394 potential new dwelling units added to the Piru Community. At 3.66 persons per occupied dwelling unit (per 2000 Census), these dwelling units would be expected to generate 1,442 additional residents in the Piru Community.

Other Piru Area Plan Proposed Changes

The Piru Area Plan Update Committee proposes a number of changes to the Piru Area Plan goals, policies and programs. The proposed changes are provided in Appendix 8.3. The major changes (those that may have potential environmental impacts, or have the potential to mitigate environmental impacts) are described below:

- A new policy would require development of an enhanced Main Street south of the railroad right-of-way that would include two travel lanes, parking lanes on both sides of the roadway (except in front of the packing plant and the block from Highway 126 to the first public street), a landscaped center median from Highway 126 to the first public street, landscaped parkways and combined bicycle/pedestrian pathways on both sides of the roadway, and "pedestrian friendly" intersections with bulb-outs. Total right-of-way would be 72 to 84 feet (existing right-of-way is 60 to 74 feet).
- A new program would direct the Planning Division to prepare an amendment to the County Zoning Ordinance that would permit a mix of residential and commercial uses in the CBD Overlay Zone District. Since an ordinance has yet to be drafted, development standards and limitations have not been established. Thus, the number of potential dwelling units that might be added to the CBD Overlay Zone District is unknown. However, given the lack of undeveloped parcels within this zone, the opportunity to develop residential units is relatively limited. For purposes of this document, it is assumed that not more than 50 dwelling units could be constructed in the Piru Community as a result of this potential ordinance change. More detailed environmental analysis may be necessary when the proposed ordinance is prepared and presented to decision-makers.
- The Heritage Valley Inn would be re-designated from "Hotel" to "Commercial" and the "Hotel" land use designation would be deleted.
- A new "Highway Commercial" designation would be created and applied to the existing "Commercial" designated properties located at the northwest corner of Main Street and Highway 126.
- An existing policy which requires residential development to have an overall mix of 85% single-family and 15% multi-family based on total housing units – would be deleted.
- A new policy would require a buffer between the proposed new development and adjacent "Agriculture" designated lands to minimize land use conflicts.
- A new policy would require a landscaped setback between the new development and Highway 126 to minimize noise and soften visual impacts.
- A new policy would require development of a second community park site within or adjacent to the Piru Community.
- The Piru Community Design Guidelines would be revised to add guidelines for residential development and for development along Main Street, south of the railroad right-of-way.

Additionally, the following properties would be re-designated ~~Re-designate the following three areas within and adjacent to the proposed expansion area from "Existing Community" to "Urban" on the Countywide General Plan:~~

- a) Habitat for Humanity Tract: Approximately 5 acres of residential property along both sides of Sacramento Street, east of Main Street (APN Nos. 056-0-230-01, -02, -03, -04, -05, -06, -07, -08, -09, -10, -11, -12, -13, -14, -15, -16, -17, -18, -19, -20, -21, -22, -23, and -24) and an adjacent residential parcel APN No. 056-0-230-01.
- b) Approximately 16.1 acres of industrial designated property located between Pacific Avenue and SR 126 (APN Nos. 056-0-210-05, -06, -07, -10, -11, -12, -13, -14, -15, -16, -17, -23, -24, and -25)
- c) Approximate 7.43 acres of industrial designated property located southeast of SR 126 and Torrey Road (APN Nos. 057-0-020-02, -12, and -13)

- d) Approximately 4.25 acres of commercial designated property located at the northwest corner of Highway 126 and Main Street. (APN Nos. 056-0-18-18, -19, and -20)

Cumulative Development

Based on 2000 census block data and County building completions as of June 2004, the Piru Community currently has approximately 502 dwelling units and a population of 1,703. Census data indicates population per household was 3.66 persons per occupied housing unit within the Piru Community.

The existing Piru Community contains about 31.5 acres of undeveloped residential land. Build-out of all the vacant undeveloped residentially-zoned parcels within the existing Piru Community could potentially result in development of an additional 176 single-family and 37 multi-family residential units. Additionally, proposed Piru Area Plan policy 3.2.3-2 would allow development of up to 50 multi-family dwelling units within the Commercial Town Center area. The largest vacant residential parcel is the Camulos Orchard property which includes about 20 acres of orchard, currently zoned R-P-D-6u. Potentially this property could be developed with about 120 dwelling units. Development would require a Planning Commission approved Planned Development Permit and a Tract Map and 100-year flood plain issues would need to be adequately addressed. Thus, full buildout of the existing Piru Community, based upon existing zoning and existing General Plan designations is expected to cumulatively generate up to 263 dwelling units.

The Piru Community contains approximately 3.5 acres of vacant undeveloped commercial land and 12 acres of vacant undeveloped industrial land. If developed, these areas could potentially accommodate approximately 20,000 square feet of commercial space and 104,000 square feet of industrial floor area. At an average of two employees per 1,000 square feet of floor area, build-out of the vacant commercial and industrial properties in Piru would be expected to generate approximately 248 additional employees.

In addition to the above, there are several approved, proposed, or reasonably foreseeable future development projects in the vicinity of Piru, which are listed in the following table. In order to avoid double counting, only those projects that are not included in the Piru Community buildout (described above) are added to the cumulative buildout potential noted above.

CUMULATIVE PROJECTS LIST			
NAME	USE	LOCATION	STATUS
Projects Located Within the Boundary of the Piru Community			
(These projects are not being added to the cumulative development potential to avoid double counting)			
<u>ABS & S Parcel Map</u>	<u>4 single-family units</u>	<u>North Main Street</u>	<u>In process</u>
<u>Gaiser Enterprises Subdivision</u>	<u>16 single-family units</u>	<u>East Center Street</u>	<u>In process</u>
<u>Finch Apartment Project</u>	<u>13 multi-family dwelling units</u>	<u>East Center Street</u>	<u>Application has been withdrawn due to lack of activity</u>
<u>Piru Junction Retail Center</u>	<u>23,334 square foot retail commercial center</u>	<u>SR-126, west of Main Street</u>	<u>Approved, however entitlement has lapsed</u>
<u>Commercial Town Center Mixed-Use Residential</u>	<u>Up to 50 multi-family units</u>	<u>Within the Community Business District</u>	<u>Potential redevelopment pursuant to proposed Piru Area Plan policy 3.2.3-2</u>

<u>Projects Located Outside the Boundary of the Piru Community But Within the Piru Area of Interest</u>			
<u>NAME</u>	<u>USE</u>	<u>LOCATION</u>	<u>STATUS</u>
<u>La Verne Nursery</u>	<u>45-employee wholesale plant nursery</u>	<u>West Camulos Street</u>	<u>Approved</u>
<u>Lake Piru Recreation Area</u>	<u>387 enhanced campsites and other recreational improvements</u>	<u>Piru Canyon Road</u>	<u>Approved, however entitlement has lapsed</u>
<u>Cabrillo Economic Development Corporation Farmworker Housing Complex</u> ¹	<u>35-70 family farm worker housing units</u>	<u>East Center Street</u>	<u>Applicant has been unable to reach agreement with the land owner regarding the value of the farmworker housing site</u>
<u>Rancho Temescal</u> ²	<u>127 single-family dwelling units, 19 farmworker housing units, a school, and a park</u>	<u>North of Piru Community</u>	<u>Application for General Plan Screening submitted.</u>

While not within the Piru Community, the following proposed or under development projects may impact the community:

- ~~Cabrillo Economic Development Corporation hopes to develop a farmworker housing project on Center Street, just east of the community. This project could result in 35-70 farmworker family residential units. This project would require a Planning Commission-approved Planned Development Permit.~~
- ~~The United Water Conservation District has adopted a master plan for expansion of recreational facilities at Lake Piru. These include: improved RV camp sites, new day use facilities, new camp store, expanded restaurant, new clubhouse/administrative building, additional parking, and landscape enhancements. Long term plans may include development of guest ranch and equestrian facilities at Lisk Ranch, and development of a special event area. County land use permits have been issued but proposed improvements have not yet taken place.~~
- ~~La Vern Nursery is developing a wholesale plant nursery on 42 acres located just west of the Piru Community on Center Street and Camulos Street. The project involves 45 employees, and an average of six truck trips per day.~~

Based on the above information, the total residential potential in and around the Piru Community, but outside the project area, based upon current General Plan and Zoning designations and including both the Cabrillo farmworker project and the Rancho Temescal project is 480 dwelling units (1,757 potential residents at 3.66 persons per dwelling unit).

When this total is added to the number of dwelling units of the proposed project (Piru Expansion Area), the combined cumulative total is 872 dwelling units, with an estimated residential population of 3,192 persons.

¹ At the time the Notice of Preparation for this EIR was prepared, Cabrillo Economic Development Corporation had filed a H.O.M.E. grant request from Ventura County for 35 to 70 farmworker dwelling units located on East Center Street, just outside the Piru Community, but within the Piru Area of Interest.

² The owner of Rancho Temescal filed a General Plan Screening application in October 2006 for up to 146 dwelling units. While this project was considered too speculative to be included when the Draft EIR was initially prepared, the Rancho Temescal project is now included to provide a more conservative cumulative buildout assessment

3. Summary of Impacts and Alternatives

The following sections summarize the impacts, mitigation measures and alternatives as discussed in detail in chapters 4, 5 and 6:

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
AIR QUALITY			
Local Air Quality Impacts – Fugitive Dust Emissions The proposed project is expected to generate fugitive dust emissions during the grading and construction phase	AQ-1 The following dust control procedures shall be implemented during the projects' construction phase: (a) The area disturbed by clearing, grading, earthmoving or excavation shall be minimized to prevent excessive amounts of dust. (b) Regular ground-wetting of roads and graded areas (at least twice daily with complete coverage on all active areas). The use of environmentally safe chemical dust palliatives should be used, if directed by the APCD. (c) All trucks shall be required to cover their loads as required by California Vehicle Code §23114 (d) Adjacent streets shall be swept at the end of each work day, if visible soil material is carried over to adjacent streets. (e) During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties) all clearing, grading, earth moving and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive. (f) Signs should be posted limiting on-site speed limits to 15 mph. (g) Prior to initiation of grading, all adjacent homes will be provided with appropriate phone numbers in the event of dust complaints. These numbers shall include the site superintendent/supervisor as well as the APCD Compliance Division, APCD's 24-hour complaint line and the Planning	Yes / applicant, APCD	None.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Regional Air Quality - Ozone Precursors The project's overall combined air quality impacts would exceed the 25-lbs/day thresholds for ROG and NO_x, as described in the 2003 Guidelines (none of the individual components would individually exceed the threshold).	<u>Division condition compliance personnel.</u> (h) Use of other Best Management Practices (BMP's), as determined necessary by APCD. AQ-2 The applicants shall promote alternative modes of transportation as follows: (a) Applicants shall fund construction of an enhanced Main Street Plan that incorporates the following: (1) Construction of a bicycle/ pedestrian pathway along Main Street from Highway 126 to connect to existing sidewalks north of the railroad tracks. (2) Construction of bus turnouts and covered waiting areas on each side of Main Street, at locations to be determined by the Public Works Agency, in consultation with the Ventura County Transportation Commission. (3) Construction of bulb-outs and pedestrian-activated signal to facilitate safe pedestrian crossing of Main Street. (b) Internal street systems of proposed subdivisions shall be designed to encourage pedestrian and bicycle transportation by: (1) Incorporation of pedestrian friendly design, including traffic calming mechanisms (such as traffic circles and bulb-outs). (2) Separation of pedestrian and vehicular traffic through the use of landscaped pathways. (3) Incorporation of an internal bicycle/pedestrian pathway network to facilitate bicycle and pedestrian access to schools, parks, commercial centers and existing and planned community pathways (such as the Main Street bicycle/pedestrian pathway and railroad bicycle/pedestrian pathway), wherever feasible. (4) Bicycle locker or lockable storage areas shall be provided at all commercial retail and multi-family and community park sites within the proposed development area. AQ-3 Applicants shall submit an energy conservation plan designed to reduce energy consumption by the following	Yes / applicant, VCTC, Public Works Agency, Planning Division, APCD	Measures AQ-2 and AQ-3 APCD would reduce ROG emission reductions by 1.9% and NO_x reductions by 5.4%. The residual project emissions would be 51.99 lbs/day of ROG and 52.7 lbs/day of NO_x, which would still exceed the significance threshold standard of 25 lbs/day. However, a project that implements a 3-year buy-down (as required by measure AQ-4) is considered to have reduced the significant project environmental impact to a less than significant level (2003 Guidelines).

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Cumulative Regional Air Quality: The population generated by the project would exceed the AQMP population forecast for the Piru Growth Area, and therefore the proposed project would be inconsistent with the AQMP. Additionally, until the AQMP is revised, the project would technically be in violation of Piru Area Plan Policy 1.7.2-1	means: (a) All buildings shall incorporate energy-saving design solutions to reduce energy consumption by at least 20 percent below Federal guidelines as specified in Title 24 of the Code of Federal Regulations. This may be accomplished through such measures as improved insulation, double-paned windows, more efficient heating/ventilation, skylights, use of solar or low emission water heaters and/or use of compact fluorescent light bulbs. (b) New technology, such as solar electric generation systems or residential fuel cells, shall be showcased in model homes and made available as an option to buyers. (c) Shade trees shall be used to reduce heat build-up on structures to reduce energy used for cooling. (d) Each homeowner shall be provided with an electric or battery-powered lawnmower and edger. Conditions, covenants and restrictions shall prohibit the use of gasoline-powered landscape maintenance equipment by homeowners. AQ-4 Applicants shall contribute to an off-site transportation demand management (TDM) fund to be managed by the APCD. The formula for calculating this fee is established by the 2003 Guidelines (see Appendix B-5). Applicants would be required to pay for NO_x emissions in excess of the 25 lbs per day standard over a three-year period. The 2005 cost is calculated at \$8.77 per pound of NO_x. AQ-5 APCD shall revise the AQMP population forecast for the Piru Area of Interest in order to be consistent with any Board of Supervised approved General Plan Amendment for the Piru Expansion Area. AQ-6 The Board of Supervisors shall amend Piru Area Plan Policy 1.7.2-1 to add the phrase "unless overriding considerations are cited by the decision-making body".	Yes / APCD, Board of Supervisors	None, once the AQMP is amended.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
SURFACE WATER QUALITY			
Sediment Discharge Erosion and sediment discharge could occur if heavy rains occur during the construction phase	A stormwater pollution control plan (SWPCP) is required pursuant to RWQCB. No further mitigation is required.	Yes / RWQCB, PWA	None
Urban Runoff Discharge Urban stormwater runoff could transport hydrocarbons from street paving, motor oil, detergents and other pollutants into the storm drain system and ultimately into the Santa Clara River.	A Ventura County Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) is required and will require BMPs including installation of filters at the entrance to stormwater detention basins to trap oil and grease and will require outlets to include various filtration mechanisms to capture any remaining pollutants. No further mitigation is required.	Yes / RWQCB, PWA	None
Piru Wastewater Treatment Plant Expansion The Piru Wastewater Treatment Plant must be expanded and upgraded to serve the proposed project. Increase volumes of effluent could adversely impact Hopper Creek in the event of a spill.	A spill response plan will be implemented in the event of a spill. The planned upgrade to the treatment plant will cause effluent to be treated to tertiary standards, therefore impacts of a spill while potentially larger in volume, would be expected to have fewer adverse consequences. No further mitigation is required.	Yes / RWQCB, PWA	None
BIOLOGICAL RESOURCES			
Sensitive Species Burrowing owls and other protected birds may be impacted during the grading and site preparation phase of the project.	BR-1 Prior to recordation of a tract map, a special-status wildlife survey shall be performed in accordance with CDFG guidance or as follows: During both the wintering and nesting seasons a qualified biologist shall conduct surveys for burrowing owls in potential habitat areas prior to construction in accordance with guidelines described in the <i>CDFG Staff Report on Burrowing Owl Mitigation, 1995</i> . Winter surveys shall be conducted between December 1 and January 31, and the nesting season survey shall be conducted between April 15 and July 15. If burrowing owls are detected within the proposed disturbance area, CDFG shall be contacted to develop and implement a mitigation plan to protect owls and their nest sites.	Yes / applicant, CDFG	None

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	BR-2 Prior to construction during the migratory bird/raptor nesting season, a survey for active nests shall be conducted by a qualified wildlife biologist at the site no more than two weeks prior to any scheduled development or grading. If active nests of any MBTA-protected bird species are located, construction within 500 feet of nest trees (e.g. Eucalyptus, Monterey Pine, or landscape trees) shall be limited to the time period after young have fledged and prior to the next season's breeding period. This is generally September 1 to February 1, although a qualified biologist shall confirm that breeding/nesting is completed and young have fledged. Nest trees shall only be removed outside of the nesting season, or after a qualified wildlife biologist verifies that the nest is empty and no longer used by a raptor.		
AGRICULTURAL RESOURCES Loss Of Prime Agricultural Soils The project will result in the direct loss of <u>57.3</u> <u>62.3</u> acres of prime agricultural soils and may indirectly impact an additional 6.5 acres for an agricultural buffer, stormwater detention basins and access road construction. Construction Dust Impacts During the grading and construction phase, construction dust may adversely impact adjacent farm operations by reducing photosynthesis and spreading plant disease (applicable to Finch and Thompson properties).			
	AR-1 In the event that <u>topsoil removal and export is required as part of any project grading operation</u>, topsoil from the project site shall be stockpiled and incorporated into parks and landscaped areas within the project. Any excess topsoil shall be offered to an offsite agricultural operation as a soil amendment.	Yes / applicant, <u>PWA, GSA</u>	Even with all feasible mitigation, the project would still result in the loss of up to <u>63.8</u> <u>68.8</u> acres of prime agricultural soils. A statement of overriding considerations will be required if the project is approved.
	AR-2 During the grading and construction phase, on-site vehicle speed shall be limited to 15 miles per hour. AR-3 Graded and/or excavated inactive areas of construction shall be monitored by construction personnel at least weekly for dust stabilization. Soil stabilization methods, such as application of water and dust control materials, and roll compaction, shall be periodically applied to portions of the construction site that are inactive for over four days. AR-4 If grading and construction of the proposed project causes excessive dust deposition on agricultural crops, the grading contractor shall cooperate with the grower to wash the crops with water.	Yes, applicant	None

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Agricultural/Residential Land Use Conflicts (Applicable to Finch and Thompson properties which about agricultural development) The presence of residences in close proximity to agricultural operations diminishes the viability of commercial agriculture on the remaining agricultural properties due to curtailment or limitations on normal agricultural practices that may result in complaints related to noise, dust, pesticide over-spraying, odors, and other nuisances associated with normal agricultural activities. Additionally, farmers can expect increased trespass and resulting increase in vandalism, pilferage, and introduction of pests, disease and weeds from improperly maintained residential vegetable gardens and ornamental plants.	AR-5 A copy of the Ventura County Right-to-Farm Ordinance shall be provided to each homebuyer at the time of purchase. AR-6 A minimum 150-foot wide agricultural easement <u>buffer</u> area <u>with vegetative screen</u> and <u>eight foot high chain-link fence</u> shall be provided <u>along the property line</u> between adjacent <u>Agricultural designated land operations</u> and any new <u>housing units-residential or park land uses</u>. The 150-foot <u>easement buffer area</u> may include the following uses: • Roadways and driveways • Parking lots and garages • Landscape features (including the vegetation buffer described in Measure AR-7) • Storage sheds or open storage • Greenhouse structures (if venting is directed away from residential areas) • Fencing • Range cattle, sheep or similar livestock • Front yard setbacks • Drainage facilities (including stormwater detention basins) • <u>Hiking, bike or bridle paths</u> • Single use government, institutional, or educational or private facilities, where notification, agreements and operational accommodations between parties can easily occur <u>prior to spraying</u>. • Farm and produce stands where <u>notification between farmers and occupants can easily occur prior to spraying</u>. • Agricultural tourism in accordance with a CUP The <u>150 foot buffer</u> may <u>be reduced if</u>, prior to recordation of any tract map adjacent to existing Agricultural designated land, the developer shall obtains from the owner of the adjacent agricultural designated property an agricultural easement or enters into a contract with the grower to <u>compensate for increased farming costs or reduced revenues resulting from the need to modify standard, legal farming practices (e.g., when or how pesticides are applied, types of pesticides that are applied) due to potential conflicts associated with the development of the proposed residential</u>	Yes / applicant	None

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	project, subject to approval of the Agricultural Commissioner. The owners of the Finch property and the Thompson property may agree to waive the requirement for an agricultural easement/contract between the two properties if urban development of both properties is anticipated by both parties within three years. AR-7 The applicant shall install a vegetative buffer screen (shelter belt) in accordance with mitigation AR-6 that meets the following along the west property line and between the Finch and Thompson properties (to minimize potential land use conflicts and adverse effects associated with agricultural operations, including pesticide applications). The minimum requirements for the vegetative buffer are as follows: • The vegetative buffer shall consist of two staggered rows of trees/bushes characterized by foliage that extends from the base of the plant to the crown. • The two staggered rows shall be planted five feet apart and consist of minimum five-gallon plants at least six feet in height, planted 10 foot on center at the time of installation. • Trees and shrubs shall be vigorous, drought tolerant and shall have 50% to 75% percent porosity (i.e., approximately 50 to 75 percent of the vegetation is air space). • Plant height shall vary, in order to capture drift within four feet of ground applications. • A mature height of 15 feet or more is required for trees • Recommended plants include: Toyon (Heteromeles arbutifolia), Sugarbush (Rhus ovata), Laurel Sumac (Malosma laurina), and Italian cypress (Cupressus sempervirens). A landscape plan and a plan for long-term maintenance of the required vegetative buffer screen shall be submitted to the Planning Director for approval prior to recordation of the tract map. The vegetative buffer screen shall be planted prior to issuance of a zoning clearance for site grading. The owners of the Finch property and the Thompson property may agree to waive the requirement for an agricultural buffer between the two properties if urban development of both properties is anticipated by both		

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	parties. AR-8 To deter trespassing, pilferage and vandalism of agricultural crops, the applicant shall install an eight-foot chain link fence on the agricultural side of the vegetative buffer screen described in measure AR-7		
HISTORICAL RESOURCES			
Impacts to Historical Resources - Rieder Component The proposed project would result in the destruction of a residence which was constructed in conjunction with the turn-of-the-century hamlet of Duneden. Additionally, the project would result in the destruction of several mature trees, including one heritage sized silk oak tree.	HR-1 The Rieder project shall be re-designed to preserve the Maltby residence at its current location, or relocated to another location if approved. The revised site plan shall be reviewed by the Ventura County Cultural Heritage Board. Notwithstanding the above, the Maltby residence may nonetheless be relocated or demolished if the applicant prepares a study which demonstrates to the satisfaction of the Ventura County Cultural Heritage Board that the Maltby residence has minimal historical, cultural or architectural significance. HR-2 A qualified arborist shall be employed to evaluate all mature trees on the Rieder site. All healthy mature trees, particularly those in the vicinity of the Maltby residence, shall be incorporated into the project design. The Planning Director may authorize destruction or relocation of one or more healthy mature trees, if he determines the removal will result in a superior project design.	Yes, applicant, Cultural Heritage Board	Redesign of the Rieder project to save the Maltby residence could result in the loss of three to six dwelling units and/or relocation of driveways.
Impacts to Historical Resources - Finch Component The project may result in the destruction of several existing farm structures, including a circa 1915 craftsman-style farmworker housing unit.	HR-3 Any tract map for the Finch component shall be designed to incorporate the existing 1915 farmworker housing unit into the project design. If approved by the County Parks Department and the Cultural Heritage Board, the farmworker house may be relocated to the proposed park to be used as a caretaker residence. Notwithstanding the above, the 1915 farmworker residence may nonetheless be demolished if the applicant prepares a study which demonstrates to the satisfaction of the Ventura County Cultural Heritage Board that the farmworker residence has minimal historical, cultural or architectural significance.	Yes / applicant, Cultural Heritage Board, County Parks Department	None.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Impacts to Piru Cemetery Grading of the Piru Cemetery to provide fill material for the Levy component could impact the historic Cross above the Piru Cemetery.	HR-4 Remanufactured slopes shall not be permitted within 100 feet of the cross above the Piru Cemetery.	Yes, applicants, Public Works	None
Cumulative Historic Resource Impacts Over time, non-discretionary development can result in significant changes to neighborhoods. As noted previously, even designated County Landmarks can be altered or destroyed by non-discretionary development. Over time, loss of these historical resources and architecturally inappropriate development can diminish the historic fabric of a neighborhood. Such changes may have far-reaching psychological and societal impacts. A sense of historical place and "roots" within the Piru Community may be lost with the cumulative destruction of these resources.	HR-5 Require design review for all exterior alterations, new construction or demolitions within the Piru Community. This could be accomplished by rezoning all of Piru Residential Planned Development permit for residential development) or by revising the Piru CBD zoning District to encompass the entire community, or by creating a new design review overlay district for the balance of the Piru Community not already in the CBD district.	Unknown / feasibility to be determined by the Board of Supervisors.	Requiring design review of minor permits may result in delays, inconvenience and additional expenses to developers and property owners and expenditure of additional staff resources.
SCENIC RESOURCES Highway Views The proposed project may obscure views of mountains from Highway 126, and replace agricultural views with views of residential development (Applicable to the Levy Project Component and the Thompson property).	SR-1 (Applicable to the Levy Project Component) In order to mitigate the visual impacts of the project homes from Highway 126, the applicant will meet the following requirements: (a) Any residential units placed within 200' 100' of the northern edge of Highway 126 shall be single story, not to exceed 17' in height. (b) Landscaping shall be required adjacent to the northern edge of the highway in order to replace the visual and aesthetic resource of the orchards lost to development. The landscaping should not exceed 17' (so as to reduce any	Yes / Applicants, Planning Division	Cumulative development of the industrial properties along Highway 126 could obscure mountain views.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	obstruction of the mountain range) and could be in the form of a vegetative buffer of attractive bushes, shrubs, or trees (such as citrus trees). This landscaped area could be in association with noise-attenuating berms (if necessary) along Highway 126 that would act as both visual and acoustical barriers. Any sound-attenuating walls that are necessary shall be landscaped so as to prevent graffiti and screened from the public right-of way so that they appear as rural as possible (see Appendix 8.14; <i>Piru Community Smart Growth & Mixed Use Study</i>). Any proposed sound walls higher than six feet shall be terraced and shall be subject to review by the Piru Neighborhood Council. (c) A vegetative buffer of trees and/or shrubs (as described above) shall be installed along the eastern edge of the development to improve the view from the highway and compensate for the loss of agricultural views (i.e., citrus trees) lost to the development. (d) To mitigate the visual impacts of freestanding, off-site advertising signs (which are prohibited) located at the northeast corner of Main Street and Hwy 126, the applicant shall remove subject signs prior to issuance of a Zone Clearance for the project. SR-2 (Applicable to the Thompson property/County of Ventura Component) In order to mitigate the visual impacts associated with the loss of citrus trees (Thompson property) and their replacement with residential development, applicant will meet the following requirements: Any development of the Thompson property shall incorporate trees planted in a parkway along Pacific Avenue between any proposed homes and Highway 126. Trees should be spaced no more than 15' apart and should not exceed a height of 20' so as to minimize any obscuring of the mountain ranges. This would create aesthetic features that should offset the loss of visual resources of orange trees and several mature trees.		

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Main Street Views The project will result in loss of trees along Main Street (a County designated local scenic road), loss of agricultural views and will be visually impacted by an unsightly SC Gas Facility.	SR-3 All mature trees shall be surveyed by a qualified arborist prior to recordation of a tract map. Healthy, mature trees shall be incorporated into the project design. However, the Planning Director may authorize destruction or relocation of a healthy mature tree if the removal will result in a superior project design and if most of the remaining healthy trees are either retained or relocated on site. <u>Removed trees will be offset or replaced in a manner consistent with the Non-Coastal Zoning Ordinance.</u> SR-4 Applicants shall prepare a landscape plan subject to the approval of the Planning Director for the parkways along Main Street. These parkways shall incorporate trees designed to create a canopy over time to shade the pedestrian pathway and soften views of the planned residential development. SR-5 (Applicable to the Levy project) A landscape plan shall be prepared by the applicant, subject to the approval of the Planning Director, to completely screen the gas regulating station, including fences/walls, from motorists' views from Main Street and the surrounding residential properties. The landscaping shall be permanently maintained by a homeowners association. In the event that the gas regulating station is moved to a location that is not within the residential tract and is not visible from Main Street or Hwy 126, a landscaping plan is not required.	Yes / applicants, Planning Division, Southern California Gas Company	None
FLOODING, EROSION AND DRAINAGE FACILITIES			
On-Site Flooding The Rieder and Levy components are currently located within the 100-year flood zone	FC-1 Prior to recordation of tract maps, the Levy and Rieder developers shall apply to the Federal Emergency Management Agency (FEMA) and obtain for a Conditional a Letter of Map Revision (LOMR). Prior to issuance of a Certificate of Occupancy for the first residential unit on either the Levy and/or Rieder projects, the developers shall obtain a Letter of Map Revision (LOMR) from FEMA.	Yes / Applicants, FEMA	None
Detention Basins Off-site flooding can occur if stormwater detention basins are inadequately sized. Additionally, stormwater detention	FC-2 To reduce impacts associated with proposed detention basins, the following shall be required: (a) Prior to recordation of the final tract map, adequate onsite detention shall be demonstrated to the satisfaction of the WPD and PWA. The required detention basin(s) must be completed according to WPD's standards and must be ready for	Yes / Applicants, WPD, PWA	None

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basins intended to be used for recreation purposes can result in significant public health and safety hazards due to exposure of people to urban runoff contaminants.	operation before granting occupancy permits. (b) In order to prevent human contact with the standing water, public signs shall be posted warning of potential health risk during times when the basin has standing water. (c) In order to prevent standing-water situations that increase the potential for mosquito breeding, all detention basins shall drain completely within 48 hours of a Q100 storm event. (d) All detention basins shall incorporate Best Management Practices (per NPDES standards) for storm water quality purposes to reduce or eliminate contaminants and trash from entering into the public storm drain system, including the Main Street drainage (if applicable). (e) Water detention basins shall be maintained in the following manner: • Inlet and outlet devices shall be routinely cleaned. • <u>The basins shall remain clear of debris and trash</u> • Sediments shall be periodically removed. • All landscaping shall be maintained. Any erosion shall be re-vegetated. • All detention basins shall be maintained by a Home Owner's Association or by an Assessment District that is created by the developers for that purpose. In order to ensure proper maintenance of the basin, public signs will be posted in which the telephone number(s) of the HOA and the proper county agency will be listed. This will enable the public to make requests or complaints regarding maintenance issues. (f) If the basin is designed for both water detention and recreation, the following additional measures shall be complied with: • If children's play equipment is to be included in placed near these basins, then it shall be placed above the maximum water line to ensure children's safety and outside the depression area of the basin. If any fence/barrier and gate are required due to the basin's design (see below), then play equipment must be placed outside of such		

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	fencing/gating. The maximum water line should be based on the amount of stormwater detained that is the difference between Q10 and Q100 storm events (with a pre-development Q10 peak storm release rate). - To prevent excessive bacteria-causing animal feces, vending machines with plastic baggies shall be made available and public signs posted encouraging people to clean up after their pets. - To address potential public safety impacts, any detention basin that will contain water at a depth of 18 inches or more must be separated from the public by a five foot high, fence/barrier (climbing resistant—see below for further explanation) and a gate that shall be closed during the presence of standing water. the Detention basins that will contain standing water at a depth of less than 18 inches shall be designed to be no steeper than 10:1 on at least one side and shall have all other slopes no steeper than 5:1 if there is no perimeter fence/barrier and—bush/shrub landscaping exists; for any slopes greater than 5:1, a perimeter fence/barrier (climbing resistant—see below) shall be installed to prevent public access through such slopes. and shall be landscaped by bushes and shrubs in order to discourage people from coming inside the fence and/or walking along the edge the basin. (g) Any single-purpose (non-recreational) or dual-purpose (recreational) detention basin that contains water at a depth of 18 inches or more shall be surrounded by a fence/barrier consistent with the outdoor swimming pool standards of the Ventura County Building Code and County Zoning Ordinance.		
Off-Site Drainage Facilities Project stormwater runoff can adversely impact existing storm drains in Main Street and increase erosion of earthen drainage ditches downstream of the project.	FC-3 Prior to recordation of the final tract map for the Rieder Component, the developer's engineer shall demonstrate to the satisfaction of the PWA that the flow discharge from the proposed development does not adversely affect the existing 21" RCP and 30" RCP storm drain facilities (which have limited capacity) in Main Street per the County Road Standards for a Q10 event and does not adversely affect the ability for Habitat Humanity project to drain to these storm drains as originally designed. In addition, it will have to be demonstrated that the undeveloped flow discharge from the proposed development does not adversely affect the	Yes / Applicants, WPD, PWA	None

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	existing drain's capacity to maintain sufficient dry lane requirements on Main Street per Count Road Standards for a Q10 event. FC-4 Prior to recordation of the final tract map for any project in the Piru Expansion Area, the developer's engineer shall prepare and submit a hydrologic report to PWA demonstrating that the unimproved earth-lined ditches/washes south of Highway 126 and north of the Santa Clara River have adequate capacity to accommodate the proposed development's flow rates and that the duration of flow will not adversely erode the ditches/washes or cause downstream flooding. If the ditches/washes have no additional capacity or increased erosion will result, the developer's engineer shall prepare a plan to improve the affected facilities from Highway 126 to the Santa Clara River in a manner acceptable to the Director of Public Works. <u>Unless otherwise agreed upon by County and the developers, the fair share cost of this mitigation shall be allocated based upon acreage within each project component that utilizes the same ditch/wash.</u>		
Cumulative Off-Site Drainage Stormwater run-off from cumulative development within the nearby commercial and industrial parcels could increase erosion of offsite earthen drainage facilities into the ditches on Torrey Road and Warring Canyon Wash. This could result in significant impacts to capacity and erosion of these facilities	FC-5 Measure FC-4 should be imposed on any discretionary development that may occur on the commercial/industrial properties located along Highway 126 or Pacific Avenue.	Yes / Planning Division, WPD, PWA	None
NOISE Temporary Construction Noise Project construction will result in temporary, intermittent noise impacts to nearby residences.	N-1 Construction shall be limited to 7 <u>8</u> a.m. to 7 <u>6</u> p.m. Monday through Friday, and from 9 a.m. to 7 p.m. Saturday, Sunday and holidays. N-2 To be certain that noise from construction equipment and operation are minimized to the extent feasible, all construction contractors shall adhere to all applicable equipment and operations noise reduction measures	Yes / Applicants, <u>Planning Division</u>	Intermittent construction noise may be significant, depending on the location of construction equipment in relationship to the nearest residences.

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	contained in Appendix D of the County's adopted Construction Noise Thresholds and Control Measures (see Appendix 8.6). A copy of this Appendix D shall be provided to all construction contractors. N-3 Prior to initiation of grading, all adjacent homes will be provided with appropriate phone numbers in the event of noise complaints. These numbers shall include the site superintendent/supervisor as well as the Planning Division condition compliance personnel. If a construction related noise complaint is received, and determined to be valid by the County Planning Division, the County Planning Division shall employ (at the applicant's expense) an acoustical professional to determine if County noise standards have been exceeded. In the event the requirements identified in Measure N-2 are not adequate in reducing construction noise impacts at existing residences, the contractor shall also implement construction noise propagation path reduction measures and/or sensitive receptor construction noise reduction measures, as described in Appendix D of the County's adopted Construction Noise Thresholds and Control Measures (see Appendix 8.6).		
Traffic Noise Impacts Traffic noise from Main Street and Highway 126 could exceed the County's noise standard for homes closest to these facilities.	<u>N-4 To reduce traffic noise impacts, the following shall be required:</u> (a) Residential development shall be setback a minimum of 250 feet from the right-of-way of SR-126; (b) A six-foot high landscaped berm shall be provided on the Levy property along SR-126 and along the eastern property line for a distance of 750 feet north of Highway 126; and (c) Proposed housing shall be designed to face outward towards the highway with no large openings other than minimum required side setback requirements, so that the houses themselves act as a sound attenuating barrier, providing rear yards which comply with the County outdoor noise standard. Likewise development along Pacific Avenue and Main Street shall be designed to face outwards in the same manner to avoid the need for oversized subdivision walls. Items (a), (b) and/or (c) may be waived or the dimensional	Yes / Applicants, Planning Division	Residential development of the proposed Levy project could be reduced by 16 to 22 percent (17 - 23 dwelling units if a 250 foot setback is required and if the residential product remains unchanged. Likewise, the Finch property may be reduced by up to 5 dwelling units.

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	requirements provided herein may be altered with the approval of the Planning Director, if a qualified acoustical consultant provides a report that demonstrates the proposed subdivision will comply with the County's outdoor noise standard. However, any proposal that involves sound attenuating walls of any height, or berms (or wall/berm combinations) in excess of six feet in height shall be reviewed by the Piru Neighborhood Council. N-5 The following is applicable to homes located within 100 Feet of the centerline of Main Street (60 to 65 dB(A) CNEL): (a) All windows with an unobstructed view of Main Street shall have a minimum STC (sound transmission class) rating of 24. (b) Outdoor private recreation areas for multi-family housing (e.g., Rider component) shall be located to the rear of residential buildings, so that the building would act as a sound attenuating barrier, providing rear recreation areas which comply with the County outdoor noise standard. N-6 The following is applicable to all homes located between 375 and 750 feet of SR-126 (60 to 65 dB(A) CNEL): All windows with an unobstructed view of SR-126 shall have a minimum STC (sound transmission class) rating of 24. N-7 The following is applicable to homes located within 300 feet of SR-126 (over 65 dB(A) CNEL): (a) All windows with an unobstructed view of SR-126 (including homes that may be located along Pacific Avenue) shall have a minimum STC rating of 24 (first floor) and 29 (second floor) and sliding glass windows with exposure to SR-126 shall have a minimum STC rating of 30. (b) Windows shall be mounted in low air-infiltration frames (0.5 cfm/ft. or less per ANSI specifications) (c) Exterior doors facing SR-126 shall be solid core with perimeter weather-stripping and threshold seals. (d) Air conditioning or mechanical ventilation is required to allow residents to keep doors and windows closed, and thus provide the required sound insulation. (e) Second floor balconies with a view of SR-126 are		

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	prohibited. (f) Roof or attic vents shall be located on the side opposite SR-126 or baffled so that sound must take an indirect route when entering the attic space. Proposed vent treatments shall be approved by a qualified acoustical consultant prior to construction. N-8 Prior to recordation of any tract map in the Piru Expansion Area, applicants shall provide a report from a qualified acoustical engineer demonstrating that the proposed subdivision will comply with the County noise standards.		
Water Pump Noise Noise from existing water pumps could exceed the County Noise standard for proposed homes.	N-9 Any houses located between 100 and 200 feet of an existing water pump shall be subject to the requirements described in measure N-6 above. Any houses located within 100 feet of an existing water pump shall be subject to the requirements described in measure N-7 above. Alternatively, control of excessive pump noise could be accomplished by erecting an impervious barrier around the side(s) of the pump and motor that would block line-of-sight noise transmission to noise-sensitive receptors. This would not need to include more than three sides of the pump, so that ventilation would not be impeded. These measures will not be required if a qualified acoustical consultant can demonstrate the pump will not result in an exceedance of the County's noise standard.	Yes / Applicants, Planning Division	None
Community Park Noise If the proposed park includes a skateboard section, noise impacts could occur to nearby residences.	N-10 If the proposed park is planned to have a skateboard section, the location and design should be carefully planned to minimize noise impacts on nearby residents. The skateboarding area shall be constructed of smooth concrete on stiff structures to reduce the rolling noise levels and the noise of skateboard jumps, grinds and falls.	Yes / County Parks Department	None
Industrial Noise Homes within 52 feet of the FPCA packing plant may exceed the County noise standards for the proposed adjacent residents.	N-11 An 8 foot high sound wall shall be constructed between the FPCA packing plant and the Finch Property. Where visible from public roads the wall shall be landscaped or otherwise designed to discourage graffiti. This requirement may be waived if no residential properties are planned within 52 feet of the FPCA packing plant.	Yes / applicants, Planning Division.	Operation of the plant 24 hours a day may cause some annoyance to residents located in close proximity to the packing plant due to plant operations, truck activity

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			and nighttime lighting.
TRANSPORTATION AND CIRCULATION			
Level of Service Impacts on Public Roads Project-generated traffic added to year 2020 cumulative buildout traffic will cause the intersections of SR-126 at Pacific Avenue (east) and SR-126 at Center Street to operate at an unacceptable LOS.	T-1 To improve intersection conditions at SR-126 at Pacific Avenue (east), the following traffic mitigation measures shall be implemented: <u>Install raised median, channelizers, and extension striping shall be installed to prevent left-turns from Pacific Avenue (east). This mitigation shall not be implemented until roads in Component C have been constructed and provide an alternate route for residents living on Pacific Avenue to access Main Street and the intersection improvements at Main Street and Highway 126 (Measures T-3 and CC-2) have been completed.</u> T-2 To improve conditions at the intersection of SR-126 at Center Street, the following traffic mitigation measures shall be implemented: <u>Install a raised channelizers island and extension striping on Center Street at SR-126, shall be installed to preventing left-turns from Center Street to eastbound SR-126. This measure shall also include installation of additional signage directing eastbound traffic to use Main Street. This measure shall not be implemented until the intersection improvements at Main Street and Highway 126 (Measures T-3 and CC-2) have been completed.</u>	Yes / Applicants, PWA	None
Traffic and Pedestrian Safety Project and cumulative development will exacerbate existing traffic and pedestrian safety issues identified within the Piru Community	T-3 Traffic and Pedestrian Safety at the intersection of Main Street at SR-126 (In addition to the improvements already planned and budgeted by Public Works and Caltrans): • Improve signal phasing, provide longer mast arms and new left-turn signal heads, provide new signal timing software; • Lengthen left-turn storage capacity on eastbound SR-126 (minimum of 260 feet); • Provide a dedicated <u>Lengthen</u> left-turn lane storage capacity on southbound Main Street (minimum of 200 feet) <u>and provide new left-turn signal phasing and new left-turn mast head</u>; • Provide a westbound right-turn deceleration lane from westbound SR-126 at Main Street; and • Provide pedestrian signal heads, American Disabilities Act	Yes / Applicants, PWA	None

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	compliant <u>safe refuge areas</u> at the corners, <u>zebra-striped crosswalks</u>, pushbuttons and new signal timing software at the intersection of SR-126 at Main Street. T-4 Traffic and Pedestrian Safety on Main Street (<u>project applicants only</u>, part of <u>Enhanced Main Street Concept</u>): • Provide Zebra-stripe crosswalks at new Main Street intersections within the Piru Expansion Area; T-5 Traffic Safety at the Intersection of Main Street at Via Fustero: • Provide a traffic calming entry island on Main Street, south of Via Fustero; • Provide Zebra-stripe crosswalks across Via Fustero; and • Replace the existing wooden barrier south of Via Fustero with standard curbing to provide protection for a building column that encroaches upon the existing roadway. T-6 Traffic Safety on Piru Canyon Road: • Provide an advanced speed warning sign (25 MPH ZONE AHEAD) for southbound Piru Canyon Road as it approaches the developed area of Piru. T-7 Traffic Safety at the Intersection of Main Street at Center Street: • Provide traffic-calming curb extensions with zebra-striped crosswalks. T-8 Traffic Safety at the Intersection of Center Street at SR-126: • Provide a westbound right-turn deceleration lane from SR-126 to Center Street. T-9 Traffic Safety at the Intersection of Center Street at Orchard Street: • Provide traffic-calming curb extensions with bold crosswalk markings, a new street lamp and pedestrian crossing signs. T-10 Traffic Safety on Center Street between Piru Creek Bridge and SR-126:		

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Piru Traffic Impact Mitigation Fee (TIMF) Augmentation In order to ensure that the level of service and traffic and pedestrian safety improvements recommended for the Piru Community are fully funded, a TIMF augmentation is recommended.	• Conduct engineering and traffic survey for Center Street, between Piru Creek Bridge and SR-126, and install new 35 mph speed limit signs, if warranted. T-11 Prior to recordation of any tract map within the Piru Expansion Area, the Public Works Agency shall prepare an amendment to the County's Traffic Impact Mitigation Fee Ordinance for the Piru Area of Interest (or prepare a separate ordinance) that would collect fees for the improvements listed in the above measures (T-1 to T3 and T-5 to T-10). Public Work's staff costs for processing this ordinance/amendment shall be fully funded by the applicants.	Yes / Applicants, PWA	None
Internal Project Circulation The proposed tract maps for the Rieder and Levy components could result in parking and circulation impacts.	T-12 (applicable to Rieder Component) Curbside parking shall be prohibited on internal streets in order to allow adequate space for vehicles to pass each other and emergency vehicle access. T-13 (Applicable to Levy Component) Curbside parking shall be prohibited on internal streets "A", "C", "D" and "G" shall be redesigned to comply with the applicable County Road Standards for the Piru Community or the Fire Protection District's Private Road Guidelines, as applicable. -Additional guest parking of at least one space for each two units shall be provided within the subdivision.	Yes / Applicants, Planning Division	None
Piru School Safety and Circulation The proposed projects and cumulative development will exacerbate existing safety and circulation issues relating to student drop-off at Piru School.	T-14 In order to ensure a safe pathway from the proposed development to Piru School, the following measure is recommended: new curb, gutter and a bicycle/pedestrian pathway shall be installed continuously from the Piru Expansion Area to connect with existing improvements north of the railroad tracks. Such improvements shall be bonded for prior to issuance of a zoning clearance for residential construction, and improvements shall be completed prior to issuance of occupancy permits for residential development. With respect to properties not under the control of any of the applicants, the applicants shall make a written offer to construct the above improvements. If the offer is rejected, and the County is not willing to use its power of eminent domain, applicants will have no other obligation regarding this measure. Unless otherwise agreed upon by County and the		None

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	developers, the cost of this mitigation shall be allocated based upon the estimated number of elementary students generated by each project component. T-15 In order to improve vehicular circulation and student drop-off at Piru School, the following measure is recommended: prior to recordation of any tract map in the Piru Expansion Area, applicants shall pay a fee to the Fillmore Unified School District to cover the applicant's share of the cost to construct student drop-off and parking improvements at Piru School.		
Bus Transit Project and cumulative development will increase the need for public transit.	T-16 Provide an additional bus turnout/shelter at Via Fustero, opposite Piru Town Square and the train station.	Yes / Applicants, PWA, APCD, VCTC	None
Cumulative Regional Traffic Impacts In addition to the TIMF augmentation required by Measure T-11 for improvements within the Piru Community, Measure T-17 will address cumulative traffic impacts to the County's Regional Road Network.	T-17 To address cumulative impacts of traffic on the Regional Road Network, Ventura County Traffic Impact Mitigation Fee Ordinance 4246 and General Plan Policy 4.22 require that the Transportation Department of the Public Works Agency collect the Traffic Impact Mitigation Fee (TIMF) for the Piru District.	Yes / Applicants, PWA	None
GROUNDWATER AND WATER SUPPLY QUANTITY			
Oxnard Plain Aquifer The combined project will result in a net loss of 172 AF of groundwater in the Piru basin, which is in hydrological continuity with downstream aquifers and will thus indirectly reduce groundwater within the overdrafted Oxnard Plain Groundwater Basin.	GQ-1 Prior to tract map recordation, the developers shall prepare a Groundwater Mitigation Plan subject to the review and approval of the Watershed Protection District (WPD), which shall incorporate one or more of the following mitigation options to ensure that there will be no net loss of groundwater to the Oxnard Plain Groundwater Basin as a result of the proposed projects: (a) Piru Wastewater Treatment Plant Recycling of treated wastewater (b) Reduced Groundwater Usage through Conservation (c) Water-Capture, Storage, and Recharge (d) New or Imported Water Supplies	Yes / Applicants, WPD, PWA	None

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Cumulative Groundwater Loss Cumulative development in the Piru area is estimated to result in a net loss of 280 2.664.2 AF/year of groundwater (which includes project water loss). Additionally, Santa Paula areas is expected to result in a cumulative loss of 3,349 1.236 AF/year of groundwater.	The combination of recharging the groundwater with the project's treated sewage water and utilizing appropriate conservation methods could potentially reduce groundwater impacts to a less-than-significant level. The developers' water studies would have to demonstrate such savings, and would have to be reviewed and approved by WPD. GQ-2 Discretionary development shall be conditioned to require one or more of the mitigation options described in measure GQ-1.	Yes (for projects within the unincorporated area), Unknown for projects within City of Fillmore and City of Santa Paula. / Planning Division, WPD, PWA	None
SEWAGE TREATMENT Treatment Plant Capacity Prior to completion of a planned treatment plant expansion, there is insufficient capacity at the existing Piru Wastewater Treatment Plant to accommodate the proposed development.	ST-1 Tract maps within the Piru Expansion Area shall not be permitted to record until the PWWTP expansion has been under construction for at least six months. Zoning Clearances for occupancy of residential developments shall not be issued until the PWWTP expansion is completed.	Yes / Public Works Agency, Planning Division	None.
UTILITIES – GAS SAFETY AND TELEPHONE SERVICE Gas Safety The Gas Company metering facility has a remote possibility of rupturing or leaking.	GS-1 To reduce the risk to residents from a flash fire from a rupture or leak of the 250 psig pipe and valve, one of the of the following measures shall be employed prior to recordation of the Component B Tract Map: • Add a leak detection and automatic shutdown system to the Gas Company facility, or • Move the Gas Company facility to another site south of Highway 126.	Yes / Applicants, SC Gas Company	If the gas facility remains at the existing site, there is a potential for minor odors.

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LAW ENFORCEMENT AND EMERGENCY SERVICES			
Law Enforcement Population generated by the proposed projects and cumulative development will require the need for additional patrol officers.	LE/ES-1 The Sheriff's Department shall reinstate the Community Resource Officer within the Piru Community. Prior to recordation of any tract map in the Piru Expansion Area a County Service Area (CSA) or Community Services District (CSD) shall be formed to provide additional tax support for one Piru Community Sheriff's Office developers shall coordinate with the Piru Neighborhood Council, the Local Agency Formation Commission (LAFCO) and the Sheriff's Department to determine the most appropriate long-term mechanism to fund a Community Resource Sheriff's Officer for the Piru Community. If the Piru Community desires formation of a communitywide special district (e.g., a County Service Area or Community Services District) developers shall pay the cost of formation of such a District. Alternatively, developers may elect to form a Community Facilities District (CFD), with authorization by the Board of Supervisors. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with the creation of a special district with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps.	Feasibility of formation of a CSA/CSD or CFD is unknown. Feasibility of a CSA or CSD will depend upon approval by LAFCO based upon its determination of financial feasibility and compliance with LAFCO policies and existing Piru resident's willingness to support an added tax burden for increased law enforcement services and the willingness of the Board of Supervisors to commit funds for this purpose. Formation of a CFD will require approval by the Board of Supervisors, which has historically opposed the use of CFDs if other mechanisms are available and there is no overriding public benefit. Board of Supervisors, Sheriff, LAFCO, Planning Division	None, if a CSA/CSD or CFD is formed. If a CSA/CSD or CFD is not formed, law enforcement services within the community will remain the standard service offered by the Sheriff's Department.
Emergency Services - Emergency Shelter Population generated by the proposed project may exceed the capacity of Piru School as an emergency shelter during storm events and dam failure emergency conditions. Evacuation of the community by automobile during a catastrophic dam failure emergency may not be possible and residents of the Thompson property with limited	LE/ES-2 Prior to recordation of any tract map in the Piru Expansion Area, developers shall fund construction of a storage facility at Piru School along with tents, cots, blankets and 3-day emergency food and water supply for 200 evacuees. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. LE/ES-3 Prior to recordation of any tract map for the Thompson property, an emergency evacuation plan for residents of this area shall be developed. This plan may include construction of a shorter pathway to Piru School	Yes, Applicants, FUSD, Red Cross	Less than significant, because a catastrophic dam failure is considered extremely remote. However, it is noted that under a catastrophic dam failure condition, Piru School would not be adequate to provide emergency shelter for the entire Piru Community and would not be able to accommodate automobile parking for the

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
mobility may not be able to safely evacuate by foot within the maximum 18-minute dam failure warning.	(e.g. along the Warring Wash right-of-way), construction of an emergency access road connecting the Thompson development to West Center Street, or other means acceptable to the County that would improve the residents safety in the event of a catastrophic dam failure emergency.		entire community.
Emergency Services – Dam Failure Warning Some residents in the Piru Expansion Area may not be able to hear the existing warning siren.	LE/ES-4 Prior to recordation of tract maps in the Piru Expansion Area, developers shall provide funds to the United Water Conservation District to install an additional emergency warning siren. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component.	Yes / Applicants, UWCD	None
EDUCATION			
Elementary School Capacity Project and cumulative development could exceed the capacity of Piru Elementary school.	FUSD is expected to consider an array of options to accommodate house project and cumulative-generated elementary students. Among the options available are: reconsideration of out-of-district and out-of-attendance area transfer policy, re-drawing the Piru School attendance boundary, and transferring Sespe farmworker housing project students to schools in Fillmore, in addition to expansion of facilities on the Piru School campus. The County has no authority over the School District's decision regarding this matter. Compounding the issue is the lack of adequate funding for any needed school improvements and the ad hoc manner in which the Piru School campus has been expanded in the past, resulting in poor utilization of space and educational inefficiencies. The following measure is recommended to address elementary school capacity impacts: E-1 Prior to recordation of any tract map within the Piru Expansion Area, the effective date of project approval shall be deferred until November 2006, or until the following occurs: the applicants shall enter into an agreement to provide sufficient funds to Fillmore Unified School District (FUSD) to develop a Piru School master plan, that would address how the FUSD would provide educational services based on the number of dwelling units approved by the County, along with an estimate of construction and land acquisition costs, and if the cost of such improvements is	Yes (unless SB 50 is extended) / Applicants, FUSD.	If expansion of the Piru School site is deemed necessary by the School District, such expansion would likely result in significant agricultural impacts.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Library Service Development of the proposed projects will cause the library size to population ratio to drop below an acceptable level and increased population will exacerbate library services which are already operating at an insufficient number of hours per week.	determined to be in excess of required FUSD development fees the applicants shall enter into an agreement with the School District to form a Mello-Roos Community Facilities District (CFD) or other mechanism acceptable to FUSD to finance construction of needed school improvements in Piru, if the cost is determined to be in excess of required FUSD development fees Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the estimated number of elementary students generated by each project component. In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with preparation of the Piru School Master Plan and shall agree to pay all costs associated with the creation of a CFD with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps. Upon application for a permit adjustment, this measure may be modified by the County in the event the FUSD fails to complete the required Piru School master plan within a timely matter (within 120 days of submission of required funds) or if the developer believes the cost of improvements are not justified. E-2 Prior to recordation of any tract map within the proposed Piru Expansion Area, the developer shall deposit a fee of \$216 per dwelling unit to cover the cost of library expansion. E-3 Prior to recordation of any tract map in the Piru Expansion Area a County Service Area (CSA) or Community Services District (CSD) shall be formed to provide additional tax support for the Piru Library to cover developers shall coordinate with the Piru Neighborhood Council, the Local Agency Formation Commission (LAFCO) and the Ventura County Library to determine the most appropriate mechanism to fund the cost of increasing library hours of operation to 40 hours per week and to fund maintenance of the book collection. If the Piru Community desires formation of a communitywide special district (e.g., a County Service Area or Community Services District) developers shall pay the cost of formation of such a district. Alternatively, the developers may elect to form a Community Facilities District (CFD) with authorization from the Board of Supervisors.	Yes, for Measure E-2. For Measure E-3, feasibility of formation of a CSA or CSD or CFD is unknown. Feasibility of a CSA or CSD will depend upon approval by LAFCO based upon its determination of financial feasibility and compliance with LAFCO policies and existing Piru resident's willingness to support an added tax burden for enhanced library services. Formation of a CFD will require approval by the Board of Supervisors, which has historically opposed the use of CFDs if other	None, if a CSA/CSD or CFD is formed. If a CSA/CSD or CFD is not formed the community library hours of operation will remain unchanged.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with creation of a district with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps.	mechanisms are available and there is no overriding public benefit. Applicants, Board of Supervisors, Ventura County Library, LAFCO, Planning Division	
RECREATION			
Parkland Deficiency The proposed project will generate a need for 7.2 acres of additional usable public parkland.	R-1 Prior to recordation of any tract maps within the Piru Expansion Area, applicants shall identify one or more park sites acceptable to the County Parks Department and the Piru Park and Recreation Commission of at least 7.2 acres and must guarantee, to the County's satisfaction, full funding for site acquisition, planning, grading, construction of park facilities, landscaping, and long-term operation and maintenance of the park(s). The park(s) must be completed prior to issuance of a Zoning Clearance for construction of the 200th dwelling unit within the Piru Expansion Area. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component.	Yes / applicants, Parks Department, Piru Park and Recreation Commission, Planning Division	Residual impacts may occur with respect to development of the proposed park, depending upon which park site alternative is selected. For example significant loss of agricultural resources would occur if the new park is located in an agricultural area outside the Piru Expansion Area. Significant growth inducement impacts could occur if the park site selected is located outside the Piru Community. Potentially significant biological resource and flood hazard impacts could occur with respect to the Camulos Orchard park site alternative.
Cumulative Parkland Deficiency Park fees have not been adjusted since the 1970's and are inadequate to fund park acquisition, development and operational costs	R-2 The Parks Department shall be directed to revise and update the County Quimby Ordinance to ensure that local park developer fees are adequate to ensure development of local parkland to County standards. Additionally, the Parks Department should be directed to develop a funding mechanism to ensure adequate long-term maintenance and operation of existing and future local parks, including Piru Town Square.	Yes / Parks Department, LAFCO (if a CSA/CSD is required)	None

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Inconsistency with Piru Area Plan Policy 4.7.2-2 requires planned Residential Development Permits to provide private recreation space within the development.	R-3 Each applicant for a residential planned development within the Piru Expansion Area shall be required to provide on-site private recreation facilities for residents. A plan for private recreation facilities shall be approved by the Planning Division prior to recordation of any tract map in the Piru Expansion Area. The plan should include facilities for toddlers, youths and adults. These may include a tot lot, skate park, basketball court, volleyball courts, jogging/exercise facilities and/or picnic tables and barbeque areas.	Yes / applicant, Planning Division	None
Regional Trail Deficiency The proposed development would generate a need for 3.6 miles of additional regional trails.	R-4 Prior to recordation of any tract map within the Piru Expansion Area, applicant's shall fund a detailed landscaping and design plan for a bicycle and pedestrian pathway plan that will provide at least 3.6 miles of Class 1 bicycle and pedestrian pathway including both sides of Main Street between Highway 126 and the railroad tracks, and other locations within the proposed development or within the community as may be approved by the Planning Director in consultation with the Piru Neighborhood Council. Funding for the construction and long-term maintenance of the pathway system shall be guaranteed prior to recordation of any tract map within the Piru Expansion Area. <u>In lieu of construction of off-site improvements, applicants may opt to enter into an agreement with the Los Padres National Forest or the United Water Conservation District to fund construction and/or long-term maintenance of public Class M hiking/equestrian trails within the Piru Area of Interest.</u>	Yes / applicant, Parks Department, Recreation Commission, Planning Division	None
COMMUNITY CHARACTER			
Loss of Rural Agricultural Entryway to the Piru Community The Piru Community is currently separated from Highway 126 by a 750 to 1,750 foot wide agricultural buffer. The proposed project would remove this buffer and connect the existing community to existing commercial and industrial development along the Highway 126 corridor. For some Piru residents, the loss of this rural agricultural entryway to the community would be perceived as a	CC-1 Develop properties adjacent to Main Street with large-lot, single-family (or duplexes designed to look like single family homes) residential development with a average 75 foot lot width, 10,000 square foot average lot size and a variable front setback, averaging 25 feet, with a minimum of 20 feet, unobstructed by walls or fences or hedges and minimum 10 foot side yard setback. CC-2 Prior to recordation of any tract map within the Piru Expansion Area, developers shall be required to fund preparation of a detailed enhanced Main Street plan entryway to the community featuring a landscaped median (first block only), and coordinated planting and maintenance of parkway landscaping, pedestrian and bicycle pathways	Yes / applicant, Planning Division, Public Works , Fire Department	No urban development within the Piru Expansion Area can avoid the loss of the existing rural agricultural entryway. Nonetheless, measures CC-1 and CC-2 can reduce the perceived impact. Whether the reduction would be less than significant would be up to the judgment of individual Piru residents. It is likely that some residents would

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
significant adverse impact on community character	and an enhanced pedestrian crossing with bulb-outs and pedestrian-activated signal at the intersection nearest the park. The enhanced Main Street Plan shall include a full funding commitment for construction and long-term maintenance of landscaped parkways and medians and shall be reviewed and approved by the Piru Neighborhood Council and approved by the Public Works Department, Fire Department and Planning Division prior to recordation of any tract map within the Piru Expansion Area. The landscape plan shall take into consideration truck and recreational vehicle usage on Main Street. Unless otherwise agreed upon by County and the developers, the fair share cost for this measure shall be allocated based upon the percentage of linear street frontage along Main Street.		continue to perceive the suggested project revision as a significant community character impact.
Community Character Impacts Associated with the Levy Project The small lot size combined with uniform two-story development, with minimal side yards and two-car garages dominating the front of the houses, lack of adequate guest parking and recreation areas would create the appearance of overcrowding and automobile domination, compared to existing neighborhoods within the Piru Community. Additionally, the very similar appearing residential units planned along Main Street would create a monotonous and overcrowded appearance along this vital entry corridor to the Piru Community.	CC-3 Architectural styles, building elevations, colors and materials shall be reviewed and approved by the Piru Neighborhood Council (PNC) and approved by the Planning Division, and shall be designed to be consistent with the proposed Piru Community Residential Design Guidelines. The PNC shall respond in writing to the Planning Division either recommending approving the design or providing a list of corrections necessary to achieve consistency with the Piru Residential Design Guidelines. Such response shall be provided within 45 days of PNC's receipt of an architectural package including building elevations, site plans, and a palette of colors. If substantial changes are made by the applicant in response to the PNC determination, the Planning Director may request additional review by the PNC. If the PNC fails to provide a written response within 45 days, the Planning Director is authorized to approve the architectural design, subject to the normal appeal process. CC-4 For houses fronting on both Main Street, the developer shall employ a minimum of three distinctly different floor-plate building footprints, with at least two distinctly different architectural styles reflective of existing community. CC-5 Landscaped parkways shall be provided along all residential streets and shall be planted with trees designed to form a shade canopy over the street at maturity. Tree trimming within the parkway shall be the responsibility of a Landscape Maintenance District, the homeowner's	Yes / applicant, Public Works Agency, Planning Division	Some Piru residents may perceive a significant community character impact with respect to the loss of the existing rural agricultural entryway to Piru and the development of relatively small interior lots within the Levy component.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
	association, or other means acceptable to the County. CC-6 Internal streets "A", "C", "D" and "G" shall be redesigned to comply with the County Road Standards that apply to Piru or the Fire Protection District's Private Road Guidelines. A deviation shall be obtained from the Public Works Department for any roads not consistent with the applicable County Road Standards. CC-7 Attached garages facing the public street shall not exceed 33% of the front width of any house. This does not apply to garages accessed by a rear alley or garages set back behind the house and accessed by a single-car wide driveway. CC-8 Minimum lot width of interior lots shall be based upon the following standards: Garage entry is from a rear alley: 45 feet Garage is setback behind the house and accessed by a single-car wide driveway: 50 feet Attached tandem garage is accessed by a single-car wide driveway: 50 feet		
Community Character Impacts in General	Two-car garage is accessed from the street: 65 foot CC-9 All residential development constructed adjacent to Main Street shall be designed to face Main Street. No residential walls or fences over three feet in height shall be constructed along Main Street. CC-10 Amend the proposed Piru Residential Guidelines to ensure that future development of the Finch and County of Ventura components would contain similar development as on the east side of Main Street, with respect to lot size and lot width, setback and building height requirements and to ensure that proposed access roads align with the developments planned east of Main Street. CC-11 Amend the Zoning Ordinance to permit tandem garages (at least in Piru) CC-11 Maintenance of private streets and alleys detention basins and private recreation areas shall be the responsibility of a homeowner's association or other means acceptable to the County. Such facilities shall be subject to	Yes, Planning Division, Board of Supervisors, Sheriff's Department, applicants	None.

Issue - Impact	Mitigation	Feasibility/Implemented By	Residual Impacts
Growth Inducement Potential to set a precedent for further conversion of agricultural lands is deemed less than significant due to SOAR Ordinance.	review by the Sheriff's Department to ensure defensible space issues are addressed. None required	N/A	None
General Plan Consistency Analysis The project is potentially inconsistent with the following General Plan policies: • Policy 1.9.2-2 (requires projects to promote energy conservation) • Policy 4.1.2-1 (requires development to contribute toward the cost of needed public improvements and services related to the proposed developments) The Project is potentially inconsistent with the following Piru Area Plan policies: • Policy 1.6.2 (requires preparation of an energy conservation plan) • Policy 3.1.2-3 (requires developers to submit phasing plans) • Policy 3.5.2-2 (requires residential designations to provide for an approximate 85% single-family/15% multi-family dwelling unit mix)	Potential inconsistency with General Plan Policy 1.9.2-2 and Piru Area Plan Policy 1.6.2 would be addressed by recommended mitigation measures (AQ-2 and AQ-3 see above). Potential inconsistency with General Plan Policy 4.1.2-1 would be addressed by recommended mitigation measures T-11, CC-2 and R-1 (see above). Potential inconsistency with Piru Area Plan Policy 3.1.2-3 and Policy 3.5.2-2 would be avoided if these policies are deleted as recommended (see Project Description chapter).	Yes / Board of Supervisors	None

ALTERNATIVES

Pursuant to CEQA Guidelines Section 15126.6, the following project alternatives were developed that are capable of avoiding or substantially reducing one or more significant effects of the project. To avoid significant, unmitigated impacts to air quality, agricultural soils, noise, and community character, the following alternatives were examined:

ALTERNATIVE	SIGNIFICANT IMPACTS AVOIDED	SIGNIFICANT EFFECTS OF ALTERNATIVE
NO PROJECT AND RIEDER ONLY PROJECT ALTERNATIVES		
No Project Alternative Assumes project area would remain designated as Agricultural and that no further subdivision would occur. This alternative would yield up to four additional single-family dwelling units.	No reduction in ambient air quality No loss of prime agricultural soils No loss of historic resources No loss of agricultural or mountain views from Highway 126 (an eligible scenic highway) No significant exterior noise impacts from Highway 126 No added traffic No increased demand for educational facilities No alteration of community character	Potential land use conflicts (noise, dust, odors, pesticide over-drift) associated with agricultural development adjacent to existing residential development No new park would be developed No library expansion would occur Enhanced Main Street would not occur Bicycle/pedestrian facilities would not be expanded Traffic safety improvements would not be funded This alternative would not meet any of the project objectives
Infill Development of John Rieder Site Only Assumes development of the John Rieder site as proposed but the remainder of the Piru Expansion Area would remain designated as Agricultural. This alternative would yield up to 60 additional multi-family dwelling units.	Less than significant impact on ozone precursors No Loss of five acres of prime agricultural soils (compared to the loss of up to 68.8 acres under the proposed project) No loss of agricultural or mountain views from Highway 126 No significant exterior noise impacts from Highway 126 Minor traffic increase Less than significant impact on elementary school capacity	Potential loss of historic Maltby residence and associated trees Community character impacts associated with four-plexes and with privacy walls/fences on Main Street with zero front yard setbacks. Growth would result in inconsistency with AQMP population forecast and General Plan and Area Plan policies requiring consistency with the AQMP Community parkland deficiency would be exacerbated Enhanced Main Street would not occur Bicycle/pedestrian facilities would not be expanded Traffic safety improvements would not be fully

ALTERNATIVE	SIGNIFICANT IMPACTS AVOIDED	SIGNIFICANT EFFECTS OF ALTERNATIVE
		funded This alternative would not be consistent with the project objective to provide a diversity of housing opportunities
ALTERNATIVE DESIGN CONCEPTS		
Lower Density Residential Development Design Alternative Assumes Rieder site would develop at R-1 density and that the balance of the Piru Expansion Area would develop at a density of 1.5 dwelling units per acre. This alternative would yield up to 110 single-family residential units.	Less than significant impact on ozone precursors No need to expand sewage treatment plant Traffic impacts would be substantially reduced compared to the proposed project Less than significant impact on elementary school capacity Community character impacts would be avoided	Loss of 57 up to 68.8 acres of Prime agricultural soils (same as proposed project) Growth would result in inconsistency with AQMP population forecast and General Plan and Area Plan policies requiring consistency with the AQMP Community parkland deficiency would be exacerbated Enhanced Main Street may not occur Bicycle/pedestrian facilities may not be expanded Traffic safety improvements may not be fully funded This alternative would not be consistent with the project objective to provide a diversity of housing opportunities Project may not be financially feasible to applicants
Park-Centered Design Alternative Assumes the same number of dwelling units as the proposed project but the dwelling units are organized so that the highest density housing is closest to the park while housing density is reduced as distance from the park increases.	None, but this alternative would have social benefits as residents of the highest density housing, which normally have the least amount of private recreation available, would have the best access to parkland while traditional single family detached housing which have private recreation space in their backyards would have to walk further to the park.	Same as proposed project.
Dispersed Density Design Alternative Assumes the same number of dwelling units as the proposed project but each block would be designed to accommodate a range of dwelling unit density and product type.	This alternative could have some visual benefits as it would avoid monolithic neighborhoods composed of the same residential product type. Additionally, this alternative would have some social benefits as it would meet the needs of a variety of lifestyles and family incomes.	Same as proposed project, but this alternative could have community character impacts if poorly executed.
Mitigated Community Design Alternative Assumes approximately the same amount of	Impacts associated with ozone precursors would be reduced, compared to the proposed project.	Loss of 57 up to 68.8 acres of prime agricultural soils (same as applicant-proposed project)

ALTERNATIVE	SIGNIFICANT IMPACTS AVOIDED	SIGNIFICANT EFFECTS OF ALTERNATIVE
development as proposed by the applicants but reorganized to illustrate mitigation measures proposed in various EIR chapters, provide a more cohesive plan for the Piru Expansion Area, provide visual interest, incorporate form-based new urbanism concepts and reflect input by the Piru Area Plan Update Committee. <u>This alternative would provide for a range of housing types including estate lots, single family traditional units, duplex units and multi-family housing units and two public parks near Highway 126.</u> This alternative would yield up to 367 394 dwelling units (7% reduction compared to the same—as applicant proposed project).	Impacts on historic resources would be reduced, compared to the proposed project Exterior noise impacts from Highway 126 would be reduced compared to the proposed project Traffic impacts would be reduced compared to the proposed project Community character impacts would be substantially reduced compared to the proposed project.	Traffic and air quality impacts would remain significant (although somewhat less than applicant-proposed project) Impacts on Piru School would remain significant (same as applicant-proposed project)
<u>Piru Charrette Vision Design Alternative</u> <u>This alternative would provide a variety of housing types including equestrian estate lots, traditional single-family on several different size lots, duplexes and multi-family cottage court units. The alternative also includes three public parks, public multi-use trails, community garden plots, and a commercial/residential mixed use site. This alternative would yield 331 dwelling units (18.5% reduction compared to the applicant proposed project).</u>	<u>Agricultural impacts would be marginally less than the proposed project.</u> <u>Impacts associated with ozone precursors would be reduced, compared to the proposed project due to a reduction in the number of dwelling units and a pedestrian-friendly design</u> <u>Exterior noise impacts from Highway 126 would be reduced compared to the proposed project due to increased setback and sound wall.</u> <u>Traffic impacts would be reduced compared to the proposed project due to a pedestrian-friendly design and a reduction in the number of dwelling units.</u> <u>Impacts with respect to elementary school overcrowding would be reduced compared to the proposed project due to a reduction in dwelling units.</u> <u>Community character impacts would be substantially reduced compared to the proposed project.</u> <u>Multi-use trail system may encourage pedestrian/bicycle travel over automobile travel compared to conventional development.</u>	<u>Loss of up to 66.4 acres of Prime agricultural soils (same as proposed project except for orchard plantings and community garden plots)</u> <u>Alternative would generate about 18.5% less ozone precursors than the proposed project; however, the project would still exceed AQMP significance thresholds for ROG and NO_x.</u> <u>Potential visual impacts associated with sound wall depending upon design and location.</u> <u>Alternative would generate about 18.5% less traffic than the proposed project; however, project and cumulative traffic would contribute to significant level of service impacts at the intersections of Highway 126 at Center Street and at Pacific Avenue.</u> <u>Access road connection to Pacific Avenue would be dependent upon development of the Thompson property, which may not occur for some time.</u> <u>Alternative would generate about 18.5% fewer students than the proposed project. However, elementary students would still exceed capacity of Piru School.</u> <u>Equestrian lots may result in noise, dust, odor, vector control, water quality impacts and safety impacts.</u>

ALTERNATIVE	SIGNIFICANT IMPACTS AVOIDED	SIGNIFICANT EFFECTS OF ALTERNATIVE
James Finch Design Alternative This alternative design only applies to the Finch property. It includes a mix of dwelling unit types including estate housing, traditional single family housing, duplexes and multi-family condominium units at 17 dwelling units per acre. The concept includes a sports park adjacent to the FPCA packing plant, multi-use trails and a commercial/residential mixed use site. This alternative would yield the same number of dwelling units as the proposed project.	This alternative could have some visual benefits as it would avoid monotonous neighborhoods composed of the same residential product type. Additionally, this alternative would have some social benefits as it would meet the needs of a variety of lifestyles and family incomes. Noise impacts would be avoided by construction of a stepped sound wall. Multi-use trail system may encourage pedestrian/bicycle travel over automobile travel compared to conventional development.	Impacts would be the same as for the proposed project except for the following: Multi-family condominiums would be out of character due to bulk/form and density. Some residential units do not reflect architectural heritage of Piru community. Estate lot housing utilizes front loaded 3-car garages which would be perceived as automobile dominated, compared to traditional development in Piru. Alternative does not provide a full access road connection to Pacific Avenue as required by Public Works.
ALTERNATIVE LOCATIONS		
Higher Density Infill Development Within the Piru Community This alternative assumes that the proposed dwelling units would be dispersed within the 37 acres of existing undeveloped residentially zoned land within the Piru Community.	Avoids loss of prime farmland. Preserves rural entryway to Piru along South Main Street	In order to accommodate 394 dwelling units the undeveloped parcels would need to be rezoned to much higher density which could result in significant community character impacts
Development Along Center Street Adjacent to the Piru Community This alternative assumes that the proposed dwelling units would be located along Center Street west of the existing Piru Community and/or along Center Street east of the Piru Community.	Preserves rural entryway to Piru along South Main Street Avoids agriculture/school land use conflicts and would facilitate expansion of the school property. Could facilitate development of a combined school/park	Significant loss of prime farmland Conflicts with Greenbelt Agreement and SOAR Ordinance
Rancho Temescal This alternative assumes that at least a portion of the proposed dwelling units would be located on ten acre parcels in Piru Canyon	Avoidance of potential historical resource impacts associated with the loss of the Maltby residence and farmworker housing Scenic resource impacts would be reduced compared to the proposed project Avoidance of noise impacts associated with Highway 126 traffic No need to expand sewage treatment plant	Significant growth inducing impacts would occur to the extent that other landowners of Open Space land in the Piru Area of Interest would request similar development. Loss of hundreds of additional acres of prime and statewide important farmland. Potentially significant impacts on biological impacts and wildlife corridor.

ALTERNATIVE	SIGNIFICANT IMPACTS AVOIDED	SIGNIFICANT EFFECTS OF ALTERNATIVE
(assuming use of septic systems) Avoidance of gas safety impacts associated with housing adjacent to the Southern California gas metering station While the traffic and air quality impacts generated per dwelling unit would be greater than the proposed project, overall traffic and air quality would be reduced if only 146 dwelling units are constructed. Elementary school overcrowding may be avoided if a new school site is provided, or exacerbated if a new school is not provided. Local parkland deficit may be reduced if a new park site is provided. Community character impacts would be avoided with rural equestrian home development.	Significant grading required for development of pads and access roads. Proposed project and school site is within the dam inundation area of Piru Lake and Pyramid Lake. Development is within a high fire hazard area	Urban development of Rural parcels would be inconsistent with SOAR, and would result in significant impacts regarding air quality, traffic, sewage treatment, water supply, education, recreation, community character and growth inducement. Site specific impacts would vary depending upon which location is considered.
Alternative Locations on Urban and Rural Designated Sites Elsewhere in Ventura County This alternative assumes that the proposed dwelling units would be located on Rural designated properties in various locations (Bell Canyon, Camarillo, Lake Sherwood, Las Posas, Moorpark, North Half, Ojai, Simi Valley and Thousand Oaks Area of Interest)	Piru area site specific impacts would be avoided	The following alternatives were briefly evaluated and rejected: Other Community Design Alternatives: Park Centered Alternative, Dispersed Housing Alternative Alternative Locations within the Piru Area of Interest: East and West Center Street, Rancho Temescal, Higher Density Infill Development within the Piru Community
ENVIRONMENTALLY SUPERIOR ALTERNATIVE The Environmentally superior alternative is the "No Project" alternative. However, this alternative would not be consistent with the project objectives listed at the beginning of this chapter. If the environmentally superior alternative among the other alternatives. Therefore, among the project alternatives that are consistent with the project objectives, the "Mitigated Community Design Alternative" or "Piru Charrette Vision Design Alternative" (excluding the equestrian lots and center) are the environmentally superior alternatives. Additionally, with redesign of the condominium complex and the addition of a centrally located park, the James Finch Design Alternative could also be considered an environmentally superior sub-alternative for the western portion of the Piru Expansion Area.		

4. Environmental Setting, Impacts, Mitigation Measures and Residual Effects

4.1 Air Quality

In accordance with the Ventura County General Plan and the Ventura County Administrative Supplement to the CEQA Guidelines, all County agencies, departments and special districts are instructed to utilize the Air Quality Assessment Guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (APCD). Copies of these guidelines can be obtained from the APCD, 669 County Square Drive, Ventura, CA, 93003 or may be found online at <http://www.vcapcd.org>

In accordance with the adopted Air Quality Assessment Guidelines the following significance thresholds apply to the proposed project:

Regional Air Quality Impacts (Ozone):

Discretionary development projects are considered to have a significant regional air quality impact if the daily emissions for reactive organic gases (ROG) or nitrogen oxides (NO_x) exceeds 25 pounds per day. Additionally, any General Plan Amendment or revision that would provide directly or indirectly for increased population growth above that forecasted in the most recently adopted AQMP will have a significant cumulative adverse air quality impact.

Local Air Quality Impacts (Dust):

A project that may be reasonably expected to generate fugitive dust to in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which may endanger the comfort, repose, health or safety of any such person or the public or which may cause or have a natural tendency to cause injury or damage to business or property will have a significant adverse air quality impact.

4.1.1 Environmental Setting

Air pollution is hazardous to health, diminishes the production and quality of many agricultural crops, reduces visibility, degrades or soils materials, and damages native vegetation. The federal government has established National Ambient Air Quality Standards (NAAQS) to protect public health (primary standards); and welfare, such as property and agriculture (secondary standards). California has separate, more stringent standards. There are state and national standards for ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb). In addition, California has standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

The U.S. Environmental Protection Agency (EPA) is the federal agency designated to administer air quality regulations nationwide, while the California Air Resources Board (CARB) is the state agency that performs this function. Local air quality management is provided through the Ventura County APCD. The CARB is responsible for controlling mobile emission sources statewide, while the APCD is responsible for enforcing the standards that apply to stationary sources in Ventura County.

The air pollutants of most concern in Ventura County are ozone and particulate matter. Ventura County is an attainment area for all ambient air quality standards except the following:

Figure 4.1-1 Air Pollution Attainment Status

Air Pollutant	Standard	Agency	Ventura County Status
Ozone:	1 Hour	State and Federal	Non-attainment
	8 Hour	Federal	Non-attainment
PM ₁₀ :	24 Hour	State	Non-attainment Attainment/Nonclassifiable

Ozone

Ozone is formed in the atmosphere through complex chemical reactions involving reactive organic compounds (ROC) and nitrogen oxides (NO_x) with ultraviolet energy from the sun. It is readily formed above Ventura County and other areas of Southern California owing to a combination of topographical, meteorological, and air pollutant characteristics. The primary sources of ROC in Ventura County are motor vehicles, organic solvents, the petroleum industry, and pesticides. The primary sources of NO_x are motor vehicles, the petroleum industry, and power plants.

PM₁₀

Atmospheric particulate matter is comprised of finely divided solids or liquids such as dust, soot, aerosols, fumes, and mists. The particles of primary concern are those ten microns or less in diameter. These particles have the greatest likelihood of being inhaled deep into the lungs. Human-generated particulate matter results from a variety of activities: farming, industrial processes, fossil fuel combustion, construction and demolition operations, and entrainment of road dust into the air. Natural sources of particulate matter include wind-blown dust, wildfires, and salt from sea spray.

Air quality in Ventura County is also affected by transport of pollutants into the County. Some sources of this pollution include Los Angeles County, Santa Barbara County, Outer Continental Shelf oil production and exploration activity, and shipping through the Santa Barbara Channel. Pollutant transport from Los Angeles occurs by southeasterly or easterly flow aloft. Pollutants are also transported from Ventura County coastal areas to areas further inland by westerly surface winds.

Federal Clean Air Act

The first comprehensive national air pollution legislation was the federal Clean Air Act of 1970. In 1977, the federal Clean Air Act was amended to require plans for meeting the national health-based standards "as expeditiously as practicable," but no later than December 31, 1982. However, the Clean Air Act permitted the U.S. EPA to extend the attainment date of some ozone and carbon monoxide non-attainment areas.

In 1990, the federal Clean Air Act was significantly amended. The 1990 Clean Air Act Amendments (CAAA) contains a number of requirements designed to improve air quality. These include motor vehicle emission limits, pollution controls on industrial facilities, use of low-polluting vehicle fuels, permit and compliance programs, and economic incentives to encourage industries to voluntarily curtail emissions.

Under the CAAA, areas that do not meet the federal one-hour ozone standard are classified according to the severity of each area's respective ozone problem. The classifications are Marginal, Moderate, Serious, Severe, and Extreme. Marginal areas are closest to meeting the federal one-hour ozone standard. Extreme areas have the worst air quality problems. Areas with more severe ozone problems have progressively more stringent requirements to meet under the CAAA. An area's classification determines how long the area has to attain the federal ozone standard. Marginal areas had three years; Moderate areas - six years; Serious areas - nine years; Severe areas - either 15 or 17 years, depending on the magnitude of their ozone problem; and, Extreme areas - 20 years. The South Coast Air Basin and the San Joaquin Valley Air Basin are the only areas in the country designated as Extreme. Ventura County is a Severe area for the federal one-hour ozone standard and must attain the standard by 2005.

Ventura County has made significant progress toward attainment of the federal one-hour ozone standard. For years 2000 - 2002, Ventura County averaged only one ozone exceedance day per year, technically meeting the federal one-hour standard, but still officially designated a federal one-hour ozone non-attainment area. However, the federal one-hour ozone standard has been replaced by the 8-hour ozone standard adopted by EPA in 1997. The EPA adopted the 8-hour ozone standard after scientific studies concluded that the one-hour standard was inadequate to protect human health.

After lengthy legal proceedings, EPA officially designated all areas of the country either "non-attainment", or "attainment/unclassifiable" for the federal 8-hour ozone standard on April 15, 2004. The designations were based on EPA's analysis of ambient ozone levels in each area. The EPA designated Ventura County a moderate non-attainment area for the 8-hour ozone standard. As a moderate area, Ventura County is required to attain the federal 8-hour ozone standard by June 15, 2010. With the 8-hour designations in place, the Environmental Protection Agency (EPA) is scheduled to revoke the federal one-hour ozone standard nationwide on June 15, 2005.

In July 1997, EPA created new ambient air quality standards for PM_{2.5} designed to better protect the public from the adverse effects of airborne particulate matter. The standards include an annual average and a 24-hour standard. On December 17, 2004, the EPA reclassified Ventura County from "non-attainment" to "attainment/nonclassifiable". This designation became effective on April 4, 2005.

California Clean Air Act (CCAA)

The CCAA was enacted on September 30, 1988, and became effective January 1, 1989. The purpose of the CCAA is to achieve the health-based state clean air standards at the earliest practicable date. The state standards are more stringent than the federal air quality standards. Under the CCAA, District wide air emissions must be reduced at least five percent per year (averaged over three years) for each non-attainment pollutant or its precursors. A district may achieve a smaller average reduction if the District can demonstrate that, despite inclusion of every feasible measure in its air quality plan, it is unable to achieve the five percent annual reduction in emissions.

Similar to the federal Clean Air Act, the CCAA also classifies areas according to pollution levels. Under the CCAA, Ventura County is a severe ozone non-attainment area, and is a state PM₁₀ non-attainment area.

Ventura County Air Quality Management Plan (AQMP)

The 1991 AQMP was prepared in response to the CCAA. The 1991 AQMP elaborated on information contained in the 1982 and 1987 AQMPs. It also included new and modified control measures designed to move the county further toward achieving state clean air standards.

The 1994 AQMP was prepared to satisfy the planning requirements of the CCAA and to outline a strategy for meeting the federal one-hour ozone clean air standard while accommodating anticipated growth. The Plan indicated that Ventura County would not be able to attain the federal one-hour air quality standard for ozone by 2005 without inclusion of measures contained in a document called a Federal Implementation Plan (FIP).

The District prepared a revision to the 1994 AQMP in 1995. This revision updated information that had changed since the 1994 AQMP, including minor adjustments to the 1990 baseline emission inventory, actions taken by the CARB to approve additional control strategies, changes to the photochemical modeling, and several other changes. The 1995 Plan Revision indicated that Ventura County would attain the federal one-hour ozone standard by 2005 without implementation of proposed FIP measures. The EPA approved the 1994 AQMP and 1995 AQMP Revision on February 7, 1997.

The District prepared 1997 and 2004 AQMP Revisions that updated the proposed adoption and implementation dates for nine control measures that were included in the 1995 AQMP Revision. The EPA approved the 1997 AQMP Revision on April 21, 1998. The 2004 AQMP revision was adopted on April 13, 2004. The 1994 AQMP (together with the 1995, 1997 and 2004 AQMP Revisions) is the current air quality management plan for Ventura County. The current AQMP will be revised in 2007 to update emissions forecasts and incorporate air quality modeling and any needed control measures to achieve attainment with the new federal 8-hour ozone standard.

VCAPCD maintains six air quality monitoring stations in Ventura County (Ventura, El Rio, Thousand Oaks, Piru, Ojai and Simi Valley). According to the California Air Resources Board website (<http://www.arb.ca.gov/homepage.htm>) Piru experienced a total of 104 exceedances of the State 1-hour standard and Federal ozone 8-hour standard over the past 5 years (about 21 exceedances per year average). Piru did not experience any exceedances of the Federal 1-hour standard during this period. By comparison the Ventura and El Rio stations detected zero exceedances; Thousand Oaks experienced 40 exceedances, while Ojai and Simi Valley experienced 136 and 172 exceedances over this five-year period.

Ventura County Ozone Trends Summary

Year	State Standard	Federal Standard		Maximum Concentration	
	1-hour	1-hour	8-hour	1-hour	8-hour
2005	17	0	11	0.121	0.100
2004	22	0	17	0.122	0.098
2003	41	2	31	0.130	0.114
2002	22	1	15	0.132	0.109
2001	34	2	24	0.129	0.113

Piru Ozone Trends Summary

Year	State Standard	Federal Standard		Maximum Concentration	
	1-hour	1-hour	8-hour	1-hour	8-hour
2005	7	0	2	0.119	0.100
2004	6	0	4	0.104	0.090
2003	27	0	16	0.119	0.103
2002	10	0	8	0.123	0.100
2001	16	0	8	0.115	0.099

4.1.2 Impacts

Regional Air Quality Impacts

APCD staff used the "URBEMIS 2002 for Windows" (Version 7.5.0) computer model to estimate emissions associated with this project. A downloadable copy of this model is available on the South Coast Air Quality Management District's at the following website:

<http://www.aqmd.gov/ceqa/urbemis.html>

The pass-by trips option was turned on for all runs associated with this project. This allows the URBEMIS 2002 program to adjust project emission estimates by applying the recommended default pass-by and diverted-linked rates of vehicle travel. A "pass-by" trip occurs when a driver makes a stop at a location while en route to another primary designation. The pass-by stop happens because the driver was already going to that locale and therefore, does not create a primary trip. Diverted-linked trips are those that are attracted from the traffic volume on roadways within the vicinity of the generator but require a diversion from that roadway to gain access to the site. Pass-by and diverted-linked trips associated with a project generate substantially lower levels of net emissions than a primary trip.

Component A (John Rieder) Emission Estimates

Component A's emission estimates were modeled based on the application materials indicating that a 60-unit townhouse project is proposed for this area. The District's run assumed an operational year of 2006, as the application does not indicate when this project would be completed.

The URBEMIS 2002 computer model determined this portion of the project would release estimated emissions (area plus operational) of 7.58 lbs/day of Reactive Organic Gases (ROG) and 7.33 lbs/day of Nitrous Oxides (NO_x).

Component B (Dana Levy) Emission Estimates

Component B's emission estimates were modeled based on the proposed 104 single-family detached residential units planned for this area. The District's run assumed an operational year of 2006, as the application does not indicate when this project will be completed. The URBEMIS 2002 computer model determined that this portion of the project could potentially release estimated emissions (area plus operational) of 16.62 lbs/day of ROG and 18.83 lbs/day of NO_x.

Component C (James Finch) Emission Estimates

Component C's emission estimates were modeled based on the project description submitted by the applicant. The applicant indicates up to 139 single-family detached residential units and up to 46 multi-family units could be constructed. Based upon the applicant's statement that the property is subject to a long-term agricultural lease, it is assumed that the project would not be completed until at least 2010. The URBEMIS 2002 computer model determined that this portion of the project could potentially release estimated emissions (area plus operational) of 22.57 lbs/day of ROG and 22.69 lbs/day of NO_x. However, as no specific site plan or tract map has been submitted, the actual project emissions for this component could be higher or lower than this depending on a number of project specific design features, which would alter the input parameters for the URBEMIS 2002 computer model.

Component D (Ventura County) Emission Estimates

Because there is no applicant for Component D, the emission estimates were modeled based on maximum potential development of the project acreage at 6 dwelling units per residential acre, or 45 dwelling units, and assuming development of APN 56-0-18-07 with up to 2,814 square feet of additional highway-oriented commercial development. The District's run assumed development of this parcel would not occur until at least 2010. The URBEMIS 2002 computer model determined this portion of the project could potentially release estimated emissions (area plus operational) of 6.22 lbs/day of ROG and 6.84 lbs/day of NO_x. However, as no specific site plan or tract map has been submitted, the actual project emissions for this component could be higher or lower than this depending on a number of project specific design features, which would alter the input parameters for the URBEMIS 2002 computer model.

Component A, B, C and D Combined Regional Air Quality Impact

By adding the emission estimates for all four components the subject project has the potential to generate 52.99 lbs/day of ROG and 55.69 lbs/day of NO_x. However, the actual project emissions could be higher or lower than this depending on a number of project-specific design features, which would alter the input parameters for the URBEMIS 2002 computer model, particularly for components C and D, which are more speculative than components A and B.

The 2003 Ventura County Air Quality Assessment Guidelines (2003 Guidelines) describe what constitutes a significant air quality impact. A copy of the 2003 Guidelines can be accessed from the downloadable materials section of the APCD website at <http://www.vcapcd.org>

Based upon information provided by the applicants, the project's overall air quality impacts would exceed the 25-lbs/day thresholds for ROG and NO_x, as described in the 2003 Guidelines. Therefore, the project would have a significant impact on regional air quality.

Cumulative Regional Air Quality Impacts

The 2003 Guidelines state: "Any General Plan amendment that will result in population growth above that forecasted in the most recently adopted AQMP is inconsistent with the AQMP. It will therefore have a significant cumulative adverse air quality impact."

The 2003 Guidelines state that the Piru Growth Area is forecasted to have a population of 1,759 in 2005. Based on figures provided by the Ventura County Planning Division (through December 31,

June 2004) the estimated population within the Piru Growth Area is 4,754 1,703. Therefore, the Piru Growth Area's population is currently 4 56 persons less than forecasted, and as such is currently consistent with the AQMP. However, the proposed project seeks to add up to 394 (Components A, B, C and D) additional dwelling units to the Piru Growth Area. Based on data obtained from the 2000 Census, the average household size in the community is 3.66 persons per household. Therefore if all 394 potential new dwelling units were developed, this could result in an additional population of 1,442 people.

In summary, any increase in dwelling units of this magnitude would result in population growth above that forecasted in the most recently adopted AQMP, and would therefore have a significant impact on cumulative regional air quality.

Local Air Quality Impacts

The proposed project is expected to generate fugitive dust emissions during the grading and construction phase. Since these local air quality impacts would be short-term in nature, the impacts would be reduced to less-than-significant levels with implementation of standard fugitive dust control conditions listed below.

General Plan Air Quality Policies

The General Plan *Goals, Policies and Programs* were reviewed for applicability to the proposed project. The project was determined to be consistent with the relevant air quality goals, policies and programs, with the exception of the following:

- Policy 1.2.2-1 *Discretionary development that is inconsistent with the Air Quality Management Plan (AQMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.*
- Policy 1.2.2-3 *Discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. Developers shall be encouraged to employ innovative methods and technologies to minimize air quality impacts.*

The proposed project will exceed the AQMP population/dwelling unit projection for the Piru growth area. Thus, the project is inconsistent with the AQMP and therefore inconsistent with Policy 1.2.2-1. In order to approve the project the Board of Supervisors must adopt a statement of overriding considerations. If the project is approved, its population will be accounted for in future amendments to the AQMP. Once this occurs, the potential inconsistency with Area Plan Policy 1.2.2-1 will dissolve.

Additionally, the proposed project would exceed APCD threshold standards of 25 pounds per day of ozone precursors (NOx and ROC). Recommended mitigation (see Section 4.1.3 below) would include various measures designed to encourage transportation by means other than the automobile (e.g., construction of bicycle pathways, and pedestrian-friendly street features, and construction of a bus turnout) and various energy conservation measures designed to reduce energy consumption. Even with all of these measures the project would still result in significant impacts regarding ozone precursors. As allowed by the AQMP, the applicants will be required to buy down the remaining excess emissions by payment of a TDM fee totaling \$266,000. The funds collected under this measure are expected to be utilized to subsidize van pooling or public transit for the Piru Community. Therefore, with mitigation as recommended the project will be consistent with Policy 1.2.2-3.

The *Piru Area Plan* Air Quality goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant *Piru Area Plan* goals, policies and programs, with the exception of the following:

- Policy 1.7.2-1 *Discretionary projects which could have significant adverse air quality impacts shall be conditioned to avoid, minimize or compensate for the air quality impact. Projects which are inconsistent with the Air Quality Management Plan (AQMP) shall be prohibited.*

Piru Area Plan Policy 1.7.2-1 essentially mirrors the County General Plan policies 1.2.2-1 and 1.2.2-3, discussed above.

4.1.3 Mitigation Measures

Mitigation for Fugitive Dust:

AQ-1 The following dust control procedures ~~should~~ shall be implemented during the projects' construction phase:

- a. The area disturbed by clearing, grading, earthmoving or excavation shall be minimized to prevent excessive amounts of dust.
- b. Regular ground-wetting of roads and graded areas (at least twice daily with complete coverage on all active areas). The use of environmentally safe chemical dust pallatives should be used, if directed by the APCD.
- c. All trucks shall be required to cover their loads as required by California Vehicle Code §23114.
- d. Adjacent streets shall be swept at the end of each work day, if visible soil material is carried over to adjacent streets.
- e. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties) all clearing, grading, earth moving and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.
- f. Signs should be posted limiting on-site speed limits to 15 mph.
- g. Prior to initiation of grading, all adjacent homes will be provided with appropriate phone numbers in the event of dust complaints. These numbers shall include the site superintendent/supervisor as well as the APCD Compliance Division, APCD's 24-hour complaint line and the Planning Division's condition compliance personnel.
- (h) Use of other Best Management Practices (BMP's), as determined necessary by APCD.

Mitigation for Reduction in Ozone Precursor Production:

AQ-2 The applicants shall promote alternative modes of transportation as follows:

- (a) Applicants shall fund construction of an enhanced Main Street Plan that incorporates the following:
 - (1) Construction of a bicycle/pedestrian pathway along Main Street from Highway 126 to connect to existing sidewalks north of the railroad tracks.
 - (2) Construction of bus turnouts and covered waiting areas on each side of Main Street, at a location to be determined by the Public Works Agency, in consultation with the Ventura County Transportation Commission.
 - (3) Construction of bulb-outs and pedestrian-activated signals to facilitate safe pedestrian crossing of Main Street.
- (b) Internal street systems of proposed subdivisions shall be designed to encourage pedestrian and bicycle transportation by:
 - (1) Incorporation of pedestrian friendly design, including traffic calming mechanisms (such as traffic circles and bulb-outs).
 - (2) Separation of pedestrian and vehicular traffic through the use of landscaped parkways.

- (3) Incorporation of an internal bicycle/pedestrian pathway network to facilitate bicycle and pedestrian access to schools, parks, commercial centers and existing and planned community pathways (such as the Main Street bicycle/pedestrian pathway and railroad bicycle/pedestrian pathway), wherever feasible.
- (4) Bicycle locker or lockable storage areas shall be provided at all commercial retail and multi-family and community park sites within the proposed development area.

AQ-3 Applicants shall submit an energy conservation plan designed to reduce energy consumption by the following means:

- (a) All buildings shall incorporate energy-saving design solutions to reduce energy consumption by at least 20 percent below Federal guidelines as specified in Title 24 of the Code of Federal Regulations. This may be accomplished through such measures as improved insulation, double-paned windows, more efficient heating/ventilation, skylights, use of solar or low emission water heaters and/or use of compact florescent light bulbs.
- (b) New technology, such as solar electric generation systems or residential fuel cells, shall be showcased in model homes and made available as an option to buyers.
- (c) Shade trees shall be used to reduce heat build-up on structures to reduce energy used for cooling.
- (d) ~~Each homeowner shall be provided with an electric or battery-powered lawnmower and edger. Conditions, covenants and restrictions shall prohibit the use of gasoline-powered landscape maintenance equipment by homeowners.~~

The Leadership in Energy and Environmental Design (LEED) is a building rating system for the design, construction, and operation of high performance environmentally friendly or "green" buildings. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. For additional information concerning the LEED program and energy conservation, applicants are advised to contact the US Green Building Council at <http://www.usgbc.org/>. For local case studies and resources the Green Building Council of Ventura County at <http://www.gbvc.org/> may be contacted.

APCD staff estimates ROC emission reductions of 1.9% and NO_x reductions of 5.4% if all of the above mitigation measures are implemented. The residual project emissions would be 51.99 lbs/day of ROC and 52.7 lbs/day of NO_x. The above mitigations would not reduce project impacts to below the significance threshold standard of 25 lbs/day. In order to address significant residual project emissions, the following additional measure should be required:

AQ-4 Applicants shall contribute to an off-site transportation demand management (TDM) fund to be managed by the APCD. The formula for calculating this fee is established by the 2003 Guidelines (see Appendix 8.4). Applicants would be required to pay for NO_x emissions in excess of the 25 lbs per day standard over a three-year period. The 2005 cost is calculated at \$8.77 per pound of NO_x. The estimated three year NO_x buy-down is calculated as follows:

John Rieder	\$ 35,645
Dana Levy	\$ 89,112
James Finch	\$108,265
County of Ventura	<u>\$ 32,985</u>
TOTAL	\$266,007

The TDM fee is a one-time fee and averages about \$675 per dwelling unit. Funds should shall be collected by the Ventura County Planning Division prior to tract map recordation and used for

mitigation projects or programs within the Piru area of interest. Funds may be used to help fund transit service, vanpool programs/subsidies, rideshare assistance programs and off-site TDM facilities or other mitigation program as determined by the Planning Division and the APCD, after consultation with the Piru Neighborhood Council.

Mitigation for Cumulative Regional Air Quality Impacts:

AQ-5 APCD will revise the AQMP population forecast for the Piru Growth Area in order to be consistent with any Board of Supervisors approved General Plan Amendment for the Piru Expansion Area.

AQ-6 The Board of Supervisors shall amend Piru Area Plan Policy 1.7.2-1 to add the phrase "unless overriding considerations are cited by the decision-making body".

Measure AQ-6 would make the language in the Piru Area Plan Policy 1.7.2-1 conform to Countywide General Plan Policy 1.2.2-1.

4.1.4 Residual Impact

Measures AQ-2 and AQ-3 APCD would reduce ROG emission reductions by 1.9% and NO_x reductions by 5.4%. The residual project emissions would be 51.99 lbs/day of ROG and 52.7 lbs/day of NO_x, which would still exceed the significance threshold standard of 25 lbs/day.

In theory, the above TDM funds could cover the local match required for extending bus service to the Piru Community. The funds could likewise be used to fund a variety of rideshare programs. It is unknown how many Piru residents might be induced to participate in rideshare or utilize public transit. In any case, a project that implements a 3-year buy-down is considered to have reduced the significant project environmental impact to a less than significant level (2003 Guidelines).

Cumulative regional air quality impacts associated with inconsistency with the AQMP will be fully mitigated once the AQMP has been amended as described above. Additionally, the potential inconsistency with General Plan Policy 1.2.2-1 and Piru Area Plan Policy 1.7.2-1 will also dissolve if measure AQ-6 is adopted.

4.2 Surface Water Quality

The County Initial Study Assessment Guidelines state that the significance threshold criteria for surface water quality a land use or activity that could cause a significant adverse impact upon surface water quality in itself or on a cumulative basis. Threshold criteria include, but are not limited to:

1. Any land use proposal that will degrade the quality of surface water and cause it to fail to meet surface water quality objectives for a hydrologic unit defined in the current adopted Water Quality Control Plan, Santa Clara River Basin 4A Plan is a significant adverse impact.
2. In cases where the proposed land use impact upon the quality of surface water is unknown or the quality of surface water in a hydrologic unit is unknown, the impact is unknown and must be determined by additional investigation.

4.2.1 Environmental Setting

Surface Water Bodies

The project is located within the Santa Clara River watershed, which is the largest river system in southern California that remains in a relatively natural state. Surface water resources in the Piru area principally consists of Lake Piru, (operated by United Water Conservation District [UWCD]) and located about four miles north of the community of Piru; Piru Creek, a tributary of the Santa Clara River, located about 0.4 miles east of the Piru Expansion Area; and the Santa Clara River, located about 0.5 miles south of the project area. The Santa Clara River is the primary receiving surface water for drainage from the Piru Expansion Area. Additionally, UWCD operates several groundwater recharge basins near Piru, the closest recharge basin is immediately east of the Rieder and Levy projects.

Lake Piru – Lake Piru is UWCD's storage reservoir for water that is later released into spreading grounds to percolate into underground aquifers. Subsequent uses are wholesaling to retail purveyors, agricultural use and recharge. The capacity of Lake Piru is 88,000 acre-feet, with an annual safe yield of 15,000 acre-feet per year.

Piru Creek – Water from Lake Piru flows into Piru Creek. Piru Creek is a biologically rich habitat area. The reach from Santa Felicia Dam to the Santa Clara River supports habitat for a variety of aquatic wildlife, including the endangered southwest arroyo toad. Water is diverted from Piru Creek to irrigate agricultural operations in the Piru area. Additionally UWCD diverts water from Piru Creek into spreading grounds which comprise approximately 100 acres of land, located east and southeast of the Piru Expansion Area.

According to the Regional Water Quality Control Board (RWQCB) Piru Creek is considered to be impaired with respect to pH, which is defined as follows:

The pH value of water, on a scale of 0 to 14, measures the concentration of hydrogen ions. Pure distilled water is considered neutral, with a pH reading of 7. Water is basic if the pH is greater than 7; water with pH of less than 7 is considered acid. For every one unit change in pH there is approximately a ten-fold change in how acidic or basic the sample is. Some species, such as trout, are sensitive to changes in pH; immature stages of aquatic insects and immature fish are extremely sensitive to low pH values. An unimpaired water body should have a pH between 6.5 and 8.5. Piru Creek pH values range from 7.3 to 9.6, with an average reading of 8.5. However, since some streams are naturally acidic — or basic — pH may not necessarily indicate pollution. Some factors that may affect pH include the concentration of carbon dioxide in the water, air pollution and the geology and soils of the watershed.

Santa Clara River – The Santa Clara River is the largest river system in southern California that remains in a relatively natural state. It drains a watershed of 1,634 square miles and flows westward from the San Gabriel Mountains of Los Angeles County a distance of about 84 miles through Ventura County along the southern edge of the Los Padres National Forest. Major tributaries include Castaic and San Francisquito Creeks in Los Angeles County, and the Sespe, Piru, and Santa Paula Creeks in

Ventura County. In the past, the river has been heavily mined for aggregate. The upper river, which runs through the City of Santa Clarita, is currently undergoing extensive urbanization. Farming operations have intruded well into the floodplain along the lower sections of the river in Ventura County.

UWCD collects Santa Clara River water at the Freeman Diversion several miles downstream of the Piru Expansion Area and diverts natural surface flows in the Santa Clara River to spreading basins or recharge ponds in the Oxnard Forebay basin to replenish the aquifers beneath the Oxnard Plain. United also supplies diverted surface water directly to agricultural users on the Oxnard Plain and the Pleasant Valley area via its Pumping Trough Pipeline (PTP). Releases from Lake Piru in the later summer or fall, when sufficient supplies are available, provide surface flows that act as groundwater recharge but also enhance agricultural deliveries at a time when the Santa Clara River is normally dry.

The river supports a great variety of flora and fauna. Extensive patches of high-quality riparian habitat, totaling over 4,000 acres, are present along the entire length of the river. The Santa Clara River was selected by American Rivers as one of the nation's ten most endangered rivers for 2005.

Pollutants

According to the RWQCB, the reach of the Santa Clara River in the Piru area of Interest is considered to be impaired with respect to chloride, ammonia, and nitrate, which are described below:

Chloride - Chloride is a chemical found in salts. It is an indicator of sewage, animal wastes and agricultural runoff. It is present in all potable water supplies and in sewage, usually as a metallic salt. Chloride is essential in the diet and passes through the digestive system unchanged to become one of the major components of raw sewage. High salt levels can harm crops and wildlife.

ORWQCB considers a river impaired if the salt concentration exceeds 100 milligrams per liter (mg/L). Chloride concentration in the Santa Clara River have been measured as high as 138 mg/L but average around 105 mg/L. Chloride concentrations tend to be higher during low water (drought) conditions.

Ammonia - Ammonia is the most reduced inorganic form of nitrogen in water. Nitrogen-fixing bacteria living in a symbiotic association with plants in soil or water reduce nitrogen to ammonia and the ammonium ion. Although ammonia is only a small component of the total nitrogen cycle, ammonia contributes to the fertility of water, since nitrogen is an essential plant nutrient. Ammonia is a common constituent of treated sewage. It may also be discharged from a variety of industrial and cleaning operations that use ammonia or ammonium salts. Ammonia has many effects on fishes, including a reduction in hatching success, reduction in growth rate and morphological development, and pathologic changes in tissues of gills, livers, and kidneys. Freshwater phytoplankton and vascular plants are more tolerant to ammonia than invertebrates or fishes.

RWQCB considers a water body impaired if ammonia concentrations exceed 2.7 mg/L (at average pH and temperature) in waters designated as "warm". The Santa Clara River has been measured as high as 4.9mg/L but averages 2.4 mg/L.

Nitrate - Nitrate and nitrite are inorganic forms of nitrogen in the aquatic environment. Nitrate along with ammonia are the forms of nitrogen used by plants. Nitrates and nitrites are formed through the oxidation of ammonia by nitrifying bacteria, a process known as nitrification. Nitrogen, in its various forms is usually more abundant than phosphorus in the aquatic environment; therefore, nitrogen rarely limits plant growth as does phosphorus. Aquatic plants are not usually as sensitive to increases in ammonia and nitrate levels. Sources of nitrates are the atmosphere, inadequately treated wastewater from sewage treatment plants, storm drains, poorly functioning septic systems, and agricultural runoff. Overuse of agricultural fertilizer has been identified as a significant contributor to high nitrate levels in surface and groundwater. Farmers consider overuse of fertilizer to be cost-effective, as the cost of overuse is less than the potential loss from underuse, and fertilizer costs comprise a relatively small portion of total production costs.

RWQCB considers a water body impaired if Nitrate concentrations exceed 10 mg/L. The Santa Clara River has been measured as high as 15.4 mg/L with an average concentration at 5.7 mg/L.

On August 7, 2003, the RWQCB adopted a Total Maximum Daily Load (TVDL) for nitrogen in the Santa Clara River watershed. The TDML must be reviewed by the State Water Resources Control Board and the U.S. Environmental Protection Agency and requires up to eight years of study. When the studies are completed nitrogen loading rates will be assigned to dischargers, such as the Piru Wastewater Treatment Plant. Thus future requirements may be stricter than current RWQCB requirements.

Regulatory Setting

Clean Water Act - The federal Clean Water Act was adopted in 1974 and has been amended numerous times. This act controls the discharge of toxic materials into surface water bodies. The primary purpose of the act is to restore the chemical, physical and biological integrity of the nation's waters and to achieve a level of water quality which provides for recreation in and on the water.

Safe Drinking Water Act - This act was adopted by Congress in 1974 and gives the EPA the authority to establish and enforce guidelines for the achievement of minimum national water quality standards for every public water supply system serving 25 people or more. California's drinking water standards are based upon the federal standards created by EPA.

Porter-Cologne Water Quality Control Act - State legislation passed in 1987 provides the authority for the State of California to implement a comprehensive water quality control program that includes surface and groundwater and establishes waste discharge requirements for point and non-point source discharges.

Safe Drinking Water and Toxic Enforcement Act - In 1986, the California legislature adopted this act which prohibits the discharge or release of any significant amount of chemical known to cause cancer or reproductive toxicity into the drinking water supply.

National Pollutant Discharge Elimination System (NPDES) - As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. NPDES permits are administered by the State through the RWQCB.

Piru (including the Piru Expansion Area) is within the region covered by an NPDES Permit issued by the RWQCB on July 27, 2000. The purpose of this permit is to govern the non-point discharges associated with stormwater drainage.

Ventura County Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) - The above NPDES permit requires preparation of a SQUIMP. The requirements of this mitigation plan are intended to reduce impacts of urban runoff and construction on local waterways and the Pacific Ocean. The SQUIMP contains design standards for treatment control and establishes Best Management Practices (BMPs) for stormwater runoff for most new construction and development projects. Various BMPs that use Best Available Control Technology (BACT) are to be implemented to:

- (1) Treat the storm flow equivalent to 10% of the 50-year peak flow or treat the volume of annual runoff to achieve 80 percent or more volume treatment by the method recommended in the Ventura Countywide Stormwater Quality Management Program Technical Guidance Manual for Stormwater Quality control Measures;
- (2) Conserve natural areas;
- (3) Protect slopes and channels;
- (4) Provide storm drainage system stenciling and signage;
- (5) Properly design outdoor material storage areas; and
- (6) Properly design trash storage areas.

Applicants may select from a variety of measures/technology to achieve the desired results. The purpose of these measures is to control pollutants of concern.

Prior to issuance of a zoning clearance, encroachment permit, or grading permit, the applicant must submit the project plans and documents to the Watershed Protection District, Water Quality Section demonstrating that the proposed SQUIMP required Best Management Practices (BMPs) for stormwater treatment will mitigate pollutants of concern.

The applicant is required to use the Ventura Countywide Stormwater Program "Technical Guidance Manual for Stormwater Quality Control Measures" (Technical Guidance Manual), the California Stormwater Quality Association (CASQA) "BMP Handbooks" and/or other approved reference documents as the basis of NPDES mitigation design.

Complete SQUIMP information and the Technical Guidance Manual for Stormwater Quality Control Measures are available on the Ventura Countywide Stormwater Quality Management Program web site at: <http://www.vcstormwater.org/publications.html>.

4.2.2 Impacts

The potential impacts of urban development in the Piru Expansion Area include sediment discharge from heavy rains during the construction phase, contamination of surface water from urban runoff and secondary impacts associated with discharges from the Piru Wastewater Treatment Plant. These potential impacts are offset at least in part by a decrease in agricultural runoff which can result in introduction of both sediment and of nitrates and other chemicals from agricultural operations.

Sediment Discharge

Project construction activities will expose 62 acres of soil that potentially could be subject to soil erosion and sediment discharge into the Santa Clara River if heavy rains occur during the construction phase of the project. The site is generally flat with a slight slope to the southwest. The site drains to the Santa Clara River and away from Piru Creek and the UWCD percolation basins. Most of the site is currently subject to exposed soil conditions due to existing agricultural operations. Thus much of the site is already subject to erosion and sediment discharges during heavy rainfall events.

Applicants for construction projects that will disturb one or more acres of soil must file a Notice of Intent for Coverage under the State General construction Activity Stormwater Permit with the RWQCB and develop and implement a Stormwater Pollution Control Plan (SWPCP). Conformance with these requirements should reduce the impact to stormwater due to short-term construction related erosion of soils to a less-than-significant level. Once construction is completed, over-covering of soils and residential landscaping is expected to reduce the potential for soil erosion and sediment discharge below the pre-project condition.

Urban Runoff Discharge

In any developed area, the urban storm runoff contains various elements washed from street or parking lot surfaces and from building rooftops. These elements typically include hydrocarbons from street paving, motor oil, detergents from car washing and other polluting elements from a variety of sources.

The Rieder Component includes landscaped courtyards that would double as stormwater detention basins during storm events. The Levy project also includes a proposed stormwater detention facility. These facilities are discussed in Chapter 4.7. No stormwater facilities have been designed for Components C and D (Finch, County of Ventura). It is assumed that an additional stormwater detention basin will be provided west of the Finch property to accommodate stormwater flows from the Finch and Thompson properties (See Chapter 4.7). In addition to addressing stormwater runoff, these detention facilities improve runoff quality by allowing for the settling of solids and removal of nutrients and dissolved pollutants. Active pollutant removal mechanisms include sedimentation, filtration of suspended solids by vegetation, infiltration, biological uptake of nutrients by aquatic plants and algae, volatilization of organic compounds, uptake of metals by plants and biological conversion of organic compounds.

To address urban runoff contamination impacts, water quality drain inlets to the basins will be equipped with filters to retain oil and grease and reduce pollutant loads. Additional BMP controls downstream of the detention basins will include media filtration such as sand or synthetic filters, commercially developed treatment systems and biofilters in the form of grassy swales. These methods will be required as part of the SQUIMP. Therefore, although development would increase urban runoff pollutant loading, implementation of BMPs required by the SQUIMP are anticipated to reduce the potential for downstream pollutant contamination to less than significant.

Additionally, as discussed in chapter 4.7 (Flooding, Erosion and Drainage Facilities), when full of water, the stormwater detention basins can pose a human health risk, exposing residents to various toxins and pathogens, such as coliform bacteria. To address this health risk, the applicants will be required to post warning signs, and detention basins will be subject to various requirements, which may include requirements for fencing, location of children's play equipment and vending machines with plastic baggies shall be made available and public signs posted encouraging people to clean up after their pets. See additional discussion in Chapter 4.7.

Piru Wastewater Treatment Plant (PWWTP) Expansion

In order to build the proposed projects, the PWWTP must first be expanded to provide adequate capacity (See Chapter 4.11). The Public Works Agency has prepared plans to expand and upgrade the plant. When completed, wastewater produced at the PWWTP will be treated to tertiary standards. This will substantially improve the quality of wastewater produced at the plant site. The Public Works Agency hopes to market the treated wastewater for landscaping irrigation, industrial uses or agricultural irrigation.

Hopper Creek is a tributary of the Santa Clara River located adjacent to the Piru Wastewater Treatment Plant. There is a potential for an impact to water quality in Hopper Creek in the event of a sewage plant spill. The potential for such an event exists currently on the site. In the event of a spill, a County Environmental Health Division-approved sewer spill response plan would be implemented. The spill response plan includes procedures for sampling and positing of warning signs. The proposed plant expansion is designed to accommodate increased wastewater flows which could exacerbate the potential magnitude of a spill, however, treated wastewater would be of a much higher quality and the volume of a release would not necessarily be increased due to the plant expansion since it would be dependent upon the nature of the release. According to the environmental document prepared for the PWWTP expansion, the increased risk of water degradation from a plant upset incident is considered adverse, but less than significant.

As discussed in Chapter 4.11, water softeners in the proposed expansion area may contribute to increased chloride content at the wastewater treatment facility. The County Water and Sanitation Department advises that the existing PWWTP outflow occasionally exceeds the chloride waste discharge requirements (WDRs) set by the RWQCB. The standard established by the RWQCB for the PWWTP is 100 mg/L. For the period from March 2003 to July 2004, the Water and Sanitation Department reported that chloride levels ranged from 71 mg/L to 140 mg/L. In part, the periodic exceedances of the RWQCB chloride standard are due to the high salt content in the potable water supply provided by Warring Water Service. Warring Water's chloride content was tested recently and determined to contain 65 to 67 mg/L of chloride. Because of the relatively high chloride content of the potable water supply, RWQCB allows the chloride standard to be effectively increased to 152 mg/L. Thus the PWWTP is not in violation of RWQCB requirements.

Assuming that the new development would install water softening equipment at about the same ratio as existing homes in the Piru Community, Water and Sanitation Department anticipates that new development would have a less than significant impact on chloride levels at the PWWTP.

General Plan Surface Water Quality Policies

The General Plan *Goals, Policies and Programs* and *Piru Area Plan* were reviewed for their applicability to the proposed project. The project was determined to be consistent with all of the relevant General Plan policies with respect to surface water quality. In addition, the *Water Management Plan* policies were reviewed for their applicability to the proposed project. The project

was determined to be consistent with the relevant *Water Management Plan* policies with respect to water quality.

4.2.3 Mitigation Measures

No significant impacts were identified with respect to surface water quality; therefore no mitigation measures are required. See Chapter 4.7 regarding additional requirements for stormwater detention basins to address risk of human contact with urban runoff toxins and pathogens when the stormwater basins are full of water.

4.2.4 Residual Impact

No significant impacts were identified with respect to surface water quality.

4.3 Biological Resources

This chapter was prepared based upon field reconnaissance surveys and reports prepared by Rincon Consultants, Inc. contract biology consultants for the County, dated February 2005—and, A supplementary field reconnaissance was conducted by Rincon Consultants in October 2005 to evaluate secondary impacts to downstream drainage channels.

The Ventura County *Initial Study Assessment Guidelines* define the criteria and methodology for determining whether a proposed project may have a significant adverse impact on biological resources. Biological resources include natural plant and animal species and their habitats, communities, and ecosystems. The *Guidelines* identify the following as significant biological resources: endangered, threatened or rare species, wetland habitats, migration corridors for fish or wildlife, and locally important species/communities.

Thresholds of significance for biological resources are determined on a case-by-case basis by a qualified biologist. A significant impact to endangered, threatened, or rare species would occur if a project directly or indirectly reduces the species population, reduces species habitat, or restricts reproductive capacity. A significant impact to wetland habitat would result from the direct reduction, or indirect impact on, wetland habitats that are deemed significant. A significant impact to a migration corridor may result if a project would substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or the intimidation of fish or wildlife via introduction of noise, light, development or increased human presence. Due to the diversity of species and communities represented, in order to determine the potential significance of impacts on locally important species/communities, review by a qualified biologist is required.

4.3.1 Environmental Setting

Biological resources within the Piru Area of Interest include natural plant and animal species and their habitats, communities, and ecosystems. The United States Geological Survey (USGS) Piru topographic quadrangle map and aerial photography of Piru were reviewed utilizing computer maps (Topozone; TerraServer). The onsite elevation ranges from approximately 645 to 665 feet above mean sea level, with the highest elevation located on the northern side of the expansion area. The expansion area is bordered by: agricultural row crops to the west; the Fillmore-Piru Association citrus packing plant and residential development to the north; United Water Conservation Percolation Basins to the east; commercial, residential and industrial development along with Highway 126 to the south. Vacant industrial and agricultural land and additional percolation basins occur south of Highway 126. A five-acre Habitat for Humanity residential tract, containing 22 single-family homes, lies east of Main Street between Components A and B.

The expansion area is vegetated primarily by non-native vegetation consisting of agricultural orchards and row crops and to a lesser extent by ruderal and urban landscape species in the residential, commercial and industrial areas. The descriptions of these man-made communities follow Holland and Keil (1990) and include Agrestal (cultivated) and Plantation (orchards) habitats in agricultural areas, Urban Mix (landscaping) in residential and developed areas, and Ruderal (weedy) habitat interspersed throughout the expansion area. Native habitats do not occur within the expansion area due to the highly disturbed nature of the agricultural and developed lands. Orchards are subject to agricultural maintenance, harvest, and weed and pest control practices. Row crops are additionally subject to more frequent agricultural disking. Residences, commercial and industrial areas are subject to landscape care, such as lawn mowing, weed and pest control. Agricultural and residential expansion areas are subject to vehicular traffic.

Endangered, Threatened, or Rare Species

The Piru Area of Interest is host to numerous special status species. These are species of plants and animals that are designated endangered, threatened or rare by the California Fish and Game Commission or the U.S. Secretary of Commerce. Additionally, there are many species whose survival

and reproduction in the wild are in immediate jeopardy and are considered to be sensitive to further intrusion upon their habitat. Species that are not listed under the federal Endangered Species Act or the California Endangered Species Act, but which nonetheless are declining at a rate that could result in a designation of endangered, threatened, or rare are classified as species of special concern.

A search of the California Natural Diversity Database (CNDDB) via the RAREFIND2 software (January 2005) listed 21 wildlife species, six plant species, and 13 habitats that could occur within a 10-mile radius of the expansion area. The search area incorporated a large diversity of habitats and conditions, including several of which are not found within the expansion area and immediate surroundings. Additionally, some raptor species without records on the CNDDB have the potential to occur within the expansion area and are also included in this analysis due to their protection under the federal Migratory Bird Treaty Act of 1918 (MBTA) (16 USC 703; 50 CFR 10.13). Also, all active raptor nests are protected under Section 3503.5 of the California Fish and Game (CDFG) Code.

Wetland Habitat

Wetland habitats are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is periodically covered with shallow water. Wetlands may also include open water habitats like lakeshores. Many special status species are dependent upon wetland habitats for their survival. Wetlands include, but are not limited to, marshes, bogs, sloughs, vernal pools, wet meadows, river and stream overflows, mudflats, ponds, springs, and seeps. Wetlands and riparian areas support high species diversity and abundance and are consequently the most valuable wildlife habitats. There are no wetland habitats within the Piru Expansion Area. Warring Wash formerly existed along the western boundary of the expansion area. This wash was re-routed north of the railroad tracks in 1974, and now flows into Real Canyon Wash ¼ mile to the west. The UWCD percolation ponds provide wetland habitat just east of the Piru Expansion Area.

Migration Corridors for Fish and Wildlife

Migration corridors connect two large habitat areas and allow freedom of movement for animals. In addition, they often provide the only available habitat for species that occupy the corridor area. Biologists have identified areas that experience recurrent aquatic, riparian, or terrestrial species movement that are crucial to these species as migration corridors or habitat linkages. These migration corridors encourage preservation of plant and animal populations by allowing greater access to food and a larger gene pool.

The Piru Area of Interest hosts a wide diversity of wildlife including mammals, birds, amphibians, reptiles, fish and invertebrates. Local residents have reported seeing mountain lions, bear tracks, red racer snakes, and a multitude and variety of birds, bugs and frogs in and around the Piru Expansion Area. Some of these species migrate along ridgelines in the mountainous terrain where there are fewer interfaces with urban uses. Other species migrate along the arroyos, rivers and other riparian and wetland corridors, where urban development is nearer and the potential for adverse impacts much greater when these natural habitats are encroached upon.

A map of known migration corridors located in the south half of Ventura County was prepared by the South Coast Wildlands Project in their 2000 *Missing Linkages Report*. A 1992 study completed by Envicon that focused on wildlife movement in the Santa Susana Mountains reveals additional migration corridors in east Ventura County. Figure 4.3-1 depicts a preliminary mapping of identified migration corridors within the Piru Area of Interest. The corridors reflected in Figure 4.3-1 show the primary habitat linkages that allow movement of wildlife from the Los Padres National Forest in the western Transverse Mountain Range to the Santa Monica Mountains located in southeastern Ventura County. In addition, passages through wetlands and riparian habitat are also delineated.

Barriers to the above migration corridors in the Piru Area of Interest include developed areas (Piru Community, Rancho Sespe Farmworker Housing Project) and roadways (especially State Highway 126).

The diverse topography and climate of the Piru Area of Interest provide an environment where a number of plant and animal communities exist. Unique vegetation communities in the Piru Area of Interest include coastal sage scrub and riparian woodland, among others. Unique species range from mammals and invertebrates to various species of birds, fish, and reptiles. Some of these are locally important species or communities that have been identified by local biologists to be characteristic of or unique to the county or region. Others are considered candidates for a designation of endangered, threatened, or rare by the California Fish and Game Commission or the U.S. Secretary of Commerce.

[illegible]

4.3.2 Impacts

A field reconnaissance survey was conducted by Rincon Consultants, Inc. contract biologist Kathy Frye on February 2, 2005 to determine the general extent of biological resources within the expansion area. The field reconnaissance included a vehicle and binocular review along the perimeter of the proposed expansion area, with occasional entry into the four Component areas, as accessible by vehicle or foot. A red-tailed hawk (*Buteo jamaicensis*) was heard calling and was observed soaring over the expansion area. Local residents have reported seeing hawks nesting in the trees within the Rieder property.

No special-status plant species were observed during the February 2005 expansion area survey. The six sensitive plant species located by the CNDDDB are not known or expected to occur within the expansion area due to routine agricultural and residential maintenance activities and the lack of suitable habitat. These plant species include Plummer's mariposa lily, San Fernando Valley spineflower, slender-horned spineflower, round-leafed filaree, California Orcutt grass, and Lyon's pentachaeta.

No special-status wildlife species were observed during the February 2005 expansion area survey, with the exception of a red-tailed hawk, a raptor species protected by the MBTA. Raptors in general are discussed below in regard to the Cooper's hawk.

The 13 rare habitats located by the CNDDDB are generally associated with aquatic corridors or woodlands and are not found within the expansion area. The expansion area is out of the elevation and geographic range for the mountain yellow-legged frog; therefore, this federally-listed amphibian is not expected onsite. One reptile species identified in the CNDDDB records as existing in the area, the California western whiptail, has no federal, State or local listing status; no suitable habitat for this species exists within the expansion area. Therefore, the California western whiptail will receive no further consideration in this analysis. The four sensitive fish species recorded by CNDDDB are not known or expected to occur within the expansion area due to the lack of aquatic habitat. These fish species include the southern steelhead – southern California ESU, arroyo chub, Santa Ana sucker, and unarmored threespine stickleback. Similarly, wildlife species associated with aquatic habitats are not known or expected to occur onsite, including four sensitive birds, one amphibian, and one reptile reported by CNDDDB. These species are noted respectively as: the western yellow-billed cuckoo, least Bell's vireo, yellow warbler, and yellow-breasted chat; arroyo toad; and two-striped garter snake. Three wildlife species identified in the CNDDDB, including a ground-dwelling reptile, the coast horned lizard, and two mammal species, the San Diego desert woodrat and the American badger, are not known or expected within the expansion area due to the lack of suitable habitat.

Other transient wildlife may utilize the area for foraging, but are not expected to breed within the expansion area due to the lack of suitable breeding habitat and routine agricultural and residential maintenance activities. Suitable to marginal habitat for four sensitive wildlife species located by the CNDDDB occurs within the grasslands, trees and aquatic habitat of the United Water Conservation District percolation pond property. This habitat is outside of the project area, but the species are considered in this analysis because, if present, they may be subject to disturbance from development activity in the expansion area. Special-status wildlife species that have the potential to occur within or directly adjacent to the expansion area include:

- Western spadefoot (*Spea [Scaphiopus] hammondi*), a toad occurring in grassland and valley and foothill woodland habitats and breeding in temporary natural pools, has also been known to breed in man-made pools and stock ponds. A State species of concern.
- California condor (*Gymnogyps californianus*), a bird known to the Sespe-Piru Condor area in Los Padres National Forest (LPNF) utilizing vast areas of savannah, grassland, and chaparral. A federal and state endangered species.
- Cooper's hawk (*Accipiter cooperii*), a raptor nesting in woodlands and trees. A State species of concern (nesting).
- Burrowing owl (*Athene cunicularia*), a ground-dwelling bird of grasslands, deserts and scrubland. Dependent on burrowing mammals for nesting locations, most notably, the California ground squirrel. A State species of concern (burrow sites; winter observations with or without burrows in Ventura County).
- Western mastiff bat (*Eumops perotis californicus*), a bat found in a variety of arid to semi-arid habitat that roosts in cliff faces, buildings, trees and tunnels. A State species of concern.

The United Water percolation ponds may provide marginal breeding habitat for the western spadefoot, if water were present through the egg and tadpole metamorphosis period. In natural conditions, that period may last up to five weeks and is dependent upon rain events that generally occur in late winter or spring. Additionally, the grassland surrounding the ponds may provide marginal foraging or

aestivation habitat for western spadefoot. The project area does not currently provide suitable upland for the western spadefoot, if present on adjacent land, as the project area is subject to regular disturbances resulting in an inhospitable environment for burrowing species. These disturbances include vehicular traffic and the regular maintenance, harvesting and agricultural practices associated with the orchard operations. Impacts due to residential development would be expected to be as detrimental to western spadefoot as the existing condition; therefore, impacts to spadefoot toad may be adverse, but would be considered less than significant.

The California condor occurs to the north within Los Padres National Forest and is capable of traveling up to 140 miles to forage. The expansion area is within the foraging range used by the condor. The loss of approximately 60 acres of marginal foraging habitat, in the form of agricultural land, would be considered less than significant, due to the amount of suitable foraging habitat remaining in the vicinity. Additionally, while condors could potentially overfly the site, they would not be expected to utilize the area for foraging.

Non-native Eucalyptus trees within the percolation pond area, in residential areas, and within the southwestern border of the expansion area, may provide suitable nesting habitat for the Cooper's hawk, a State species of concern, or other raptors or vultures protected by the MBTA. The MBTA makes it unlawful to "take" (damage, destroy, remove, either intentionally or unintentionally) birds, nests, egg or young in the nest of any species under the act's protection. The take provision also includes any disturbance that causes a nest to fail and/or the loss of reproductive effort. Raptor nests are also protected by the California Department of Fish and Game (CDFG). The loss of reproductive effort or a take under the MBTA or CDFG code would be considered a significant impact.

The rodent burrows in the grassland and/or the earthen berm separating the United Water percolation ponds from the expansion area may provide suitable nesting or wintering habitat for the burrowing owl. Disturbance of the burrowing owl or its burrows would be considered a potentially significant impact.

Building eaves and trees occurring within the expansion area may provide suitable roosting habitat for the western mastiff bat. Suitable foraging habitat the western mastiff bat occurs throughout the expansion area. The conversion of approximately 60 acres of agricultural land to residential development would continue to provide marginal roost and foraging habitat, although the type and source of those habitats would change (e.g. more eaves *versus* trees for roosting and more landscaping *versus* orchards and row crops for foraging). Surrounding agricultural land would continue to provide roosting and foraging habitat in the vicinity. Therefore, impacts to the western mastiff bat would be considered less than significant.

The expansion area is not within the critical habitat of any endangered or threatened species; therefore, no impacts to critical habitat would occur. Project implementation would not result in cumulative impacts for any of the species reviewed in this section.

Wetland Habitat

Warring Wash, located west of the expansion area Components C and D, was removed by the County in 1974. Flood waters were diverted north of the railroad tracks to Real Canyon Wash located further west. The former Warring Wash in this vicinity is currently a small agricultural ditch with no significant riparian resources. This was confirmed during the February 2005 survey when the ditch was observed to support scant non-native grasses and forbs. No water was observed in the ditch within the vicinity of the project area. Based on the lack of hydrophytic vegetation, the ditch does not appear to be a wetland. While details regarding grading and development for Components C and D were not available for review at the time of this analysis, the conversion of this land from an agricultural to a residential or commercial designation would not result in a significant impact to wetland resources.

The expansion area has the potential to degrade water quality if urban contaminants are allowed to overflow from the Components A and B (Reider and Levy Components) to the percolation ponds along the eastern border of the expansion area. The Reider and Levy Components along the eastern border of the project area have been designed to direct flows away from the United Water percolation ponds. The offsite percolation ponds, whether jurisdictional or non-jurisdictional wetlands, would be protected by proposed project grading designs and additionally by the requirements of the RWQCB for the

development area. Therefore, indirect impacts to wetland habitat would be less than significant. No other wetland habitats are known to occur within the project area.

Migration Corridors

The County of Ventura IS Assessment Guidelines (2000) state that *a significant impact to a migration corridor would result if a project would substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development or increased human presence.*

A conference conducted in 2001 and sponsored by the California Wilderness Coalition, The Nature Conservancy, the Biological Resource Division of the United States Geological Survey, the Center for Reproduction of Endangered Species, and California State Parks produced a series of maps identifying habitat linkages throughout California based on the opinions of the people present at the conference. The conference report, *Missing Linkages: Restoring Connectivity to the California Landscape*, identifies a series of habitat linkages in the Santa Clara River Valley that basically follow drainages directed north and south from the Santa Clara River, a major "landscape linkage" and important wildlife corridor. A series of links (all designated No. 22 on Figure 6-1 – *South Coast Missing Linkages*) are identified in the general Piru area between Fillmore and the City of Santa Clarita, of which one of them is assumed to be Piru Creek. It is noted that in the "South Coast Vision Map," the Piru area lies within a general "connectivity" zone, which is identified as an area that connects larger, more important habitat areas.

The existing project area and the majority of the adjacent land contain non-native agricultural land, residential, commercial and industrial development, a percolation pond, a major highway, and community roads. The project area does not contain nor does it provide a direct connection to or from habitats containing native vegetation. Migration is blocked through the existing project area by chain link fences within or along the expansion area perimeter, solid cement block fences along residential areas in the vicinity, and by lack of suitable habitat necessary to sustain wildlife within the area. Wildlife species utilizing the project area are currently subject to intimidation due to the presence of noise, light, humans, agricultural practices, and vehicular traffic from agricultural operations and surrounding community roads and a state highway. The conversion of approximately 60 acres of agricultural land to residential or commercial development would increase the density of human presence in an area containing no native habitats and already containing barriers to physical migration. Therefore, project impacts to migration corridors are considered less than significant. It is further noted that species being partially blocked by development would alternately be able to utilize adjacent open agricultural land for passage. Wildlife species may also utilize the primary migration corridors occurring within the expansion area vicinity and identified in the linkage study, including: Piru Creek, approximately 0.4 miles to the east; the Santa Clara River, approximately 0.5 miles to the south; Hopper Canyon Creek, approximately two miles to the west; and native coastal sage scrub habitat, approximately 0.75 miles to the north.

Locally Important Species/Communities

No locally important species or communities were observed or are expected to occur within the project area. No significant impacts to locally important species or communities are anticipated.

Secondary impacts to Downstream Drainage Channels

Due to erosion potential (see Chapter 4.7 - Flooding, Erosion and Drainage Facilities) the Public Works Department may require improvements to downstream drainage facilities between the Piru Expansion Area and the Santa Clara River. These drainages include Warring Wash south of Highway 126 and a flood control channel located adjacent to Torrey Road between Highway 126 and the Santa Clara River. A supplementary biological resource evaluation was conducted by Rincon Consultants in October 2005 to evaluate these downstream channels.

Warring Wash was found to contain some water from orchard overflow, but only ruderal grasses and weeds with no wetland plants. At the terminus of this wash the channel is blocked with no apparent outlet into the sandy dry wash of the Santa Clara River.

The channel/ditch along Torrey Road is mostly barren rock, pebbles and dirt with virtually no vegetation. It was dry at the time of the field visit and contained no biological resources of any importance.

As no riparian or wetland resources were noted, no significant impacts to biological resources would be expected from armoring of these drainage facilities. However, these ditches/washes may nonetheless be considered to be within the California Fish and Game and Army Corps of Engineers jurisdiction and any modifications of the existing channels would likely require permitting with these agencies.

General Plan Biological Resource Policies

The General Plan *Goals, Policies and Programs* and *Piru Area Plan* were reviewed for their applicability to the proposed project. The project was determined to be consistent with all of the relevant General Plan policies with respect to biological resources.

4.3.3 Mitigation Measures

The following mitigation measures are recommended to be included as conditions of the tentative tract maps and residential planned development permits to mitigate the impacts to biological resources as noted above:

BR-1 Prior to recordation of a tract map, a special-status wildlife survey shall be performed in accordance with CDFG guidance or as follows:

During both the wintering and nesting seasons, a qualified biologist shall conduct surveys for burrowing owls in potential habitat areas prior to construction in accordance with guidelines described in the *CDFG Staff Report on Burrowing Owl Mitigation, 1995*. Winter surveys shall be conducted between December 1 and January 31, and the nesting season survey shall be conducted between April 15 and July 15. If burrowing owls are detected within the proposed disturbance area, CDFG shall be contacted to develop and implement a mitigation plan to protect owls and their nest sites.

BR-2 Prior to construction during the migratory bird/raptor nesting season, a survey for active nests shall be conducted by a qualified wildlife biologist at the site no more than two weeks prior to any scheduled development or grading. If active nests of any MBTA-protected bird species are located, construction within 500 feet of nest trees (e.g. Eucalyptus, Monterey Pine, or landscape trees) shall be limited to the time period after young have fledged and prior to the next season's breeding period. This is generally September 1 to February 1, although a qualified biologist shall confirm that breeding/nesting is completed and young have fledged. Nest trees shall only be removed outside of the nesting season, or after a qualified wildlife biologist verifies that the nest is empty and no longer used by a raptor.

4.3.4 Residual Impact

With mitigation as recommended above, biological resources will be reduced to less than significant levels.

4.4 Agricultural Resources

Agricultural resources include lands that are used to grow crops for human and animal use, or for livestock forage. These might include seasonal row crops, citrus orchards, and alfalfa. The Ventura County *Initial Study Assessment Guidelines* define the criteria and methodology for determining whether a proposed project may have a significant adverse impact on agricultural resources. Any proposed non-agricultural development/land use that results in the following would have a potentially significant impact:

- Loss of soils designated Prime, Statewide Importance, Unique or Local Importance;
- Use of the same water resources as agriculture when the use is for non-agricultural purposes;
- Increased dust, reduced solar access, or elimination of windbreaks within one-half mile of a property currently in, or suitable for, agricultural production;
- Decrease in beneficial organisms or natural or man-made protection against harmful biological organisms within one-half mile of a property currently in, or suitable for, agricultural production.
- Location of incompatible land uses in proximity to agricultural land resulting in increased vandalism, pilferage, trespass or impact from chemical spraying.

4.4.1 Environmental Setting

Ventura County's agriculture plays a vital role in the local economy and consistently ranks among the most profitable in California. In 2004, the County's agricultural businesses grossed over \$1.3 billion dollars worth of commodities. This prolific production was made possible by the presence of high quality soils, adequate water supply, favorable climate, long growing season, and level topography. The combination of these factors makes Ventura County one of the world's most favored agricultural areas.

Existing Agricultural Operations

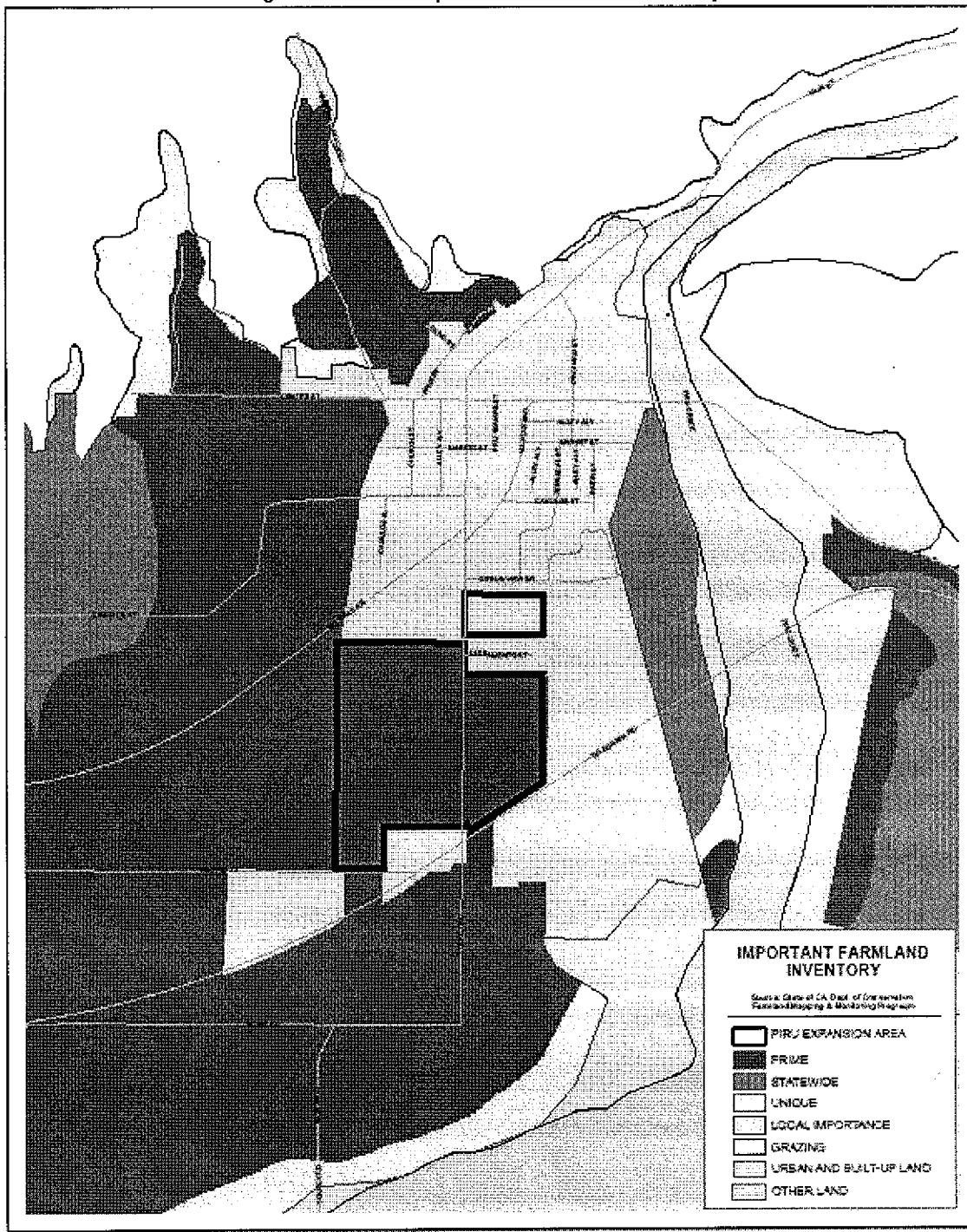
Agricultural operations in the vicinity of the proposed expansion area include citrus cultivation and row crops, agricultural produce stands and nursery stock. Citrus products are transported to the Fillmore-Piru Citrus Association Packing Plant, just north of the project area. The packing plant is planning modifications of its facilities to accommodate processing an expanded number of crops (in addition to citrus products).

Agricultural Soils

The California Department of Conservation (Farmland Mapping and Monitoring Program) inventories county farmland by categorizing it in classes based on the productive capability of the land. Figure 4.4-1 shows the inventory of important farmlands in the vicinity of Piru. In the Important Farmlands Inventory (IFI) used by the county, the areas with the highest agricultural potential are classified as "Prime", or "Statewide Importance", followed by "Unique", "Local Importance", "Grazing", and "Urban". Prime farmlands are irrigated soils over 40 inches deep with water holding capacity of 4 inches or more. Farmlands of Statewide Importance are land other than Prime that has a good combination of physical and chemical characteristics. Unique farmlands are lands other than Prime or of Statewide Importance that are currently used for the production of specific high value food and fiber crops such as citrus, avocados, vegetables, etc. The criteria for farmlands of Local Importance include uses such as production of food, fiber, forage and oilseed crops on lands that are not identified as having statewide importance. Farmlands classified as Prime, Unique, or of Statewide Importance are given special consideration in CEQA when converted to non-agricultural uses.

Agriculture is the primary land use within the Piru Area of Interest. Within the Piru Area of interest, 3,915 acres are designated as "Prime" farmland, 934 acres are designated as farmland of "Statewide Importance", 710 acres are designated as "Unique" and 1,191 acres of farmland are defined as being of "Local Importance". The acreage balance, including hillside acreage and Piru Creek and Santa Clara River floodway areas, are designated as "Grazing" or "Other Land" (30,515 acres). The Piru Community itself, along with some surrounding areas is designated as "Urban and Built-up Land".

Figure 4.4-1 Important Farmlands Inventory



Land Conservation Contracts

The Land Conservation Act (LCA) of 1965, (also known as the Williamson Act) provides for the preservation of agricultural land by restricting its development and maintaining a low tax rate. This is accomplished via a contract between the property owner and the County. Land may be placed in an agricultural preserve if the parcel in question meets certain size, use and zoning criteria. Under the LCA contract, the farmer abandons his development rights for a period of ten years in exchange for favorable tax treatment. At the end of each year, the LCA contract is automatically renewed for ten more years, unless a Notice of Non-Renewal is filed by the property owner with the County. A request to cancel an LCA contract prior to expiration must meet several criteria and, if approved by the Board of Supervisors, a substantial financial penalty is imposed. Existing LCA contracts in the vicinity of the Piru Community are illustrated on Figure 4.4-2.

Greenbelt

Greenbelt agreements are joint or co-adopted policy agreements between the County and one or more interested cities. These policy agreements have the effect of protecting open space and agricultural lands and of reassuring property owners located within these areas that lands will not be prematurely converted to agriculturally incompatible land uses. A greenbelt agreement for the area between Fillmore and the Los Angeles County line was adopted by the Board of Supervisors and the City of Fillmore on October 2000. This Fillmore-Piru Greenbelt is illustrated on Figure 4.4-3. The Fillmore-Piru Greenbelt includes all of the Piru Area of Interest, except for the existing Piru Community and the proposed Piru Expansion Area. The Greenbelt Agreement states that the County and City agree to a policy that would prohibit urban development or annexation of land within the Greenbelt and commits the County to maintain agricultural and open space uses within this area.

4.4.2 Impacts

Significant direct and indirect impacts are expected on agricultural resources as a result of the proposed Piru Area Plan Update. The following discussion addresses both direct and indirect impacts:

Loss of Prime Agricultural Soils

Except for the Rieder component, which is identified as "urban and built-up land", the balance of the proposed Piru Expansion Area is located on soils designated "Prime" farmland under the California Department of Conservation Farmland Mapping and Monitoring Program, *Important Farmlands Maps*. The soil on Rieder property is identified as Mocho Loam (0-2% slope). This soil type meets the criteria for Prime Farmland as outlined by the U.S. Department of Agriculture's Land Inventory and Monitoring Program for the Ventura Area Soil Survey. The *Ventura County Initial Study Assessment Guidelines* for agricultural resources impacts (September 2000) state that for properties with prime soils and designated "Agricultural" on the County General Plan, the loss of 5 acres of soils through removal or permanent covering would result in significant project impacts. Therefore, despite the designation on the Important Farmlands Map, the Rieder property contains prime agricultural soils. As the project would result in the loss or over-covering of 57.3 62.3 acres of prime agricultural soils, the project would result in a significant project and cumulative impact to agricultural soils.

In addition, as discussed in the Hydraulic Hazards/Flood Control and Drainage Chapter, the Finch component is expected to require approximately 2.85 acres of stormwater detention. Mr. Finch's application does not indicate where stormwater detention would occur. Given the local topography of the site (which slopes gradually from the northeast to southwest) and presuming that the applicant would elect to maximize his development potential, the most likely location for a detention basin is southwest of the Finch property within the agricultural area. Thus, the stormwater detention basin for the Finch component may result in the loss of an additional 2.85 acres of prime agricultural soils.

Figure 4.4-2 Land Conservation Act Contracts

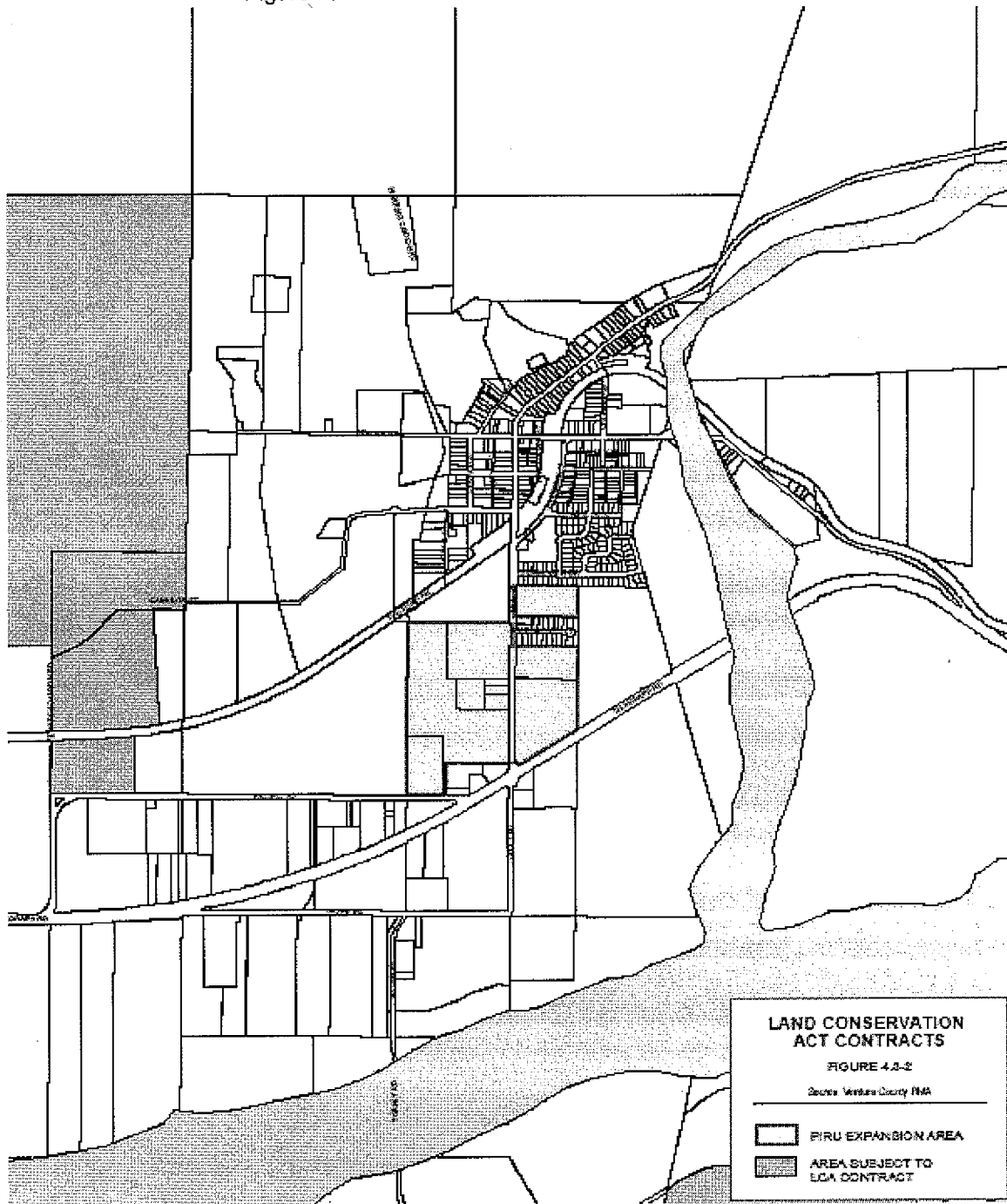
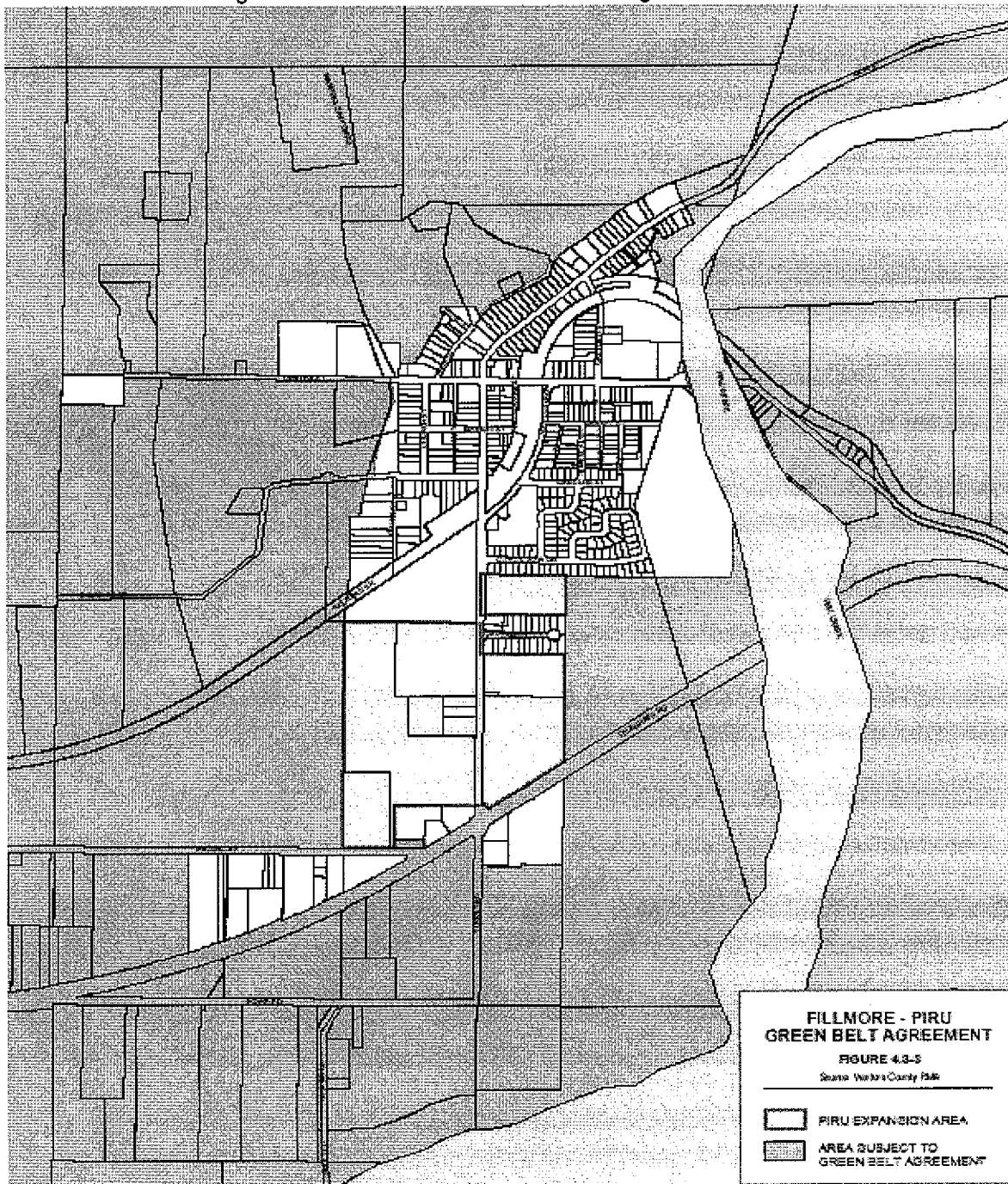


Figure 4.4-3 Fillmore-Piru Greenbelt Agreement



A road circulation design has not been submitted for the Finch component. However, because the Finch property is located adjacent to on-going agricultural operations an agricultural buffer will be required. Because roads may be constructed in the A-E zone and roads may be included as part of an agricultural buffer, it is presumed that the applicant would elect to maximize his development potential by placing an access road along the west side of the property. Such a road would be expected to consume about 2.6 acres of prime agricultural land.

Whether or not a road or stormwater detention basin is located west of the Finch property, an agricultural buffer will be required. An agricultural buffer must be at least 150 feet wide, including a vegetative buffer. Within this 6.5 to 13-acre agricultural buffer area, growers would be expected to curtail standard agricultural practices (with respect to pesticide management) in order to minimize potential impacts to planned residential land uses.

Thus, the project would result in the direct loss of ~~57.3~~ 62.3 acres of prime agricultural soils and may impact an additional 6.5 acres of land for agricultural buffer, stormwater detention and street circulation purposes. This is considered a significant adverse impact on agricultural resources.

Land Use Conflicts

The proposed developments would create a new interface between the remaining agricultural operations west of the proposed Piru Expansion Area and the proposed residential development within the expansion area. This interface would exist primarily west of the Finch component. An interim agricultural/residential interface would also occur south of the Finch component, adjacent to the Thompson property, assuming that this property will not develop in the near term. The Thompson property is within the Ventura County component and is currently developed with a citrus orchard and a single-family residence. This interim interface with the Thompson property would dissolve, if and when the Thompson property is developed with residential lots. At that time a new agricultural/residential interface would occur west of the Thompson property along the western boundary of the Piru Expansion Area.

The presence of residences in close proximity to agricultural operations diminishes the viability of commercial agriculture on the remaining agricultural properties due to curtailment or limitations on normal agricultural practices that may result in complaints related to noise, dust, pesticide overspraying, odors, and other nuisances associated with normal agricultural activities. Ventura County has adopted a Right-to-Farm ordinance that provides farmers with a limited degree of protection from nuisance-type lawsuits. However, even with the Right-to-Farm ordinance, many farmers and agricultural contractors are unwilling to conduct some farm practices, such as aerial spraying, with residential development in such close proximity.

Along this agricultural/residential interface farmers can expect increased trespass and resulting increase in vandalism, pilferage, and introduction of pests, disease and weeds from improperly maintained residential vegetable gardens and ornamental plants. Additionally, site preparation grading can result in excessive dust on crops, which in turn can reduce photosynthesis and spread plant diseases.

Therefore, the proximity of housing and commercial agricultural operations is expected to result in significant land use conflicts to both the farmers and the future residents.

The nearest property with an LCA contract is located approximately ½ mile west of the Piru Expansion Area (LCA Contract 2-3.2). Therefore, the proposed project will not adversely affect any farm parcels with LCA contracts.

The proposed expansion is adjacent to but outside the boundary of the Fillmore-Piru Greenbelt. Therefore, the project would be consistent with the Fillmore-Piru Greenbelt.

General Plan Agricultural Resource Policies

The General Plan *Goals, Policies and Programs* were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the possible exception of the following:

- Policy 1.6.2-1 Discretionary Development located on land designated as Agriculture and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory, shall be planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
- Policy 1.6.2-6 Discretionary Development adjacent to Agricultural-designated lands shall not conflict with agricultural use of those lands.
- Policy 3.2.2-4(1) The Agricultural land use designation shall primarily include lands which are designated as *Prime Farmlands*, *Farmlands of Statewide Importance* or *Unique Farmlands* in the State's Important Farmland Inventory (IFI), although land may not be designated Agricultural if small areas of agricultural land are isolated from larger blocks of farming land (in such cases, the agricultural land is assigned to the Open Space or Rural designation of the surrounding properties).

The *Piru Area Plan* Agricultural Soils and Agricultural Land Use goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the possible exception of the following:

- Policy 1.8.2-1 Discretionary permits located on land designated as "Prime" or "Statewide Significance" by the State's Important Farmlands Inventory shall be planned and designed to remove as little land from agricultural production as possible and minimize impacts on topsoil.
- Policy 3.7.2-2 Land outside the Piru Urban and Existing Community areas shall be designated as Open Space or Agricultural.
- Policy 3.7.2-3 All discretionary development shall be reviewed to ensure that impacts on agriculture are minimized.

As discussed previously, the project would directly remove ~~57.3~~ 62.3 acres of prime agricultural land from the Agricultural land use designation and may indirectly impact 6.5 acres for an agricultural buffer.

Countywide policies 1.6.2-1 and 3.2.2-4(1), and Area Plan policy 3.7.2-2, do not preclude the Board of Supervisors from re-designating the subject site from Agriculture to Urban. The SOAR Ordinance does not apply to the proposed Piru Expansion Area. Therefore, ~~so long as the project does not conflict with other policies and programs designed to preserve agricultural resources;~~ the project would not be found to be inconsistent with the General Plan policies noted above.

In addition to the direct loss of productive agricultural land and over-covering of agricultural soils, the project would place residential development adjacent to remaining agricultural land, resulting in potential land use conflicts with planned residential development on the Finch and Thompson properties. Thus, the project is potentially in conflict with countywide policy 1.6.2-6, and Area Plan policies 1.8.2-1 and 3.7.2-3. Recommended mitigation measures AR-5, AR-6, AR-7 and AR-8 (see section 4.3.3 below), include requiring an agricultural buffer to reduce the impacts to the adjacent agriculture, allowing a finding of consistency with these policies.

4.4.3 Mitigation Measures

Mitigation for Loss of Prime Agricultural Soils:

- AR-1** In the event that topsoil removal and export is required as part of any project grading operation, topsoil from the project site shall be stockpiled and incorporated into parks and landscaped areas in the project. Any excess topsoil shall be offered to an offsite agricultural operation as a soil amendment.

Measure AR-1 would utilize topsoil which might otherwise be lost as the site is graded for development. Topsoil preservation as indicated in measure AR-1 has been practiced on other properties in Ventura County and is considered feasible.

Mitigation for Construction Dust Impacts:

In addition to the fugitive dust control measures identified in the Air Quality chapter, the applicants for the Finch and Thompson properties shall comply with the following additional measures:

- AR-2** During the grading and construction phase, on-site vehicle speed shall be limited to 15 miles per hour.
- AR-3** Graded and/or excavated inactive areas of construction shall be monitored by construction personnel at least weekly for dust stabilization. Soil stabilization methods, such as application of water and dust control materials, and roll compaction, shall be periodically applied to portions of the construction site that are inactive for over four days.
- AR-4** If grading and construction of the proposed project causes excessive dust deposition on agricultural crops, the grading contractor shall cooperate with the grower to wash the crops with water.

Measures AR-2 and AR-3 are similar to APCD Best Management Practices and are considered feasible. If, despite application of dust mitigation, dust damage to adjacent crops occurs, measure AR-4 would ensure that the damage would be repaired.

Mitigation for Land Use Conflicts:

The following mitigation measures are applicable to Finch and Thompson properties, which abut agricultural development:

- AR-5** At the time of purchase, each homebuyer shall be provided a copy of the Ventura County Right-to-Farm Ordinance.
- AR-6** A minimum 150-foot wide agricultural easement buffer area with vegetative screen and eight foot high chain-link fence shall be provided along the property line between adjacent Agricultural designated land operations and any new residential or park land uses housing units. The 150-foot easement buffer area may include the following uses:
- Roadways and driveways
 - Front yard setbacks on residential lots
 - Parking lots and garages
 - Landscape features (including the vegetation buffer described in Measure AR-7)
 - Storage sheds or open storage
 - Greenhouse structures (if venting is directed away from residential areas)
 - Fencing
 - Range cattle or sheep, and other animals as may be approved by the Agricultural Commissioner's Office.
 - Drainage facilities (including stormwater detention basins)
 - Single use government, institutional or educational ~~or private~~ facilities, where notification, agreements and operational accommodations between parties can easily occur prior to spraying.
 - Farm and produce stands where notification between farmers and occupants can easily occur prior to spraying.

- Agricultural tourism in accordance with a CUP

The 150 foot buffer may be reduced if, prior to recordation of any tract map adjacent to existing agricultural designated land, the developer shall obtain from the owner of the adjacent agricultural designated property an agricultural easement or enter into a contract with the grower to compensate for increased farming costs or reduced revenues resulting from the need to modify standard, legal farming practices (e.g., when or how pesticides are applied, types of pesticides that are applied) due to potential conflicts associated with the development of the proposed residential project subject to the approval of the Agricultural Commissioner.

~~The owners of the Finch property and the Thompson property may agree to waive the requirement for an agricultural easement/contract between the two properties if urban development of both properties is anticipated by both parties within three years.~~

AR-7 The applicant shall install a vegetative buffer screen in accordance with Mitigation Measure AR-6 that meets the following along the west property line and between the Finch and Thompson properties (to minimize potential land use conflicts and adverse effects associated with agricultural operations, including pesticide applications). The minimum requirements for the vegetative buffer are as follows:

- The vegetative buffer shall consist of two staggered rows of trees/bushes characterized by foliage that extends from the base of the plant to the crown.
- The two staggered rows shall be planted five feet apart and consist of minimum five-gallon plants at least six feet in height, planted 10 foot on center at the time of installation.
- Trees and shrubs shall be vigorous, drought tolerant and shall have 50% to 75% percent porosity (i.e., approximately 50 to 75 percent of the vegetation is air space).
- Plant height shall vary, in order to capture drift within four feet of ground applications.
- A mature height of 15 feet or more is required for trees
- Recommended plants include: Toyon (*Heteromeles arbutifolia*), Sugarbush (*Rhus ovata*), Laurel Sumac (*Malosma laurina*), and Italian cypress (*Cupressus sempervirens*).

A landscape plan and a plan for long-term maintenance of the required vegetative buffer screen shall be submitted to the Planning Director for approval prior to recordation of the tract map. The vegetative buffer screen shall be planted prior to issuance of a zoning clearance for site grading.

~~The owners of the Finch property and the Thompson property may agree to waive the requirement for an agricultural buffer between the two properties if urban development of both properties is anticipated by both parties.~~

AR-8 To deter trespassing, pilferage and vandalism of agricultural crops, the applicant shall install a reinforced eight-foot chain link fence on the agricultural side of the vegetative buffer screen described in measure AR-7.

4.4.4 Residual Impact

Implementation of the above measures will reduce impacts to agricultural resources, but loss of up to ~~63.8~~ 68.8 acres of prime agricultural land is still considered a significant adverse impact. If the project is approved, decision-makers will need to adopt a statement of overriding considerations. The dust measures and development of an agricultural buffer, as described above, will reduce the land use conflicts associated with residential development adjacent to agriculture to less-than-significant levels. These measures will also assure compliance with General Plan policy 1.6.2-6, and Piru Area Plan policies 1.8.2-1 and 3.7.2-3.

4.5 Historical Resources

Historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code SS5024.1, Title 14 CCR, Section 4850 et. seq.).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements, Section 5024.1(g) of the Public Resources Code.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource.

Technical terms for historic resources can be found in the Ventura County *Initial Study Assessment Guidelines*. For historic resources, a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. The significance of an historic resource is materially impaired when a project:

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

4.5.1 Environmental Setting

Historical resources within the Piru Area of Interest include National Historic Landmarks, sites listed on the National Register of Historic Places, sites listed on the State Register of Historic Resources, Ventura County Historical Landmarks and sites identified by the Piru Area Plan that should be considered for designation as a County Historical Landmark.

National Historic Landmarks are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, fewer than 2,500 historic places bear this national distinction. 130 National Historic Landmarks have been designated in California. Only one site has been designated in Ventura County:

Figure 4.5-1 Rancho Camulos



Rancho Camulos (Landmark No. 553) – This site consists of a museum, the Del Valle adobe and various farm and ranching buildings and structures dating from the time of Mexican rule in California. National Landmark status was conferred on February 16, 2000. The structures on the site were seriously damaged by the 1994 Northridge earthquake. Repairs are currently underway. Rancho Camulos is located 2.2 miles east of the Piru Community. (5164 East Telegraph Road, Piru)

National Register – The National Register of Historic Places is the Nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The National Register is administered by the National Park Service, which is part of the U.S. Department of the Interior. The Secretary of the Interior has listed more than 78,000 sites nationwide. To date, 34 sites within Ventura County have been listed on the National Register of Historic Places. The only National Register listed site within the Piru Area of Interest is the above referenced Rancho Camulos, which was listed in 1996 (#96001137)

California Register of Historical Resources - The State Historic Resources Commission is responsible for maintaining a statewide inventory of historical resources, including historical landmarks and points of interest. This inventory is the California Register of Historical Resources.

An historical resource may be listed in the California Register if it meets any of the following criteria: (1) it is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) it is associated with the lives of persons important in California's past; (3) it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value; or (4) it has yielded or is likely to yield information important in prehistory or history. The Register includes properties which are listed or have been formally determined to be eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest.

In addition to Rancho Camulos, which is also designated a National Historic Landmark; the following site within the Piru Area of Interest is designated on the State Register of Historic Resources:

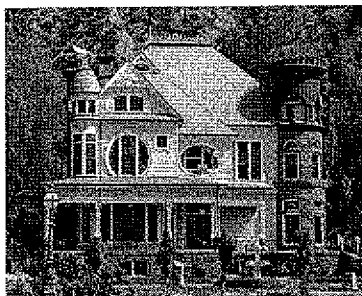
Figure 4.5-2 Portola Market



Warring Park (State Landmark No. 624) - On August 11, 1769, the explorers and priests accompanying Portolá found a populous village of Piru Indians near this point. Carrying their bowstrings loose, the Indians offered necklaces of stones, in exchange for which Portolá presented them with beads. A plaque commemorating this event is located in this community park in Piru. (700 block of Orchard Street, Piru)

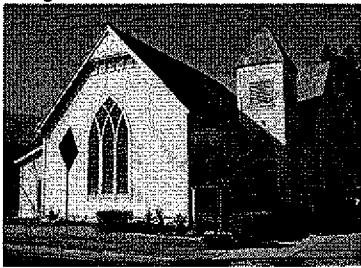
Ventura County Historical Landmarks The Ventura County Cultural Heritage Board was established in 1968 to advise the Board of Supervisors regarding historic landmark designation and preservation. To date the Cultural Heritage Board has designated 156 Historical Landmarks and nine Historical Points of Interest. The following sites are identified by the Ventura County Cultural Heritage Board as Locally Important Historic Landmarks within the Piru Area of Interest:

Figure 4.5-3 Cook Mansion



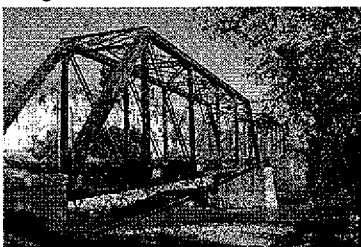
Cook Mansion (County Landmark #4) - Also known as the Warring Mansion or Piru Mansion, this Queen Anne style home was constructed by Piru's founder, David Cook, between 1887-1890. The building was destroyed by a fire in 1981 and has since been reconstructed. The site was designated in 1969. (829 North Park Street, Piru)

Figure 4.5-4 Methodist Church and Organ



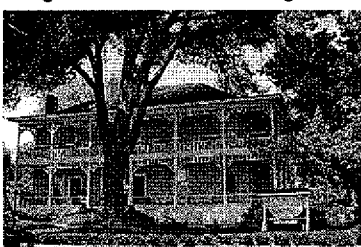
Piru Methodist Church and Organ (County Landmark #51) – This Gothic clapboard church was built between 1887 and 1890 by David Cook, founder of Piru. The 1865 pipe organ was installed in 1935 after surviving the San Francisco earthquake and fire of 1906. (3875 Center Street, Piru)

Figure 4.5-5 Piru Train Bridge



Piru Train Bridge (County Landmark #101) – This steel through-truss railroad bridge was part of the route from Castaic to Ventura that opened in 1886. The rail line is not currently in use. The site was designated as a County Historical Landmark in 1986. (SPRR at Piru Creek)

Figure 4.5-6 Heritage Valley Inn



Piru Hotel (County Landmark #124) - Currently known as the Heritage Valley Inn, this building was built in 1888 for Piru founder David Cook. The site was designated a County Historical Landmark in 1989. (691 North Main Street, Piru)

Figure 4.5-7 Lechler House



Lechler House and Museum (County Landmark #125) - This dwelling was constructed in 1937. Harry Lechler collected thousands of artifacts and operated a museum. The museum no longer exists and the contents were auctioned off in August 2000. The site was designated a County Landmark in 1989. (3886 Market Street, Piru)

Rancho Camulos (County Landmark #152) - This 19th century rancho complex was designated by the County in 1995. This site has subsequently been designated a National Historic Landmark (see discussion of National Landmarks above).

Figure 4.5-8 Sullivan House



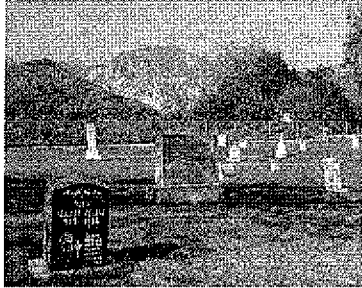
First Church in Piru/Sullivan House (County Landmark #154) – This residence was constructed in 1887. It was originally used as a church and was converted to a school house. It has been a residence since 1919. The site was designated a County Historic Landmark in 1995. (3923 East Center Street, Piru)

Piru Area Plan – In addition to the above sites, the *Piru Area Plan* identifies the following important local landmarks that

"should be preserved where feasible for the benefit of future generations by designation of eligible properties as County Historic Landmarks" (Area Plan policy 1.4.1-1):

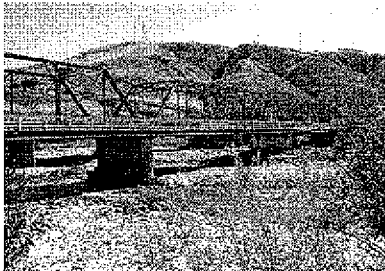
Juan Fustero Historical Marker – Juan José Fustero, a contemporary of David Cook, lived in the Piru-Camulos area. He billed himself as "the last of the Piru Indians." He may have been the last full-blooded Tataviam Indian, although this claim is disputed by some historians. Fustero died on June 30, 1921, at or near Rancho Camulos.

Figure 4.5-9 Piru Cemetery



Piru Cemetery (including the cross above the cemetery) – The cemetery, which dates to the late 19th century, is located about ¼ mile west of the Piru Community. (3580 Center Street)

Figure 4.5-10 Old Center Street Bridge



Old Center Street Bridge – The old Center Street bridge was constructed in 1911. It was left in place when its replacement was constructed in 1985. (Center Street at Piru Creek)

4.5.2 Impacts

Impacts to National, State, and County Historical Landmarks

The adoption of the proposed update to the Piru Area Plan will generally not impact the above described landmarks, except as follows:

Piru Hotel (Heritage Valley Inn): This County Historic Landmark property is currently designated as "Hotel" by the Piru Area Plan. The "Hotel" land use designation limits use of the property to hotels, motels, boarding houses and care facilities.

The proposed Area Plan update includes re-designation of the Heritage Valley Inn from "Hotel" to "Commercial". The purpose of this re-designation is to provide additional flexibility to the property owner by providing more options for the adaptive reuse of this site. Under the proposed "commercial" designation any use allowed by the underlying C-P-D/CBD (Commercial Planned Development, Central Business District Overlay) zoning designation would be permitted, subject to issuance of a Planned Development Permit. In addition to the uses currently permitted, C-P-D zoning would allow a variety of stores, shops, and offices supplying commodities or performing services for the surrounding community. Any change of land use in the C-P-D zone requires approval of a Planned Development (PD) permit. A PD permit is a discretionary entitlement.

In order to approve a PD permit, the Planning Director or Planning Commission must find that the proposed land use will be compatible with surrounding land uses. A PD permit also requires that the design of any exterior improvements would be reviewed for consistency with the Piru Community Design Guidelines. The Design Guidelines are intended to ensure that development is compatible with the historic character of Piru. Discretionary permits within the Piru Area of Interest are also reviewed by the Piru Neighborhood Council. Because of the

landmark status of the Piru Hotel site, any discretionary entitlements regarding this property would also be reviewed by the Cultural Heritage Board.

The CBD overlay zone is intended to help preserve the historic character of buildings and structures. Within the CBD overlay district, a PD permit is required for any alteration of the exterior of the building (including signs). The CPD overlay zoning district also allows certain deviations from parking and landscape standards and sign requirements in order to preserve or re-create the historic character of the district.

Re-zoning of the Heritage Valley Inn site could encourage the property owner to consider land uses not currently allowed in the "Hotel" district. However, given the requirement for a discretionary PD permit, the requirement to comply with the Piru Community Design Guidelines, the requirements of the CBD overlay district, and the requirement for review by both the Piru Neighborhood Council and the Cultural Heritage Board, the likelihood that any exterior design changes would degrade the historic character of this landmark is remote.

It should be noted that the County Historic Landmark designation provides scant protection, as it merely requires the property owners to obtain a Certificate of Appropriateness prior to proceeding with alteration or demolition. However, even if denied, the owner is only stayed for six months during which time the County can try to negotiate a better solution with the owner. Failing this, the owner may proceed after six months.

Piru Cemetery: The cemetery currently occupies approximately one acre of a 2.87-acre parcel. However, because of slope constraints on the balance of the property, the Piru Cemetery has no room for additional graves.

The applicant for the Dana Levy project has offered to re-grade some of the sloped portion of the cemetery property to make additional land available for more graves and provide fill material for the proposed Levy subdivision. No plans have been submitted to date illustrating the proposed re-grading of the cemetery site. The most likely area for re-grading would be the south-central portion of the site which is somewhat less steep and has already experienced some hillside grading at sometime in the past.

Re-grading of adjacent land and expansion of the cemetery would not be expected to have a significant adverse impact on this historic site. However, depending on how the grading is accomplished and how the manufactured slope is treated, potential visual, erosion and geotechnical impacts could occur. These impacts would be expected to be addressed through issuance of a discretionary grading permit (required for any grading that exceeds 1,000 cubic yards for slopes over 34%, or 10,000 cubic yards for slopes over 10%). An existing cross above the cemetery (described in the Piru Area Plan) is not expected to be impacted by grading in that the cross is located on the northern edge of the property in an area of extremely steep slope. Therefore, impacts to this historic cemetery would be less than significant.

Impacts to Historical Structures within the Proposed Piru Expansion Area

There are no designated landmarks within the proposed Piru Expansion Area. However, development of these properties potentially could result in the demolition of several structures with potential historic significance.

John Rieder Project - The John Rieder project site contains an existing single-family dwelling which is proposed to be demolished. The house was originally built for George Maltby around 1911. Mr. Maltby was an orange grower.

The Maltby house is in fair condition and is described as a two-story gabled-roof farmhouse with Colonial Revival influences. The house is roughly rectangular shaped and has a medium pitched roof. Under the eaves are exposed beams and rafters. The front of the house features a covered porch. The windows are double hung casement with wood frames and moldings. The house is covered with narrow clapboard siding.

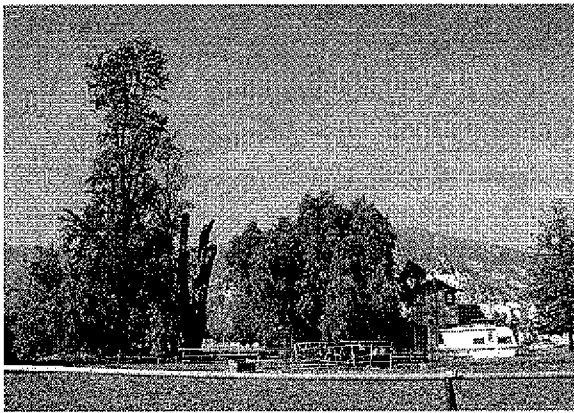
Figure 4.5-11 Maltby House



The house is believed to have been part of the hamlet of Duneden. The town of Duneden was laid out by Robert Dunn around 1904. Apparently Duneden consisted of four houses and a store. The name of the subdivision was an obvious pun on David Cook's nearby "Garden of Eden" Piru. A second residence from the Duneden era is located adjacent to was preserved as part of the Habitat for Humanity tract. A third residence from the Duneden period would be preserved as a remainder parcel of the Dana Levy subdivision.

The house was identified in a cultural heritage survey conducted by the General Services Agency in 1988. The property was re-evaluated by the Ventura County Cultural Resources Board on February 21, 2005. The Cultural Heritage Board determined that loss of this home would have a potentially significant adverse impact with respect to historic resources. Therefore, the proposed destruction of this dwelling is considered a significant adverse impact.

Figure 4.5-12 Trees at Rieder Site



The Cultural Heritage Board Commission further indicated an interest in the trees associated with the Maltby residence. The applicant proposes to remove all of the trees on the property. Trees can be an important element in the context of an historical property. The John Rieder site contains a number of California pepper trees, two silk oak trees, three palm trees and several fruit trees and other smaller trees and shrubs. The trees have not been designated by the County as a landmark or identified on the Federal or California Historic Resources Inventory. Therefore, the trees do not qualify as Historical Trees. However, one of the silk oak

trees (*Grevillea robusta*) is considered a Heritage Tree because it exceeds 90 inches in girth (It is approximate 180 inches in girth). Silk oak trees are not oak trees. They are evergreen trees imported from Australia. The tree is distinguished by comb-like orange-yellow flowers and grows to 100 feet in height. Because of its great size and presumed age, it is clear that the heritage silk oak tree has been associated with this property for a very long time, perhaps from around the time the house was constructed. Heritage Trees are regulated by the County Tree Protection Regulations (Sections 8107-25 et seq.). Loss of this tree is also a potentially significant impact on historical resources. Removal of a Heritage Tree requires issuance of a discretionary tree permit. A second heritage size tree of undetermined species has been infested with beetles and is apparently dead. The other trees on the property appear to be in generally good health.

Figure 4.5-14 Residence on Levy Site

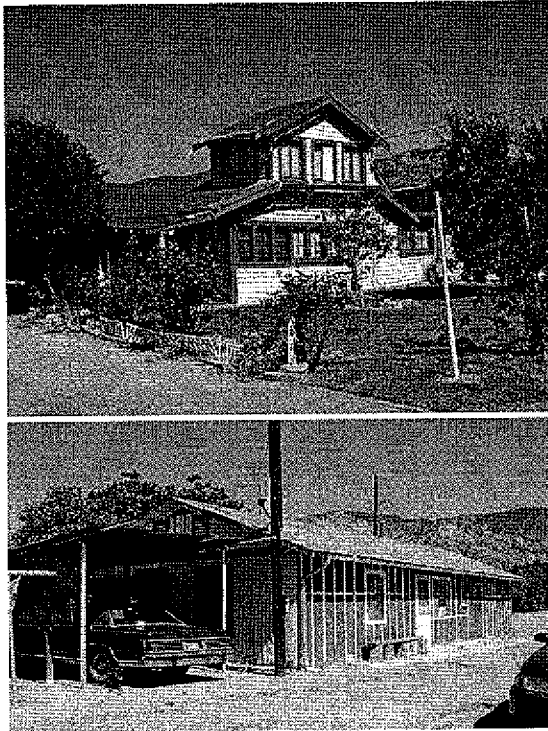


Dana Levy Project: The Dana Levy site has been planted with citrus orchards since approximately 1937. Prior to that date the property was apparently used as a citrus nursery. The site contains a single-story single-family residence which may have been constructed around 1910 as part of the Duneden development discussed above. Other structures on the property include a garage, tool house and tractor shed,

constructed around 1919, and an arbor and covered barbeque area constructed between 1945 and 1950. The house was remodeled around 1930, replacing the original doors, windows and kitchen. The house may have some historical significance as a possible remnant of the Duneden development. However, the house and accessory structures are not identified on any cultural resource survey as a significant structure. In any case, the residence along with the above described accessory structures will be preserved on a half-acre remainder parcel. Therefore, any historic resource impacts would be less than significant.

James Finch Project - The Finch project site contains one farmworker residence which is estimated to have been constructed around 1915. The two-story house is in the craftsman style and appears to be in fair to good condition. A garage associated with the house is believed to have been constructed around 1945.

Figure 4.5-15 Farm House on Finch Site



A second farmworker residence and garage is located in a converted stable believed to have been constructed around 1935.

These structures, while they date back to the early days of the Piru Community, have not been known to be associated with important historical events or lives of persons important in California history and have not been identified as significant historical structures in any survey. However, the Cultural Heritage Board has reviewed these structures and believes these structures may provide a glimpse into early farming in the Piru area and that the 1915 farmworker residence may be worthy of preservation within the proposed development. A project design for the Finch site has not yet been prepared. Thus, the farmworker house could be incorporated into the project design, perhaps as an element of the proposed park.

Figure 4.5-16 Converted Stable on Finch Site

Ventura County Component: No plans have been submitted for development of the balance of the proposed Piru Expansion Area. Future development plans could potentially impact several existing residential structures. These include a residence constructed in 1966 on the Fred Thompson property, a single family dwelling constructed around 1938 on the Roger L. France property, a single-family dwelling constructed in 1967 on the Richard J. and Bonnie Gillmore property, and a single-family dwelling constructed in 1986 and a second dwelling unit (double wide Manufactured unit) constructed in 2002 on the Reynaldo and Donna K. Chessani Reynaldo-Donnak property.

None of these structures have been identified as significant historical structures. Nor are they known to be associated with any important historical events or persons. Therefore, historic resource impacts are expected to be less than significant.

Cumulative Historic Resource Impacts

Much of the Piru Community, as well as outlying areas are developed with structures that are consistent with the historic architecture and character of the existing Piru Community. Discretionary development in commercial areas would be subject to the requirements of the CBD Overlay Zoning

District (described previously) and would be subject to review by the Piru Neighborhood Council and the requirements of the Piru Community Design Guidelines. Likewise, residential development requiring a planned residential development permit would also require review by the Neighborhood Council and would be subject to the Community Design Guidelines. Thus, development subject to discretionary entitlements is less likely to result in significant adverse historical resource impacts.

However, over time, non-discretionary development can result in significant changes to neighborhoods. For example, recent modular residential development along North Main Street is inconsistent with the historic character of this neighborhood. Yet because it consists of single family homes on existing lots, no discretionary review was required. As noted previously, even designated County Landmarks, can be altered or destroyed by non-discretionary development.

Over time, loss of these historical resources and architecturally inappropriate development can diminish the historic fabric of a neighborhood. Such changes may have far-reaching psychological and societal impacts. A sense of historical place and "roots" within the Piru Community may be lost with the cumulative destruction of these resources.

General Plan Historic Resource Policies

The General Plan Cultural Resource goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the exception of the following:

Policy 1.8.2-2 *Discretionary development shall be designed or re-designed to avoid potential impacts to significant [...] cultural resources whenever possible [...]*

Both the Rieder and Finch properties contain potentially significant historical resources. Implementation of the Rieder development as proposed would result in the loss of these onsite resources. No development plans exist for the Finch property as yet, thus it is not known whether these resources will be lost or incorporated into the project design. Thus, as proposed, the Rieder project may be considered to be inconsistent with the above policy, and the Finch project is potentially inconsistent with the above General Plan policy. The recommended measures discussed below would require that the Maltby residence and associated trees on the Rieder property and the 1915 farmworker housing unit on the Finch property be incorporated into the project design. Thus as mitigated, the project would be consistent with the applicable Cultural Resource goals, policies and programs of the County General Plan.

The Piru Area Plan Cultural Resource goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

Policy 1.4.2-3 *Discretionary development shall be encouraged to adopt architectural designs which reflect the historical and cultural traditions of the area.*

The Rieder project proposes an architectural design reflective of the Craftsman style of architecture, which is well represented within the Piru Community. The Levy project utilizes features from the Spanish and Mediterranean style and French Country style. As discussed in Chapter 16 (Community Character), the French Country style does not reflect any of the historical or cultural traditions of the Piru Community and thus the Levy project may be considered to be inconsistent with the above Piru Area Plan policy. However, mitigation measures recommended in the Community Character chapter would require that the French Country design be replaced with an architectural style more reflective of the historical and cultural traditions of the Piru Community. Additionally, the proposed project includes the adoption of residential design guidelines that would encourage development to adopt architectural designs which reflect the historical and cultural traditions of the Piru Community. Thus, with mitigation, as recommended, the project would be consistent with applicable Piru Area Plan Cultural Resource goals, policies and programs.

4.5.3 Mitigation Measures

Potential adverse impacts to historic resources can be mitigated by the following measures:

Recommended Mitigation for Impacts to Historical Structures within the Proposed Piru Expansion Area:

Rieder Component:

- HR-1** The Rieder project shall be re-designed to preserve the Maltby residence at its current location, or relocated to another location if approved. ~~The revised site plan shall be reviewed by the Ventura County Cultural Heritage Board.~~
- Notwithstanding the above, the Maltby residence may nonetheless be ~~relocated or~~ demolished if the applicant prepares a study which demonstrates to the satisfaction of the Ventura County Cultural Heritage Board that the Maltby residence has minimal historical, cultural or architectural significance.
- HR-2** A qualified arborist shall be employed to evaluate all mature trees on the Rieder site. All healthy mature trees, particularly those in the vicinity of the Maltby residence, shall be incorporated into the project design. The Planning Director may authorize destruction or relocation of one or more healthy mature trees if he determines that the removal will result in a superior project design.

Based upon the existing site plan, measures HR-1 and HR-2 could result in the reduction of three to six housing units.

Finch Component:

- HR-3** Any tract map for the Finch component shall be designed to incorporate the existing 1915 farmworker housing unit into the project design.
- If approved by the Cultural Heritage Board, the farmworker house may be relocated to the proposed park to be used as a caretaker residence.
- Notwithstanding the above, the 1915 farmworker residence may nonetheless be demolished if the applicant prepares a study which demonstrates to the satisfaction of the Ventura County Cultural Heritage Board that the farmworker residence has minimal historical, cultural or architectural significance.

Piru Cemetery:

- HR-4** Remanufactured slopes shall not be permitted within 100 feet of the cross above the Piru Cemetery.

A discretionary grading permit is currently required for any substantial grading of the site. (Substantial grading is defined as any grading that exceeds 1,000 cubic yards for slopes over 34%, or 10,000 cubic yards for slopes over 10%).

Recommended Mitigation for Cumulative Impacts on Historic Resources:

- HR-5** Require design review for all exterior alterations, new construction or demolitions within the Piru Community. This could be accomplished ~~by rezoning all of Piru residential areas to "R-P-D", (which would require a Residential Planned Development permit for residential development) or~~ by creating a new design review overlay district for the balance of the community not already in the CBD district.

This measure would make the Piru Community Design Guidelines applicable to all development in Piru. Such a requirement would place a burden on property owners by delaying minor permits which currently can be obtained over the counter, but would now be delayed pending review by a design review body. Because there is no existing design review process for the unincorporated portion of the County, a new process would need to be devised for the Piru Community. It is unknown whether the Board of Supervisors would support development of a design review function for the Piru Community.

4.5.4 Residual Impact

Historical resource impacts by the proposed project would be expected to be less than significant if all identified measures were implemented. Cumulative impacts in the existing community area could be significant if measure HR-5 is found to be infeasible, but would not be impacted by the proposed project. Additionally, implementation of the above recommended measures and those listed in the Community Character chapter would ensure consistency with General Plan policy 1.8.2-2 and Piru Area Plan policy 1.4.2-3

4.6 Scenic Resources—Scenic Highways, Roads, and Features

The Ventura County *Initial Study Assessment Guidelines* define the criteria and methodology for determining whether a proposed project may have a significant adverse impact on scenic resources. Scenic resources are defined as State and County scenic highways and scenic areas/features. A scenic highway is the area visible from a designated or eligible scenic highway, generally within one-half mile of the road. The Countywide General Plan identifies numerous highways within Ventura County that are either designated or eligible for "scenic" status. A scenic area/feature is a physical area or feature that is visually or aesthetically pleasing. Any project that would degrade visual resources or significantly alter or obscure public views meets the threshold for a significant impact on these resources.

4.6.1 Environmental Setting

The community of Piru lies adjacent to Highway 126, which is identified by the County General Plan as an *eligible* State Scenic Highway in the Resources Appendix of the County General Plan. Main Street, Piru Canyon Road and Torrey Road and Guiberson Road are identified by the General Plan as an eligible County Scenic Highways. In addition, the Piru Area Plan designates Highway 126, Main Street, Center Street, Piru Canyon Road, Guiberson Road, and Torrey Road as "Local Scenic Roads."

The visual character of Piru includes a variety of natural resources, public views, and human-made structures. The project area is visible from both Highway 126 and Main Street. Looking north from Highway 126 and Main Street, one sees the mountain ridgelines and rugged canyons that form the backdrop of Piru.

Visible from and adjacent to Highway 126, east of Main Street, are the citrus orchards that currently occupy Levy's proposed project site (Component B). There are several illegal or nonconforming off-site advertising signs located along Highway 126 in this area. North of the Levy site, 850 to 1000 feet distant from the highway, is the existing view of Habitat for Humanity Tract's east wall. Immediately north and adjacent to the Habitat residential tract, the proposed Rieder site (Component A) displays similar views along its eastern edge. Viewing the community west of Main Street from the 126, one sees the existing commercial, residential and industrial development along the highway. In between this development are the views of orchards and other agricultural lands of Finch's proposed project site.

Within the proposed Expansion Area, traveling north along Main Street, the foreground viewshed includes an Arco gas station/mini mart, an open field, citrus orchards, oleander bushes, large trees, several rural homes on large lots, the Southern California Gas Company facility, the cinder block wall of the Habitat for Humanity residential tract, and the Fillmore-Piru Citrus packing plant.

4.6.2 Impacts

Impacts on Highway Views

Highway 126 is an eligible State Scenic Highway and is designated by the Piru Area Plan as a Local Scenic Road.

Development along Highway 126, east of Main Street, would be visible to motorists. The Levy property (Component B), if developed as proposed, would replace the citrus orchard adjacent to the highway with a single-family housing tract (see Figure 4.6-1). The housing tract will eliminate the orchards as a visual resource along Highway 126. The residential structures are two stories in height, the rear elevations (the homes have a rear-yard facing orientation) show little in the way of architectural treatment, and no landscape plans have been submitted to date. The appearance of the homes as described will itself have an impact on public views. In addition, Levy's planned two-story residences closest to the highway will obscure Piru's mountain ridgelines from westbound motorists; indeed, some of the lots are as close as 40' to the northern edge of the highway (see Figure 4.6-2). Furthermore, no landscaping is proposed along the east side of the development which would be prominently visible to westbound motorists on Highway 126. For these reasons, the combined impacts from Levy's project on scenic features and highways are considered significant.

Figure 4.6-1 Citrus Orchard on Hwy 126 (Dana Levy Project Site)

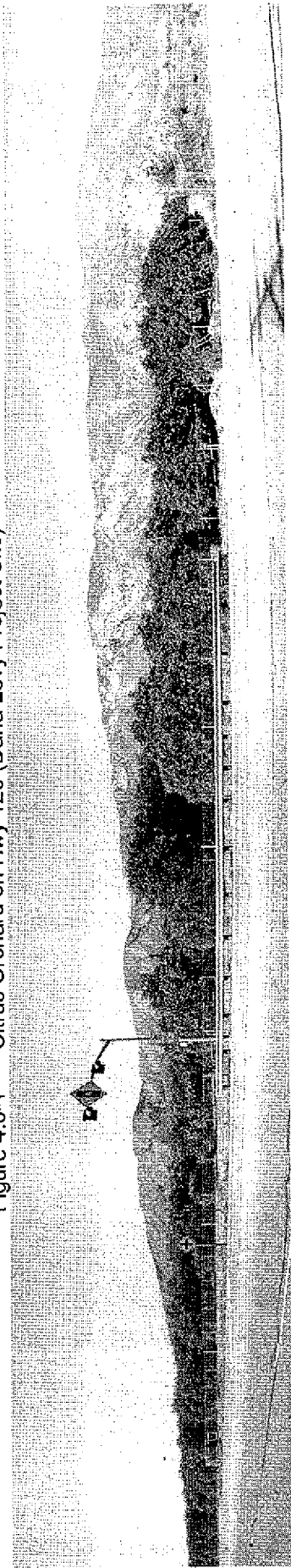
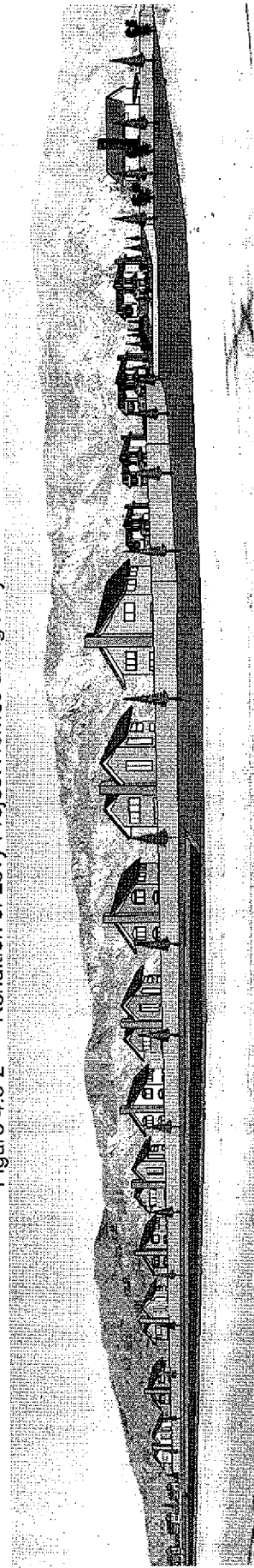


Figure 4.6-2 Rendition of Levy Project Homes along Hwy 126



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Currently, the eastern edge of the Levy site displays views of citrus orchards to travelers heading west along Highway 126 (see Figure 4.6-3). After development, the Component B site plans indicate two story, rear-facing homes with a 6' cinder block wall will be visible to motorists along Highway 126. (see Figure 4.6-4). This change in the viewshed would significantly degrade (i.e., eliminate) the views of citrus orchards. There should be no significant impact to views of the mountains range from this vantage point.

Preliminary landscape plans submitted by Rieder show that the eastern wall of the project will be partially screened from motorists driving on Highway 126. The wall will be partially covered by nine evergreen pear trees and by Boston ivy plant that will be staked and lean to the wall. Furthermore, the project is located at a great distance from the highway, its visible eastern edge is much shorter than Levy's property boundary, and it will be tucked into two existing, minimally visible developments. Thus, project's impacts are considered to be less than significant.

While no tract maps have been submitted for the Component D applicant (County of Ventura), any residential development west of Main Street would be partially blocked from Highway 126 by existing commercial, residential and industrial development along Pacific Avenue and Highway 126. Still, the southeast corner of the Thompson property (County of Ventura Component) along Pacific Avenue is visible for a brief period to travelers heading east or west (see Figure 4.6-5). Any homes developed on the Thompson property would be set back nearly 200 feet from Highway 126; thus reducing the potential for obscuring views of the mountain range (see Figure 4.6-6). For these reasons, there is no significant impact to views of the mountains. Any development of the Thompson property will eliminate the citrus orchards on the site. The future residential units of proposed project could create a perceived impact because it would replace the agricultural and rural scenic resources of orange groves.

Additionally, the existing illegal/nonconforming signs at the northeast corner of Main Street and Hwy 126 are visually detrimental and the gas pressure regulating station adjacent to Main Street will be more visually prominent from Main Street (see Figure 4.6-7).

Impacts on Main Street Views

As indicated above, Main Street is an eligible County Scenic Highway and is designated by the Piru Area Plan as a Local Scenic Road.

The proposed Levy project (Component B) would have several effects on the east side of Main Street. It would eliminate the visual feature of the orchards and replace them with new suburban homes. As the views of the mountains are already obscured, the project would have no additional impacts with respect to views of the mountains from Main Street.

The Southern California Gas Company regulator facility will have impacts to Main Street by retaining an industrial-like visual element to an otherwise suburban and scenic setting (see Figure 4.6-8). The facility already impacts the "view from the road" (i.e., Local Scenic Road of Main Street), though its effects are minimized somewhat by the surrounding orchard and fence that allows less than 50% visibility. Once the proposed housing project is built, this facility would become more visually prominent without the surrounding orchards. Thus, it could be perceived by Main Street motorists and the future residents of the Piru Expansion Area that this utility facility may have a significant visual impact from Main Street.

The Rieder project (Component A) is composed of 60 multi-family units, which will be located on the most northeastern section of Main Street associated with the project. No citrus orchards will be eliminated as there are none on this site. As mentioned above, there are a number of tall, mature, apparently healthy trees associated with the residence on this site (See Figure 4.6-9). The removal of such trees would result in a significant impact on these resources.

An existing single-family home within the Levy site contains several healthy, mature trees. While this home is not currently proposed for destruction, approval of a General Plan amendment allowing increased density may encourage the redevelopment of these properties. (see Figure 4.6-10).

Figure 4.6-3 Eastern View of the Levy Site from Hwy 126

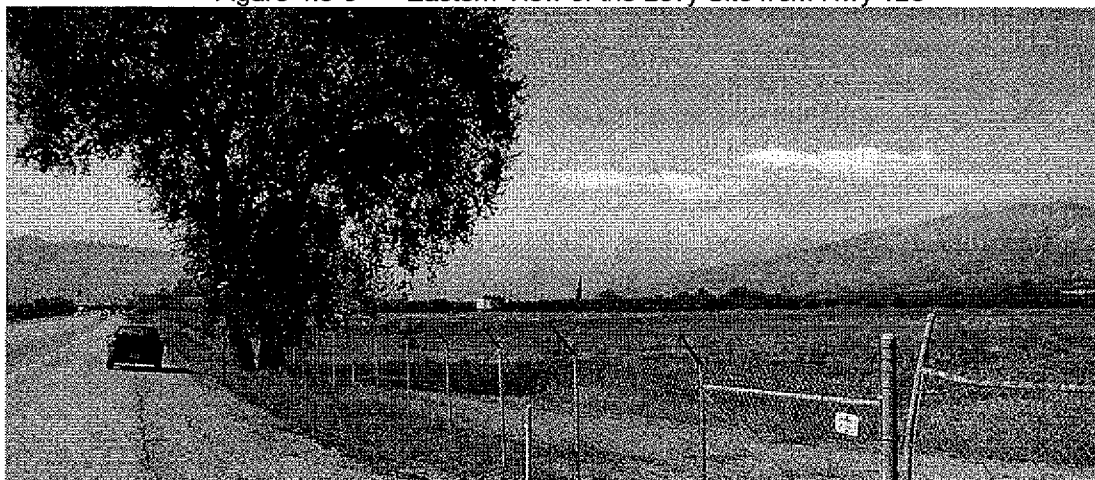


Figure 4.6-4 Rendition of Levy Project from Hwy 126 (east)



Figure 4.6-5 View of Thompson Property from Hwy 126

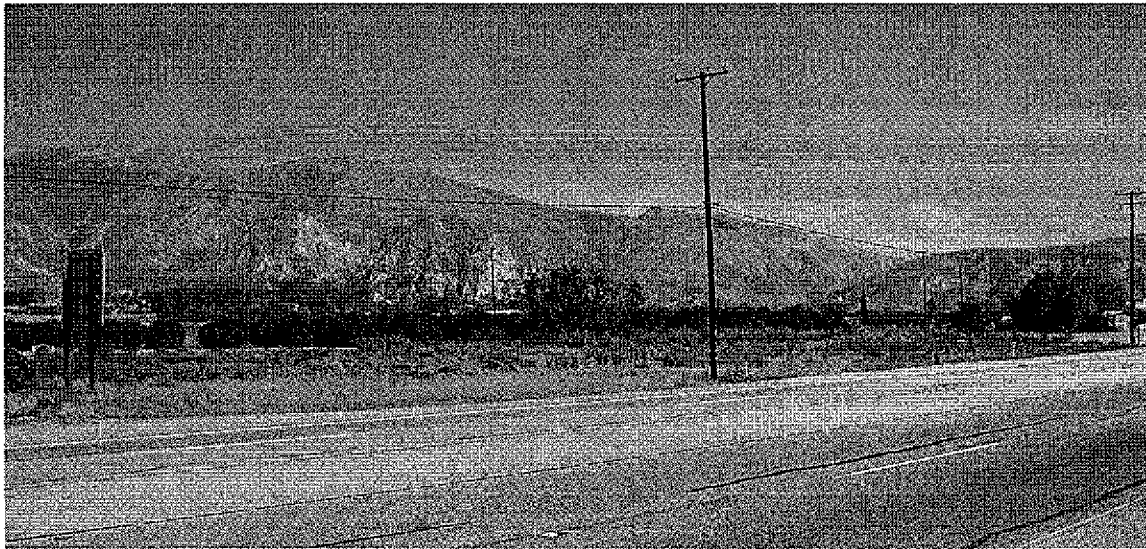


Figure 4.6-6 Rendition of Homes on Thompson Land from Hwy 126

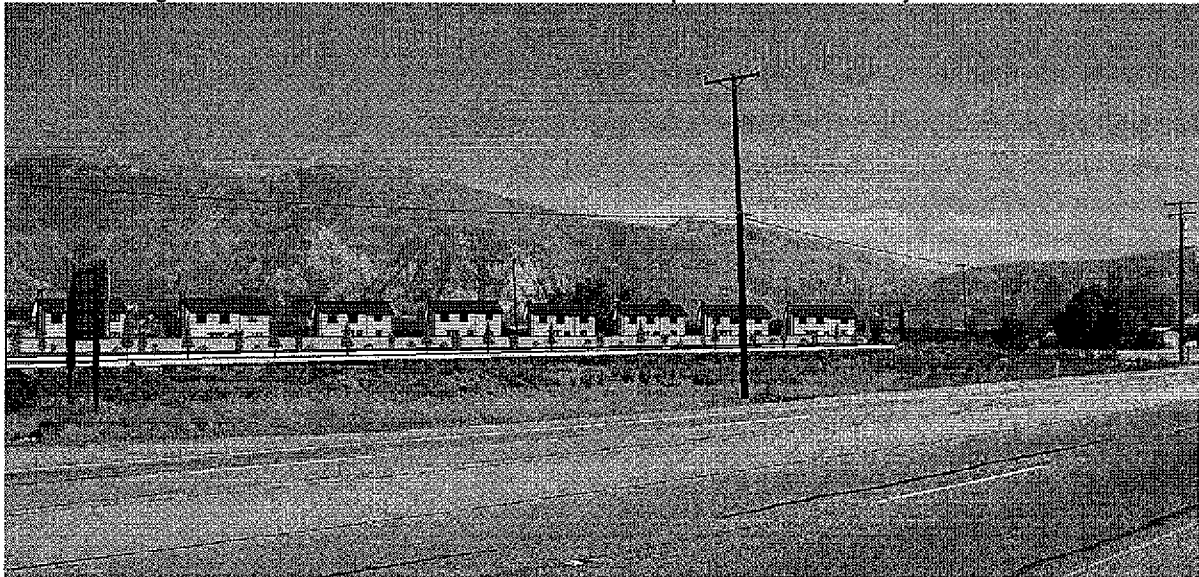
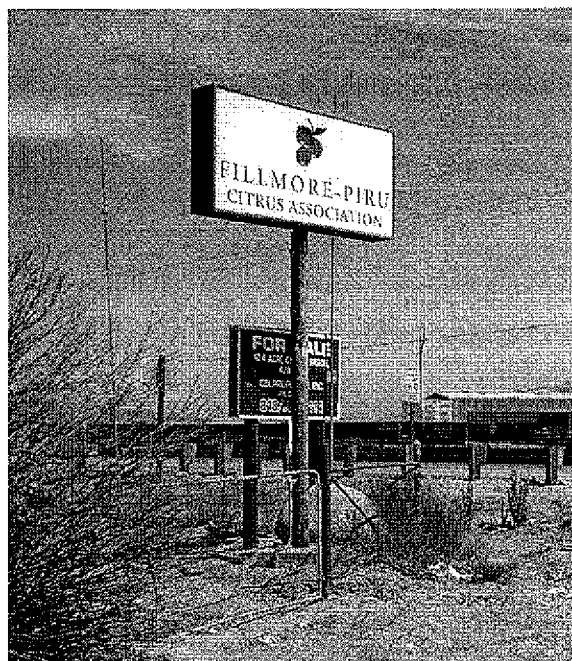


Figure 4.6-7 Signs
Project Site



on Dana Levy

Figure 4.6-8 SC Gas Facility on Main Street

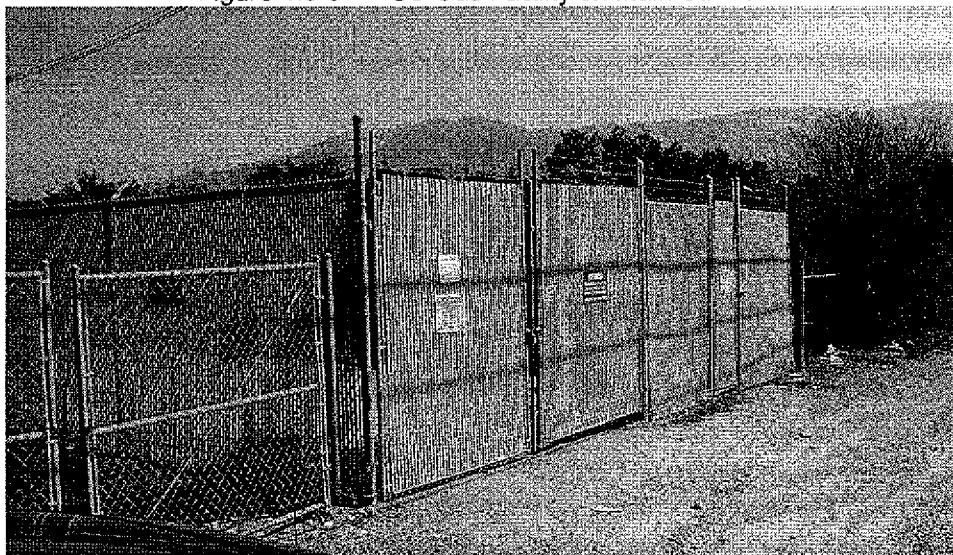


Figure 4.6-9 Mature Trees on Rieder Site

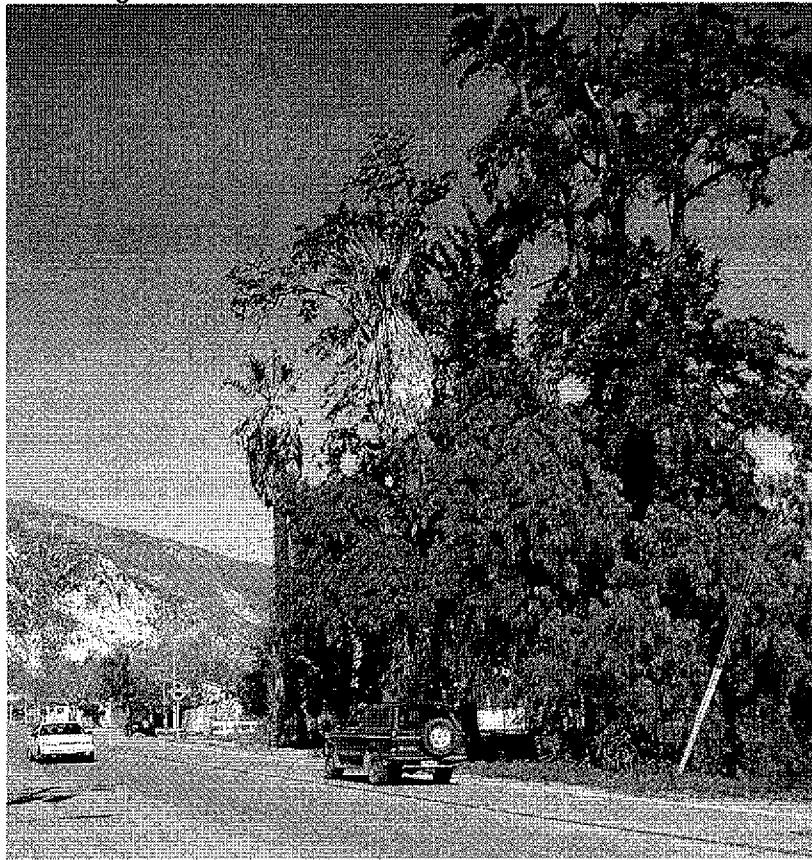
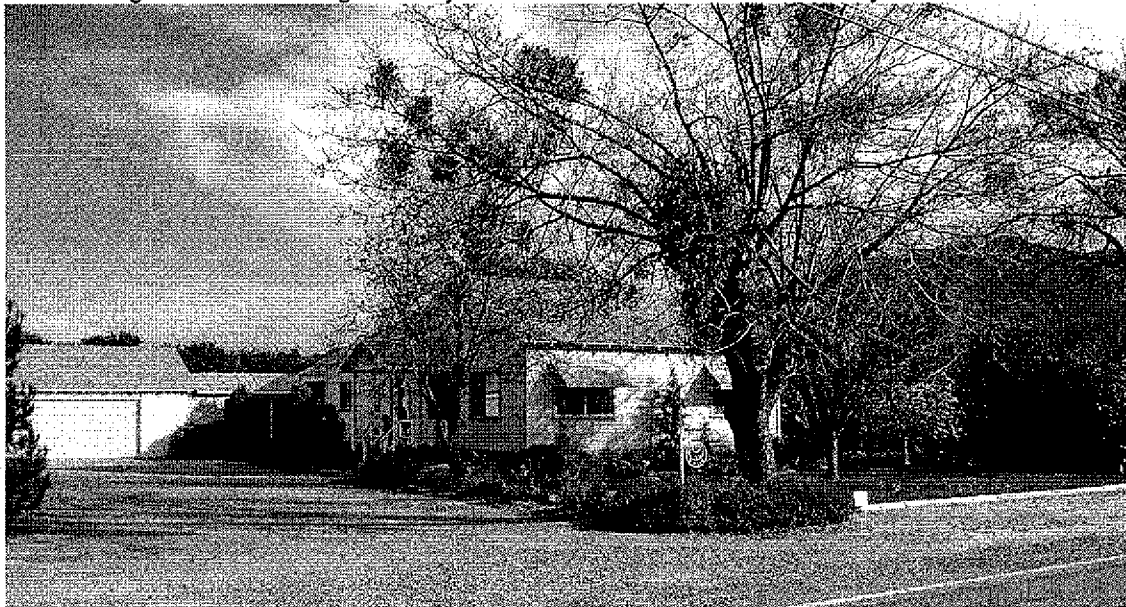


Figure 4.6-10 Single Family Residence & Mature Trees on Levy Site



In regard to the western side of Main Street, no plans have been submitted for either Components C or D. The proposed Finch project (Component C) could have significant visual effects. Homes will

likely be located on the currently open field of the southwestern edge of Main. This could result in a significant altering of views of the mountain ridgelines as one heads north along Main. The development of the central-west area adjacent to Main, (Component D), could result in the removal of apparently healthy, mature trees (see Figure 4.6-11). These trees are located on the three existing residences. Also, Component C homes could significantly degrade the northwestern edge of the scenic road by eliminating the visual resource of the citrus orchards there.

Cumulative Impacts

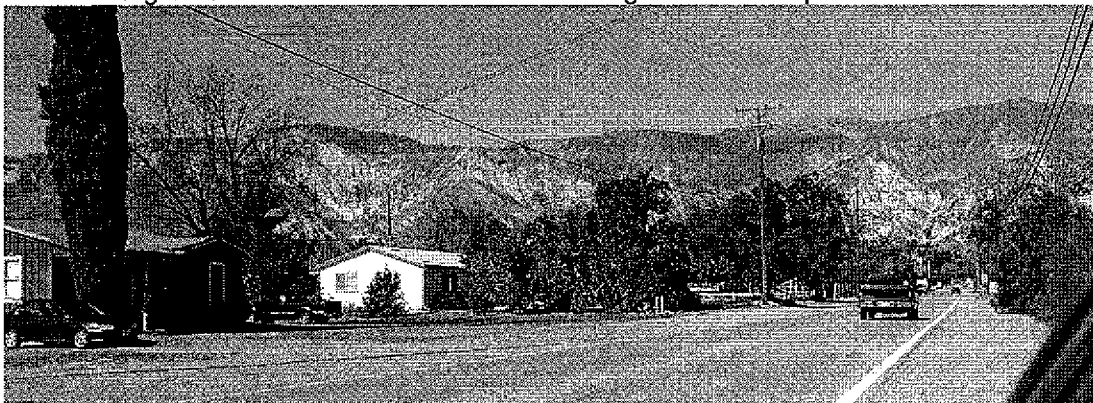
In regard to cumulative impacts within the existing Piru Community, build-out of all the vacant undeveloped residentially-zoned parcels could potentially result in the development of an additional ~~263 176 single-family and 37 multi-family~~ residential units within the Piru Community. There are several of such vacant undeveloped parcels scattered among the community; the largest and most prominent is the Camulos Orchard property (approx. 20 acres) on which 120 housing units (maximum) could be built. Currently the property's citrus orchards that can be seen from Highway 126 soften the transition from rural, open-space into the eastern boundary of the community. Should the Camulos property be developed in the future, the orchards would be degraded (i.e., eliminated) within the viewshed of an eligible scenic highway, resulting in a significant impact.

The Piru area has approximately 12 acres of vacant industrial land. Development of two vacant industrial parcels (APN Nos. 056-0-210-14, -15, totaling almost five acres) directly adjacent to the eligible State-Scenic-Highway 126 could result in a significant visual impact to motorists. While there are no citrus orchards or other exceptional scenic features on these properties; these open areas allow the public to enjoy clear views from the road of the rugged mountains immediately north of the community. The size, type, style, and form of industrial development would determine if and how the public views could be obscured.

In addition, proposed Piru Area Plan policy 3.2.3-2 would allow development of up to 50 multi-family dwelling units within the Commercial Town Center area. This downtown area is already either designated urban or is built as such, thus no scenic resources or features would be degraded. This area is within the view of Center Street, which is also designated as a Local Scenic Road. Existing and proposed Community Design Guidelines would regulate the visual character of any proposed mixed use development within the downtown zone.

If cumulative future build-out does occur, the proposed project will have cumulative significant impacts when considered in combination such development.

Figure 4.6-11 View of Mature Trees along Main on Component D Site



General Plan Scenic Resource Policies

The General Plan Scenic Resource goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the exception of the following:

- Policy 1.7.2-1 Discretionary development which would significantly degrade visual resources or significantly alter or obscure public views of visual resources shall be prohibited unless no feasible mitigation measures are available and the decision-making body determines there are overriding considerations.

The proposed projects have the potential to obscure mountain views from Highway 126 and would replace agricultural views with housing.

Piru Area Plan Scenic Resource Policies

The Piru Area Plan Scenic Resources goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

- Policy 1.3.2-4 State Highway 126, Main Street, Center Street, Piru Canyon Road, Guiberson Road, and Torrey Road, are hereby designated as Local Scenic Roads. Discretionary permits located within view of a Local Scenic Road shall be reviewed for compliance with the following criteria:

- (a) A sign program shall be submitted concurrently with a discretionary permit for all commercial and industrial development. Freestanding off-site advertising signs shall be prohibited. All on-site freestanding signs shall be limited to five feet in height.
- (b) Outside storage shall be landscaped and/or screened from public view.
- (c) Existing healthy, mature trees shall be retained, where feasible.
- (d) Discretionary development shall be designed consistent with the *Piru Community Design Guidelines*.

The Levy site (Component B) contains a number of illegal or nonconforming offsite advertising signs at the northeast corner of Main Street and Hwy 126 (see Figure 4.6-7), apparently in conflict with criteria "a".

The proposed project does not propose outdoor storage, however, the existing Southern California Gas Company regulator facility located on the east side of Main Street within the proposed Piru expansion is an industrial-like appearance that may be perceived in conflict with the intent, if not the language of the criteria "b".

As noted in the Historical Resources chapter, the John Rieder site contains a number of mature, apparently healthy trees (see Figure 4.6-9). One of the trees, a silk oak tree (*Grevillea robusta*), is considered a Heritage Tree because it exceeds 90 inches in girth (It is approximate 180 inches in girth). Removal of these trees may be in conflict with criteria "c". Additional, apparently healthy, mature trees exist in conjunction with existing homes along south Main Street. An existing single-family home within the Levy site and the homes on the west side of Main Street along south Main Street contain several healthy, mature trees. While these homes are not currently proposed for destruction, approval of a General Plan amendment allowing increased density may encourage the redevelopment of these properties. (see Figure 4.6-10 and Figure 4.6-11).

Regarding criteria "d", the existing *Piru Area Plan Community Design Guidelines* do not currently provide any specific requirements for residential development, thus the project is not in conflict with criteria "d". However, the proposed Piru Area Plan Update would establish residential design guidelines (see Appendix 8.3). An analysis of the project's consistency with the proposed Residential Design Guidelines is included in the Community Character chapter.

4.6.3 Mitigation Measures

Mitigation of View from Highway 126:

The Noise chapter of this DEIR discusses the mitigations necessary to reduce the impacts associated with traffic noise from Highway 126. An 11 to 19 foot high sound wall/berm was suggested by an acoustical consultant as a means of reducing the traffic noise along the southern portion of Levy's property. This wall/berm was rejected as a mitigation measure due to its visual and community character impacts. An artist's rendition of such a sound wall/berm is shown in Figure 4.6-12 to illustrate its visual impacts and demonstrate why it is not recommended.

SR-1 (Applicable to the Levy Project Component) In order to mitigate the visual impacts of the project homes from Highway 126, the applicant will meet the following requirements. These requirements are consistent with the Mitigated Community Design Alternative in the Project Alternatives section:

(a) Any residential units placed within 200' 100' of the northern edge of Highway 126 shall be single story, not to exceed 17' in height. This will significantly mitigate the obscuring of the mountain range along the southern edge of the property.

(b) Landscaping shall be required adjacent to the northern edge of the highway in order to replace the visual and aesthetic resource of the orchards lost to development. The landscaping should not exceed 17' (so as to reduce any obstruction of the mountain range) and could be in the form of a vegetative buffer of attractive bushes, shrubs, or trees (such as citrus trees). This landscaped area could be in association with noise-attenuating berms (if necessary) along Highway 126 that would act as both visual and acoustical barriers. Any sound-attenuating walls that are necessary shall be landscaped so as to prevent graffiti and screened from the public right-of-way so that they appear as rural as possible (see Appendix 8.14; Piru Community: Smart Growth & Mixed Use Study). Any proposed sound walls higher than six feet shall be terraced and shall be subject to review by the Piru Neighborhood Council.

(c) A vegetative buffer of trees and/or shrubs (as described above) shall be installed along the eastern edge of the development to improve the view from the highway and compensate for the loss of agricultural views (i.e., citrus trees) lost to the development.

(d) To mitigate the visual impacts of freestanding, off-site advertising signs (which are prohibited) located at the northeast corner of Main Street and Hwy 126, the applicant shall remove subject signs prior to issuance of a Zone Clearance for the project.

See Figure 4.6-13 illustrates how development consistent with Measure SR- 1 might appear.

The acoustical consultant also identified a wall/berm combination to mitigate the traffic noise that would affect the Thompson Property/County of Ventura component along Pacific Avenue. This ten to 14 feet high wall/berm noise mitigation along Pacific Avenue was also rejected due to its visual impacts (see Figure 4.6-14).

SR-2 (Applicable to the Thompson property/County of Ventura Component) In order to mitigate the visual impacts associated with the loss of citrus trees (Thompson property) and their replacement with residential development, applicant will meet the following requirements. These requirements are consistent with the Mitigated Community Design Alternative in the Project Alternatives section:

Any development of the Thompson property shall incorporate trees planted in a parkway along Pacific Avenue between any proposed homes and Highway 126. Trees should be spaced no more than 15' apart and should not exceed a height of 20' so as to minimize any obscuring of the mountain ranges. This would create aesthetic features that should offset the loss of visual resources of orange trees.

See Figure 4.6-15 illustrates how this might appear.

Figure 4.6-12 Rendition of Sound Wall for Levy Site (Hwy 126)

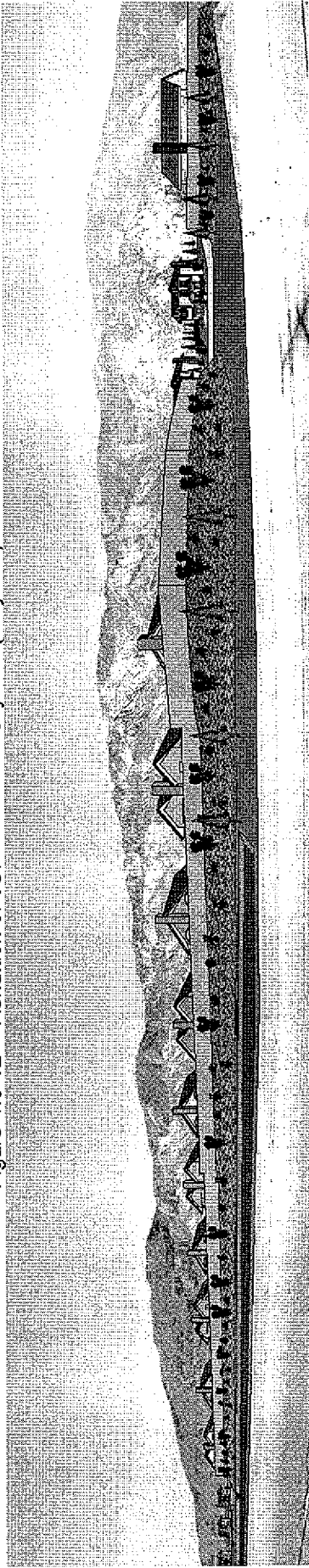
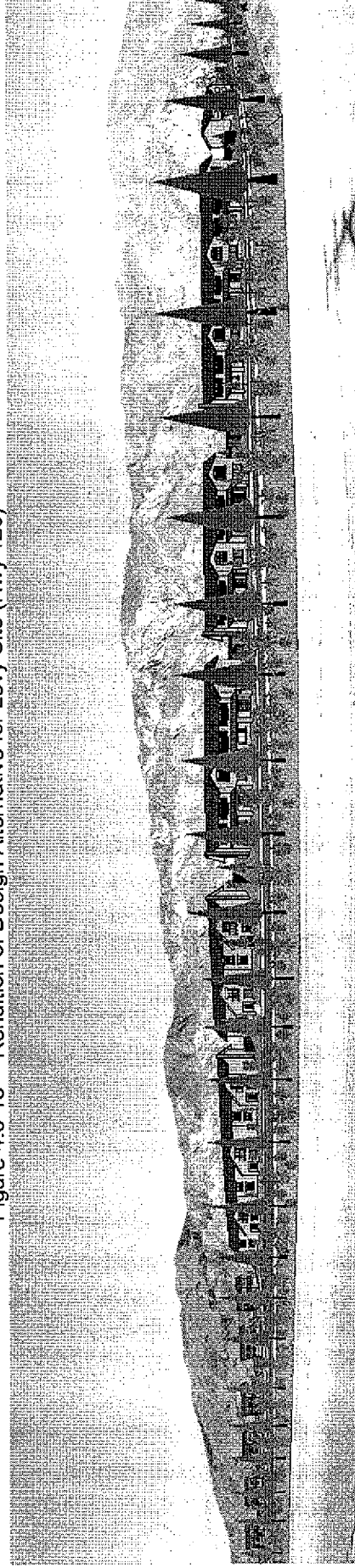


Figure 4.6-13 Rendition of Design Alternative for Levy Site (Hwy 126)



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Figure 4.6-14 Rendition of Sound Wall for Thompson Land (Hwy 126)

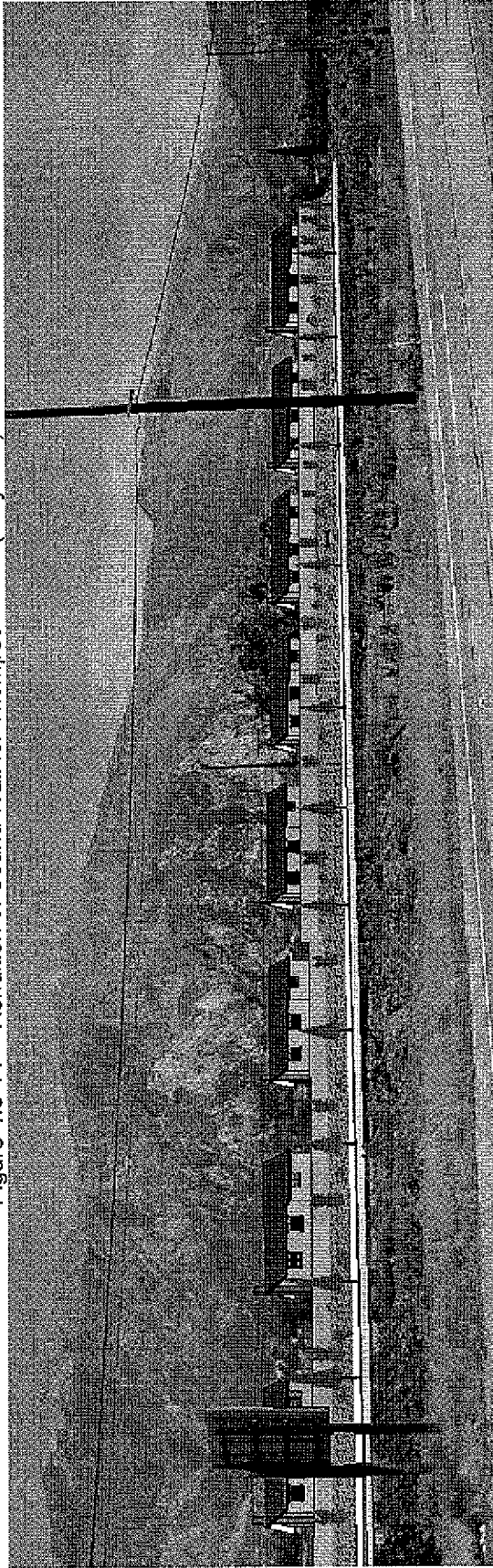
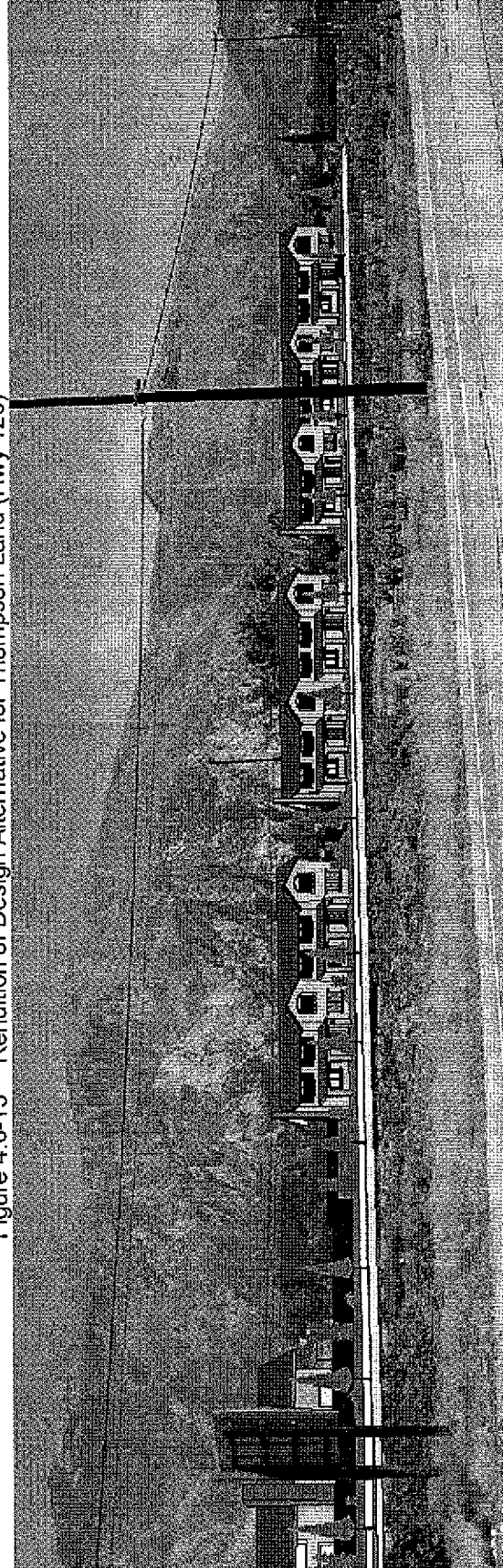


Figure 4.6-15 Rendition of Design Alternative for Thompson Land (Hwy 126)



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Mitigation of the View from Main Street

SR-3 All mature trees shall be surveyed by a qualified arborist prior to recordation of a tract map. Healthy, mature trees shall be incorporated into the project design. However, the Planning Director may authorize destruction or relocation of a healthy mature tree; if the removal will result in a superior project design and if most of the remaining healthy trees are either retained or relocated on site. Removed trees will be offset or replaced in a manner consistent with the Non-Coastal Zoning Ordinance (ZO).

The Zoning Ordinance requires that removed trees be offset by replacement on a "one-for-one", based upon the cross-sectional area of the removed tree, (Sec 8107-25.10). For a complete discussion of tree regulations, see also the County's Tree Protection Guidelines (Section IV, Replacement Trees/Offsets) and the Tree Protection Ordinance.

SR-4 Applicants shall prepare a landscape plan subject to the approval of the Planning Director for the parkways along Main Street. These parkways shall incorporate trees designed to create a canopy over time to shade the pedestrian pathway and soften views of the planned residential development.

SR-5 (Applicable to the Levy project) A landscape plan shall be prepared by the applicant, subject to the approval of the Planning Director, to completely screen the gas regulating station, including fences/walls, from motorists' views from Main Street and the surrounding residential properties. The landscaping shall be permanently maintained by a homeowners association. In the event that the gas regulating station is moved to a location that is not within the residential tract and is not visible from Main Street or Hwy 126, a landscaping plan is not required.

Mitigations SR-4 and SR-5 are consistent with the Enhanced Main Street Concept described in the Community Character chapter (section 4.16.3). Main Street will possess strong aesthetics qualities, a more stately character, and establish a cohesive land use pattern through the implementation of parkways, trees and tree canopies, a landscaped median, and other amenities.

4.6.4 Residual Impact

With the imposition of the above mitigation measures, project impacts will be reduced to less-than-significant. However, cumulative development of the Industrial properties along Highway 126 could obscure mountain views. The above mitigation measures would also avoid potential inconsistency with General Plan Policy 1.7.2-1 and Piru Area Plan Policy 1.3.2-4.

4.7 Flooding, Erosion, and Drainage Facilities

Flooding is an overflow of water onto land that is normally dry. The most common type of flood is the rainstorm-river flood. The area subject to inundation is generally referred to as the flood plain (also known as the "flood zone"). Flooding is a hazard because people find flood plains a desirable place to live and use. Building in flood plains adds to the amount of impervious surfaces, which increases the quantity and flow rates of flood waters. If not properly mitigated, this can increase the risk of flooding and change the course of floodwaters, resulting in altered erosion patterns which can increase erosion processes.

Erosion and siltation consist of the wearing away or deposition of land surface by wind or water. Erosion occurs naturally from weather or runoff, but can be intensified by land clearing practices.

Flood plain management regulations affecting Piru are contained in the Subdivision Ordinance, Building Code, and the Flood Plain Management Ordinance, all of which require that buildings and improvements be protected from flood damage. These regulations are administered by the County Public Works Agency and the Watershed Protection District (WPD).

The County's flood control and drainage facilities are designed for the purpose of providing for the control of floods and storm waters originating within the County's Watershed Protection District or originating outside the District and flowing into it, to conserve such waters for beneficial use, to prevent waste or exportation of waters and to reclaim drainage, storm, and flood waters. The Public Works Agency requires subdividers of land to dispose of drainage water originating within and above their subdivisions that is concentrated by the construction of the subdivision by: (1) conducting the water to the natural water course draining the subdivision; or (2) discharging the water at the edge of their subdivisions and obtaining easements from downstream owners of the land over which the water will flow to the water course. Subdividers are required to construct the above works and such other works as will protect their subdivisions from damage by water and dedicate them to the County or WPD channels.

For the purpose of this analysis, the project's flood control impacts were determined to be significant if the project is located within a 100-year flood zone, if the estimated peak storm flows exiting the development are greater after development or if downstream drainage facilities would be subject to increased erosion damage, or if proposed stormwater detention facilities would result in health or safety impacts for residents.

4.7.1 Environmental Setting

Ventura County enjoys a Mediterranean climate and experiences relatively low annual rainfall totals. However, when the rains do come, they can be torrential and devastating at times, particularly as the rain is often deposited farther upstream in the mountains and the volumes can build as the water runs toward the ocean.

Many of the soils in the County are prone to erosion. One of the side effects of that erosion is added siltation. As the water scours the softer earth, it picks up loose sediments and keeps them in suspension until the water has stopped moving and the sediments are deposited and settle out. Erosion prone areas are not conducive to the development of structures.

The County has a history of flooding problems; damaging floods have occurred every five years, on average, since 1862. The largest and most damaging recorded natural flood in the Santa Clara Watershed occurred in 1969. As a result of this flood, 13 people lost their lives and property damage estimated at \$60 million occurred.

Figure 4.7.1 shows the 100-Year Flood Zone area in the Piru Community. The terms "10 year", "50 year", "100 year" and "500 year" floods are used to describe the estimated probability of a flood event happening in any given year. Their primary use is for determining flood insurance rates in flood hazard areas. Using historic weather and hydrograph data, experts derive the estimated rate of flow or discharge of a river or creek. A 10 year flood has a 10 percent probability of occurring in any given year, a 50 year event a 2% probability, a 100 year event a 1% probability, and a 500 year event a .2%

probability. While unlikely, it is possible to have two 100 year floods within years or months of each other.

In the winter of 2005, heavy rains and storm waters flooded some parts of the Piru Community (affecting mostly the northern, more established section) and some residents were temporarily evacuated. The proposed Piru Expansion Area was not flooded in 2005. Although there was no flooding of the nearby Colina Vista and Citrus View residences, many left their homes as a precautionary measure as the Piru Creek filled with water (but never topped its banks). The Ventura County Public Works Agency has plans for a storm drain improvement project that will add to and increase the size of the drain system on Main, Orchard, and Center streets which should reduce flooding problems in the northern section of town. The proposed storm drain improvements are expected to be completed in 2007. This will reduce the flooding in the more established, northern portion of town. The effects of the 2005 floods and emergency responses to it are discussed in greater detail in Chapter 4.13 (Law Enforcement and Emergency Services).

Piru, along with Fillmore, Santa Paula, East Ventura, El Rio, Oxnard, and Port Hueneme, are all located within the Santa Clara River Watershed (Zone 2). In the unincorporated area of Piru, the WPD exercises regulatory jurisdiction over certain storm drainage detention basins and storm water drainages which are known as "red line" channels. The District manages 181.23 miles of red line channels in Zone 2 (which can either be improved or unimproved). Figure 4.7.2 illustrates the red line channels in the vicinity of Piru.

The storm drain along Main Street and its associated box culvert at Highway 126 is not a red-line channel, but is regulated by County Public Works Agency - Development and Inspection Services Division.

The community of Piru receives an average of 17.36" annually. Component A (Rieder) lies in the northern most portion of the proposed expansion area. This component is at an approximate elevation of 665 feet. Component B (Levy) and Component C (Finch) lie further south and southwest, respectively. The northern portions of these components are at an approximate elevation of 660 feet and their southern portions are at approximately 645 feet. Component D (Ventura County) lies in the southwestern portion of the expansion area. It is at an approximate elevation of 640 feet. The runoff water flow for all four components is generally from a north to south-southwest direction.

4.7.2 Impacts

Project Impacts:

Flooding Impacts

The Reider and Levy projects (Components A and B) will be constructed in the 100-year flood plain area associated with Piru Creek. If not constructed in compliance with flood safety requirements, these Components could be at risk of being impacted by any Piru Creek flooding during a 100-year storm event. This is considered a potentially significant impact.

The Finch and County of Ventura components (Components C and D) are adjacent to, but not within, the 100-year flood zone associated with nearby red line channels. Therefore, the Finch and County of Ventura components will not be significantly impacted by flood hazards.

On-site Drainage Facilities

Component "A" (Rieder's project) contains four proposed on-site stormwater detention basins located between residential buildings.

After reviewing Rieder's tract map information, the WPD determined that the project does not demonstrate that there are adequate drainage detention facilities. Specifically, the project proposal did not demonstrate that it meets the WPD standard requiring that runoff water be contained on site at the pre-development levels and that the water released from the basin(s) be less than the pre-development rate. This is considered a potentially significant impact.

The proposed basins are planned to serve a dual-purpose; they will be used for drainage during and up to 48 hours after storm events and would also be used for recreation when dry. Some communities in California utilize dual purpose detention basins. As an example, the City of Fillmore supports their use. However, a few communities oppose the use of dual purpose detention basins. For instance, the City of Oxnard currently has the policy of not allowing dual purpose basins due to perceived health concerns. The County of Ventura does not have a policy concerning the dual use of water detention basins for recreation and water detention.

Pollutants can enter the detention basins as storm water runs over the land surface and brings with it bacteria, fertilizers, metals, oils, and other pollutants associated with residential development projects. If large amounts of sediments accumulate, heavy metals such as lead, zinc, copper, or other constituents may be a concern and could theoretically become hazardous. When full of water, it is possible that bacteria (coliform bacteria being an indicator) could be present.

The City of Oxnard - Parks and Facilities Division is particularly concerned with body contact with stormwater potentially carrying waterborne pathogens. Paul Tantet of Ventura County Water Resources Division reviewed Oxnard's supporting documentation regarding their ban on dual purpose basins. Mr. Tantet concluded that coliform bacteria and other pollutants would not be significantly threatening to human health when the basin is dry. Melinda Talent of Ventura County Environmental Health Division states that pollutants in dry, residential detention basin should not cause significant health impacts.

The Rieder basins are not intended to be used for recreational purposes when they are full of water. Nonetheless, it is possible for accidental or unintended bodily contact with the basin water during and immediately after storm events (e.g., a child playing in the water of a filled basin). In addition, Rieder's site plans identify two of the four detention basins with all sides sloping at a 5:1 ratio (five units of horizontal distance to every 1 unit of vertical). The City of Fillmore recently required the design of a detention basin (on First Street in the city) to have one of the sides at a 10:1 ratio for easy and safe ingress and egress. Because the two Rieder basins do not have one side with at least a 10:1 slope (the minimum steepness at which access is considered safe), there is a potential public safety concern. For the above reasons, Rieder's proposed dual-purpose basins as designed are considered a potentially significant adverse impact to human health and safety.

In addition, Rieder's dual purpose detention basins, if not maintained properly, could cause adverse impacts related to flooding (if outlet devices become clogged), excessive sediment buildup in the basin, mosquito breeding, overgrown grass and landscaping, eroded vegetation, unsightliness, and health impacts associated with excessive animal feces.

Component "B" (Levy project) proposes a 0.91 acre on-site stormwater detention basin located on the south side of the site and immediately north of Highway 126. In August 2005, Mark Bandurraga, Hydrologist with WPD, reviewed and approved the Levy hydrology study. Therefore, the Levy project complies with the regulations and conditions associated with adequate on-site detention and flow rates prior to building any structures.

The Levy stormwater detention basin is not intended for recreational use. Although the residential lots adjacent to the basin are expected to have fences/walls, no fencing has been proposed around the perimeter of the basin adjacent to Main Street and Highway 126. The basin may be an attractive nuisance to children living in the area. Similar to the Rieder project, the basin, as currently designed, is considered a potentially significant adverse impact to human health and safety during and immediately after storm events.

Component C (James Finch) and Component D (County of Ventura) have not yet had tract maps submitted. These project sites will need to have adequate on-site detention with acceptable capacity and peak flow release rates.

Figure 4.7-1 100-Year Flood Zone

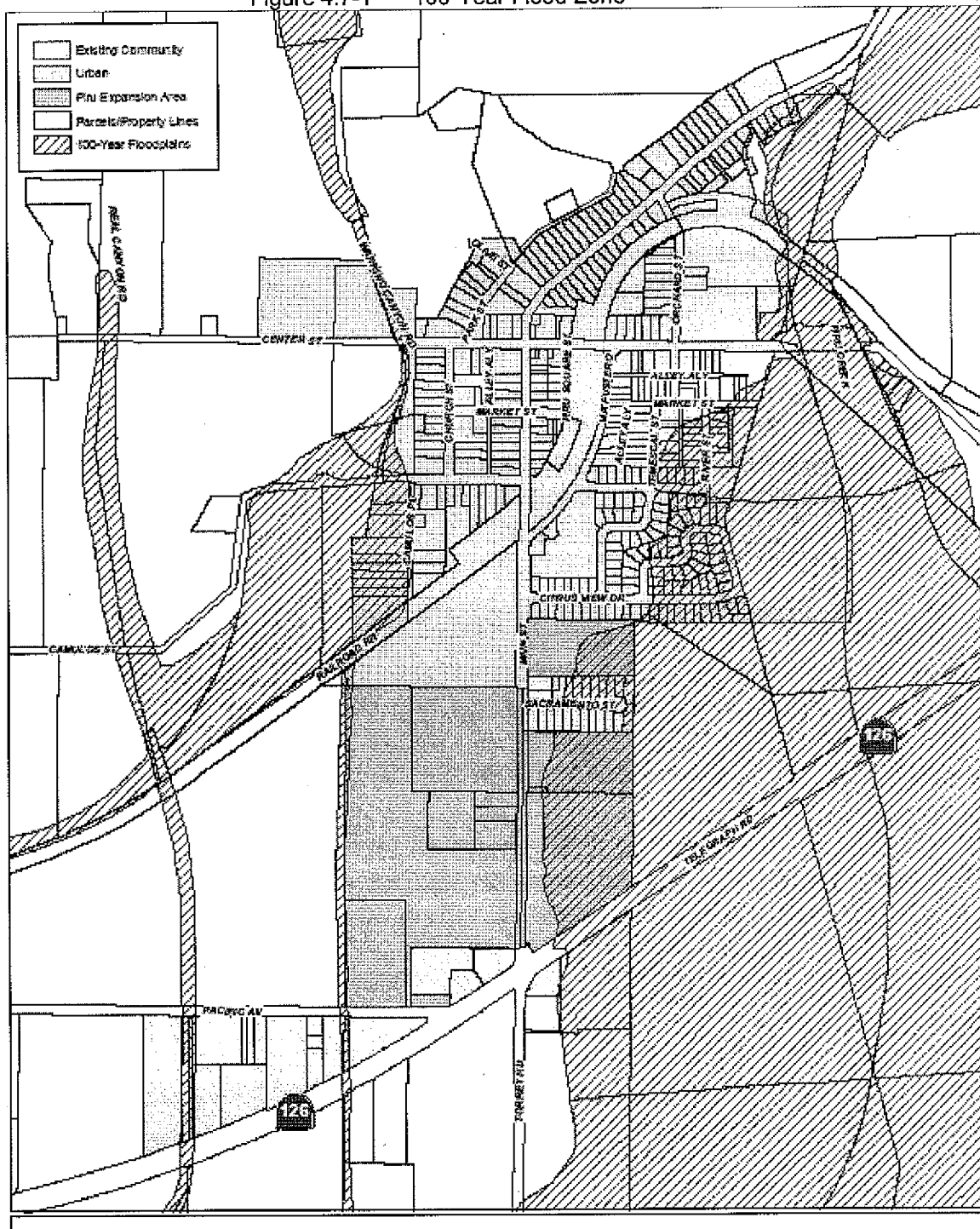
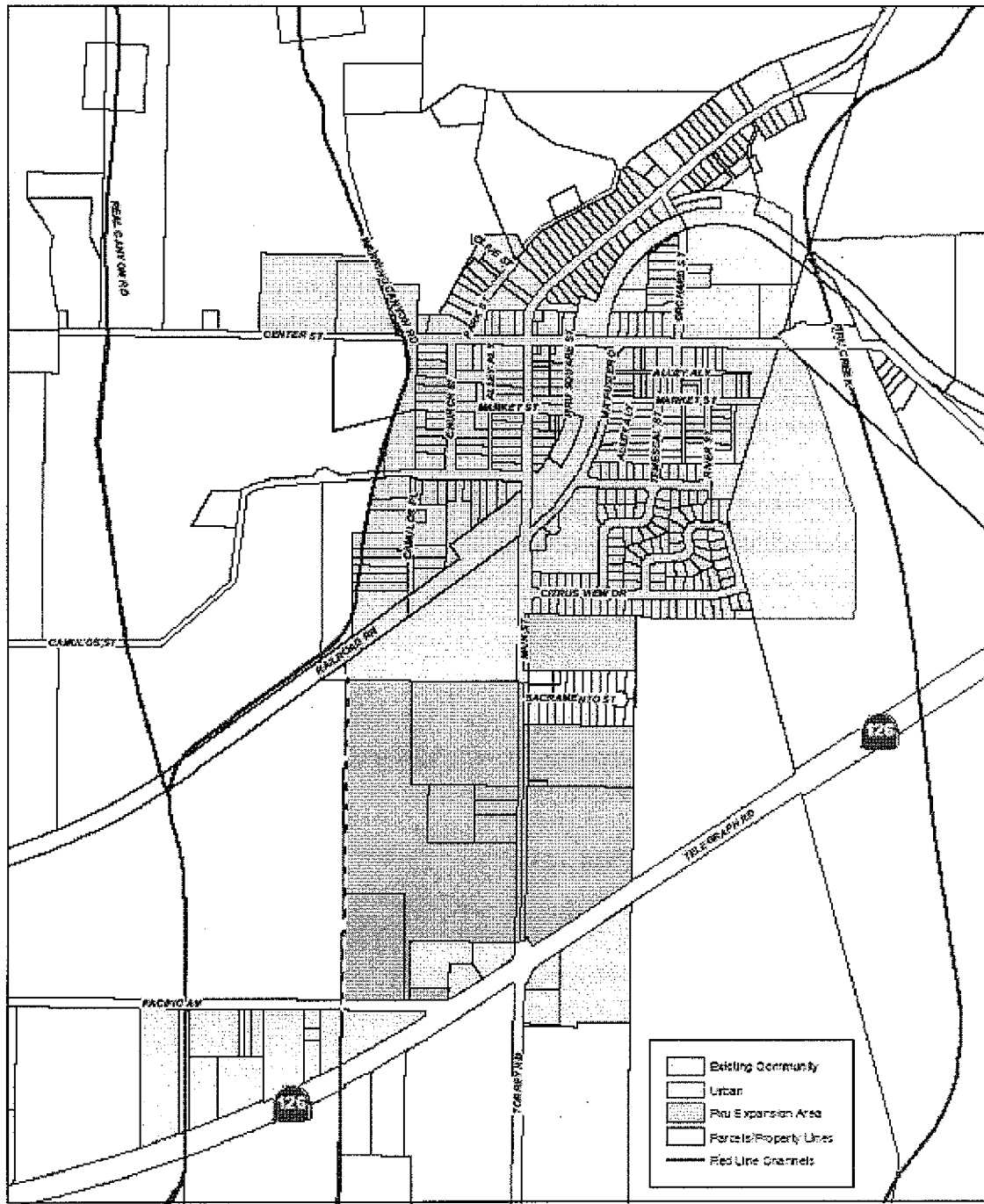


Figure 4.7-2 Red-Line Channels



The topography of most of the land associated with Components C and D generally slopes gradually toward the southwest. The project could be graded to direct stormwater to one or more stormwater detention basins located on the western edge of the project. The western boundary of the Finch and Thompson properties is a WPD Red Line Channel (non-functioning) and the area will be within an agriculture buffer zone (See Chapter 4.4 – Agricultural Resources) in which the detention basin(s) could be placed.

A narrow strip along the eastern fringe of the Finch and County of Ventura components drains to the east. The sheet flow of this area could be captured along the edge of Main Street into a collector drain, from which the water would be directed into the detention basin(s) (mentioned above) located to the west of the project.

The approximate size of a stormwater detention basin for Components C and D combined can be roughly estimated by using Levy's hydrology study which proposes that 5.5% of his project site be devoted to a detention basin. Thus, approximately 2.24 acres ($5.5\% \times 40.76 \text{ Ac} = 2.24$) would need to be devoted to a detention basin that would serve all the properties east of Main Street and south of the Packing Plant. This is only an estimate and a hydrology study from the developer(s) must be provided when the tract maps are submitted.

Depending upon the design, the detention basin(s) for the Finch and County of Ventura components may be an attractive nuisance to children living in the area. This is considered a potentially significant adverse impact to human health and safety during and immediately after storm events unless properly mitigated.

Impacts Associated With Offsite Drainage Facilities

All four project components are located near WPD jurisdictional watercourses (Piru Creek, Warring Wash) and County/Caltrans storm drain systems. Stormwater, sediment or debris from the project could find its way into WPD channels or other facilities. In accordance with the requirements of the Initial Study Guidelines, the evaluation of the drainage facilities must include the condition of the watercourse, the potential velocities of flow within the channel and prospect of erosion of the banks, the possibility of deposition of sediment and debris materials within the channel.

Component A - Rieder's on-site water detention basins will drain into pipes connected to and underneath the Habitat for Humanity project. From here, the pipes connect underground to a catch basin on Main Street (adjacent to Habitat subdivision), and then connect to a 21" to 30" reinforced concrete pipe (RCP) storm drain under Main Street. This storm drain continues under Highway 126, where on the south side of the highway, the water flows out of a box culvert and into the open, dirt ditch along Torrey Road. Here the water is conveyed and finally empties into the Santa Clara River.

After reviewing Rieder's tract map, the Watershed Protection District determined that the project does not demonstrate the project's off-site drainage will be within the maximum capacity of the neighboring Habitat for Humanity subdivision drain (Paul Callaway, WPD, March 2005).

The existing storm drain facilities in Main Street have limited capacity and the runoff from the Rieder's Project may adversely affect the existing storm drain's capacity to maintain sufficient dry lane requirements on Main Street per the County Road Standards for a Q10 event³. In addition, the combination of the runoff from the Rieder project and the limited capacity of the Main Street drain may cause another adverse impact. Because Rieder's project will utilize Habitat for Humanity's connector drain to the Main Street drain, a backwater condition could adversely affect the pads of the Habitat homes when the 21" - 30" drain becomes full.

The extended duration of the flow from the release from the proposed detention basins of the Rieder project after storm events will increase the erosion of the earthen County roadside ditch south of Highway 126. The ditch may not have adequate depth and could potentially result in downstream flooding.

³ A "Q10 event" is the 10 year average recurrence interval storm.

Component B – Levy's hydrology study (8-31-05) indicates that the detention basin will flow into the box culvert on the north side of Highway 126 at Main. The water runs underneath the highway and into an open, earthen ditch (south of Highway 126) that is east and adjacent to Torrey Road.

The extended duration of the flow from the release from the Levy's proposed detention basins during storm events will increase erosion within the County roadside ditch south of Highway 126. The ditch is currently considered inadequate because it is earthen, irregular, several of the corrugated pipe culverts along its path are blocked by dirt and debris, and the ditch becomes increasingly shallow to the point of it disappearing altogether. This could result in further deterioration of the ditch and downstream flooding, resulting in a potentially significant impact.

Component C (James Finch) and Component D (County of Ventura) – These components have not yet had tract maps submitted showing the location of on-site detention basins. The drainage water would most likely flow from the detention basin(s) into Warring Canyon Wash at the box culvert at Pacific Avenue. From there the water would flow through an open ditch, two box culverts, and two small pipe culverts, finally emptying into the Santa Clara River. This segment of Warring Canyon Wash is earthen, with earthen banks, ranging in depth from 7' to 6". Its condition is generally good, except for a few areas of minor erosion. Alan Storey, the owner of the parcel (APN #057001011) next to the wash and box culvert at Highway 126, reports that, during the January 2005 floods, the flood waters remained at a 1.5 feet depth within the wash. As mentioned, the peak storm flow rate from the detention basins should be at pre-developed rates, and thus the wash should be able to accommodate the volume of flow. But, the release may result in longer periods of flow into this earthen wash. The erosive effects of long term drainage could damage this wash. If Warring Canyon Wash is used for offsite drainage, there may be a potentially significant adverse impact on this District channel.

Cumulative Impacts

Build out of the approximately 3.5 acres of vacant commercial land and 12 acres of vacant industrial land could potentially accommodate approximately 20,000 square feet of commercial space and 104,000 square feet of industrial floor area. This potential development could create additional offsite drainage into the ditches on Torrey Road and Warring Wash. This could contribute to the significant impacts to capacity and erosion of these facilities.

Relevant Plans and Policies

Flooding

The General Plan (Goals, Policies and Programs), Hazards Appendix, County Flood Plain Management Ordinance, and Piru Area Plan related to flood hazards were all reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant policies and ordinances, with the exception of the following:

The Goals, Policies and Programs contain the following policy:

- | | |
|-----------------|---|
| Policy 2.10.2-4 | <i>The design of any structures which are constructed in a flood plain...shall be governed by Federal regulations as well as the County Flood Plain Management Ordinance and shall incorporate measures to reduce flood damage to the structure and to eliminate any increased potential flood hazard in the general area due to such construction.</i> |
| Policy 5.2.1-1 | <i>RESIDENTIAL CONSTRUCTION – New construction...of any residential structure shall have the lowest floor, including basement, elevated to one (1) foot above the base flood elevation...</i> |
| Policy 5.2.1-2 | <i>Shall have the elevation of the lowest floor certified by a person qualified in the State of California to practice surveying. Such certification shall be provided to the Director of Public Works a form prescribed by the Director of Public Works. The certification shall be provided prior to occupancy of the structure.</i> |

The Piru Area Plan contains the following policy:

Policy 2.2.2-3 Discretionary development outside the floodway but within the 100-year floodplain (Flood Fringe area) as designated on the Flood Insurance Rate Maps prepared for the United States Department of Housing and Urban Development's Federal Insurance Administration, shall be permitted only if it can be shown through engineering analysis that such areas will be protected from a 100-year flood.

Both the Rieder and Levy projects lie in the floodplain, yet neither have submitted plans, certification, or studies demonstrating that the all units meet these requirements. If the projects follow the recommended mitigation measures discussed below, they would be consistent with the applicable policies and ordinances discussed here.

Drainage

The Flood Control and Drainage Facilities chapter (4.6) of the General Plan (*Goals, Policies and Programs*) was reviewed for its applicability to the proposed project. The project was determined to be consistent with the relevant plans and policies, with the exception of the following:

Policy 4.6.2-2 *Discretionary development shall be conditioned to provide flood control and drainage facilities deemed by the Public Works Agency and Flood Control District as necessary for the development, and shall be required to contribute toward flood control facilities necessitated by cumulative development.*

The recommended measures discussed below would make the project consistent with applicable Flood Control and Drainage Facilities goals, policies and programs of the County General Plan.

4.7.3 Mitigation Measures

Mitigation for Flooding Impacts (Applicable to Reider and Levy Components Only):

FC-1 Prior to recordation of tract maps, the Levy and Rieder developers shall apply to the Federal Emergency Management Agency (FEMA) ~~for a and obtain a~~ Conditional Letter of Map Revision (CLOMR). Prior to issuance of a Certificate of Occupancy for the first residential unit on either the Levy and/or Rieder projects, the developers shall obtain a Letter of Map Revision (LOMR) from FEMA.

Obtaining LOMR approval requires that the developer meet specific standards (i.e., establish higher elevations for the project, provide necessary grading, have adequate plans that include flood plain designations, etc.). Once the plans are approved by FEMA, the proposed project will be subject to conditioning by WPD as a part of WPD's Flood Control Permitting process.

Mitigation for Impacts Related to Detention Basins:

FC-2 To reduce impacts associated with proposed detention basins, the following shall be required:

- a) Prior to recordation of the final tract map, adequate onsite detention shall be demonstrated to the satisfaction of the WPD and PWA. WPD's standard is that the developed site can release no more runoff in any storm event than the un-developed site currently releases in the same type of storm event; and that on-site detention should be developed to contain the runoff from the 10 year storm to the 100 year storm volume with release of this runoff volume at no more the pre-development 10 year peak storm runoff rate. The required detention basin(s) must be completed according to WPD's standards and must be ready for operation before granting occupancy permits. (Paul Callaway, WPD, March and August 2005).
- b) In order to prevent human contact with the standing water, public signs shall be posted warning of potential health risk during times when the basin has standing water.

- c) In order to prevent standing-water situations that increase the potential for mosquito breeding, all detention basins shall drain completely within 48 hours of a Q100 storm event.
- d) All detention basins shall incorporate Best Management Practices (per NPDES standards) for storm water quality purposes to reduce or eliminate contaminants and trash from entering into the public storm drain system, including the Main Street drainage (if applicable).
- e) Water detention basins shall be maintained in the following manner:
 - Inlet and outlet devices shall be routinely cleaned.
 - Sediments shall be periodically removed.
 - The basins shall remain clear of debris and trash
 - All landscaping shall be maintained. Any erosion shall be re-vegetated.
 - All detention basins shall be maintained by a Home Owner's Association ~~or by an Assessment District that is created by the developers for that purpose.~~ In order to ensure proper maintenance of the basin, public signs will be posted in which the telephone number(s) of the HOA and the proper county agency will be listed. This will enable the public to make requests or complaints regarding maintenance issues.
- f) If the basin is designed for both water detention and recreation, the following additional measures shall be complied with:
 - If children's play equipment is to be included ~~in placed near~~ placed near these basins, then it shall be placed above the maximum water line ~~to ensure children's safety and outside the depression area of the basin.~~ If any fence/barrier and gate are required due to the basin's design (see below), then play equipment must be placed outside of such fencing/gating. The maximum water line should be based on the amount of stormwater detained that is the difference between Q10 and Q100 storm events (with a pre-development Q10 peak storm release rate).
 - To prevent excessive bacteria-causing animal feces, vending machines with plastic baggies shall be made available and public signs posted encouraging people to clean up after their pets.
 - To address potential public safety impacts, any detention basin that will contain water at a depth of 18 inches or more must be separated from the public by a five foot high, fence/barrier (climbing resistant—see below for further explanation) and a gate that shall be closed during the presence of standing water. the Detention basins that will contain standing water at a depth of less than 18 inches shall be designed to be no steeper than 10:1 on at least one side and shall have all other slopes no steeper than 5:1 if there is no perimeter fence/barrier and bush/shrub landscaping ~~exists;~~ for any slopes greater than 5:1, a perimeter fence/barrier (climbing resistant—see below) shall be installed to prevent public access through such slopes, and shall be landscaped by bushes and shrubs in order to discourage people from coming inside the fence and/or walking along the edge the basin.
- g) Any single-purpose (non-recreational) or dual-purpose (recreational) detention basin that contains water at a depth of 18 inches or more shall be surrounded by a fence/barrier consistent with the outdoor swimming pool standards of the Ventura County Building Code and County Zoning Ordinance.
The following requirements are designed to ensure that the fence/barrier is climbing resistant, improves safety, and ensures suitable aesthetics:
 - The top of the barrier shall be at least 60 inches above grade.
 - The maximum vertical clearance between grade and the bottom of the barrier shall be 2 inches. The maximum vertical clearance shall be 4 inches when grade is a solid surface (such as a concrete deck).

- Any decorative design work on the side away from the basin such as protrusions, indentations or cutouts, which render the barrier easily climbable, is prohibited.
- Spacing of the vertical, wrought-iron style bars shall be a minimum of 1¼ inches and a maximum of 4 inches and the distance between the horizontal members shall be 45 inches or more. The wrought-iron style bars shall be iron, metal, or other sturdy, long-lasting material.
- Any gate that is installed shall be self-closing, self-latching, and include lockable hardware.

Mitigation of Off-site Drainage Impacts (Applicable to Rieder Component Only)

FC-3 Applicable to Rieder Component only: Prior to recordation of the final tract map for the Rieder Component, the developer's engineer shall demonstrate to the satisfaction of the PWA that the flow discharge from the proposed development does not adversely affect the existing 21" RCP and 30" RCP storm drain facilities (which have limited capacity) in Main Street per the County Road Standards for a Q10 event and does not adversely affect the ability for Habitat Humanity project to drain to these storm drains as originally designed. In addition, it will have to be demonstrated that the undeveloped flow discharge from the proposed development does not adversely affect the existing drain's capacity to maintain sufficient dry lane requirements on Main Street per County Road Standards for a Q10 event.

As mentioned, potential adverse impacts from the project could result in excessive flooding on Main Street. In addition, the adjacent, existing Habitat for Humanity development could be adversely affected. If the storm drains become full, the pads of the Habitat homes could be jeopardized by a backwater condition.

FC-4 Prior to recordation of the final tract map for any project in the Piru Expansion Area, the developer's engineer shall prepare and submit a hydrologic report to PWA demonstrating that the unimproved earth-lined ditches/washes south of Highway 126 and north of the Santa Clara River have adequate capacity to accommodate the proposed development's flow rates and that the duration of flow will not adversely erode the ditches/washes or cause downstream flooding. If the ditches/washes have no additional capacity or increased erosion will result, the developer's engineer shall prepare a plan to improve the affected facilities from Highway 126 to the Santa Clara River in a manner acceptable to the Director of Public Works.

Unless otherwise agreed upon by County and the developers, the fair share cost of this mitigation shall be allocated based upon acreage within each project component that utilizes the same ditch/wash. (Component A: 5 ac. = 12.78%, Component B: 16.5 ac. = 26.5%, Component C: 32.8 ac. = 52.69%, and Component D: 7.96 ac. = 12.78%).

As discussed in Chapter 4.3 (Biological Resources) no riparian or wetland resources were identified in the ditch. Thus, any improvements to the ditch should not create a significant biological impact.

Mitigation for Cumulative Impacts to Offsite Drainage Facilities

FC-5 As discussed in the cumulative impact section, the undeveloped commercial and industrial lands could create additional offsite drainage into the ditches on Torrey Road and Warring Canyon Wash. This could result in significant impacts to capacity and erosion of these facilities. As such, measure FC-4 should be imposed on any discretionary development that may occur on these commercial/industrial properties as well.

4.6.4 Residual Impact

With the imposition of the above mitigation measures, the impacts will be reduced to a less-than-significant level.

4.8 Noise

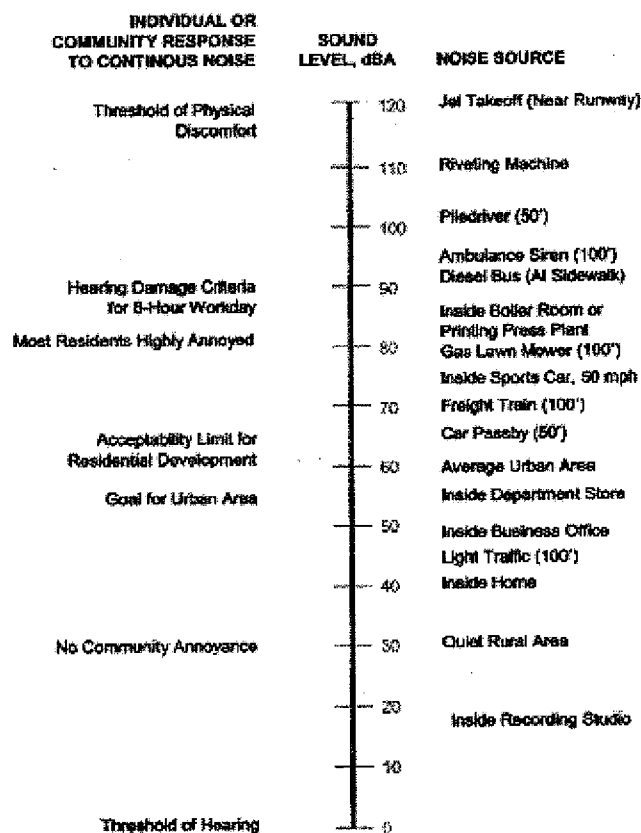
This chapter addresses noise generated by proposed project construction, the proposed park and noise impacts to the project caused by traffic, adjacent agricultural and industrial operations and the Southern California Gas Company metering station.

This chapter was prepared based upon noise impact assessments prepared by Advanced Engineering Acoustics, dated September 10 and December 15, 2005 and a supplementary noise analysis of the FPCA packing plant operations conducted on August 30-31, 2006.

Noise is defined as unwanted sound and as such it is perceived subjectively by each individual. Acceptance of a certain type of noise or noise level varies among neighborhoods, individuals, and time of day.

People are subject to a multitude of sounds in the urban environment. Typical noise levels of indoor/outdoor environments and public response to these sounds are shown in Figure 4.8.1. Many of these sounds are by-products of desirable and necessary day-to-day activities. However, some sounds such as the thunder of jet aircraft and the roar of automobiles are perceived as undesirable. Excessive noise can not only be undesirable but may also cause physical and/or psychological damage. The amount of annoyance or damage caused by noise is dependent primarily upon three factors – the amount and nature of the noise, the amount of ambient noise present before the intruding noise and the activity of the person working or living in the noise source area.

Figure 4.8.1 Typical Sound Levels of Noise Sources and Expected Reactions



Physically, sound pressure magnitude or amplitude is measured and quantified in terms of a logarithmic scale in units of decibels, abbreviated dB. The subjective manifestation of amplitude is loudness. Research on human sensitivity to noise has shown that a 3 dB increase in the sound level is barely noticeable, a 5 dB increase is clearly noticeable and a 10 dB increase would be perceived as being twice as loud.

Sounds heard in the everyday environment usually consist of a range of frequencies or pitches at different levels. Human hearing is not equally sensitive to sound in all frequencies. A frequency-dependent adjustment, called A-weighting, has been devised so that sound may be measured in a manner similar to the way the human hearing system responds. That is, it's a method of measuring sound that de-emphasizes the very low and very high frequencies. The A-weighted sound level decibel is abbreviated "dB(A)." It is adequate for describing noise for a particular instant in time at a particular location. Resulting A-weighted sound levels provide the generally accepted descriptor for traffic noise.

The maximum instantaneous noise level (L_{max}) is the maximum level of noise measured during a given measurement period.

However, the average level of environmental noise fluctuates with time so that the A-weighted level of background noise changes with the cycle of human activities. The sound level descriptor used in this report is the hourly energy equivalent sound level (L_{eq}). L_{eq} is defined as the continuous A-weighted sound level that, in a specified period of time, contains the same sound energy as the actual time-varying sound during that period. That is, it's an average sound level for a given period of time. It is typically computed over 15-20 minutes, 1-hour, 8-hour, or a 24-hour sample period. It is a particularly stable and predictable description of traffic noise and, at the same time, is well-correlated to people's reactions to noise.

Another sound level descriptor is the energy average community noise equivalent level (CNEL) which is a 24-hour, time-weighted average noise level. It is composed of the 24-hourly equivalent energy average sound levels (L_{eq}) with an additional 5 dB added to evening noise levels between 7 p.m. and 10 p.m. and 10 dB added to the nighttime hourly noise levels between 10 p.m. and 7 a.m. Unless otherwise noted, the sound levels in this report are CNEL.

It should be noted that noise levels diminish, or attenuate, as distance from the source increases, following an inverse square rule, but the rate of attenuation varies with the type of sound source. Sound attenuates from a point noise source, such as an industrial facility (e.g., the Fillmore-Piru Citrus Association packing plant), at a rate of 6 dB per doubling of distance. Heavily traveled roads with few gaps in traffic (i.e., State Highway 126) behave as a continuous line source with an attenuation rate of 3 dB per doubling of distance. However, most traffic conditions for local roads (i.e., Main Street) have noticeable gaps between vehicles and the attenuation rate is 4.5 dB per doubling of distance.

The County of Ventura has established the following noise threshold criteria in the current Initial Study Assessment Guidelines:

"Noise sensitive uses⁴ proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that:

- a. Indoor noise levels in habitable rooms do not exceed CNEL 45.*
- b. Outdoor noise levels do not exceed CNEL 60 or L_{eq} (1hr) of 65 dB(A) during any hour."*

Additionally, construction noise is to be evaluated and, if necessary, mitigated in accordance with the County-adopted Construction Noise Threshold Criteria and Control Measures. This document requires that construction shall adhere to the threshold criteria shown in Figure 4.8.2

⁴ Noise Sensitive Uses are defined as dwellings, schools, hospitals, nursing homes, churches and libraries.

Figure 4.8.2 Daytime Construction Activity Noise Threshold Criteria

Construction Duration Affecting Noise-Sensitive Receptors	Noise Threshold Criteria ¹	
	Fixed Leq(h), dB(A)	Hourly Equivalent Noise Level (L _{eq}), dB(A) ^{2,3}
0 to 3 days	75	Ambient L _{eq} (h) + 3 dB
4 to 7 days	70	Ambient L _{eq} (h) + 3 dB
1 to 2 weeks	65	Ambient L _{eq} (h) + 3 dB
2 to 8 weeks	60	Ambient L _{eq} (h) + 3 dB
Longer than 8 weeks	55	Ambient L _{eq} (h) + 3 dB

Note 1: The noise threshold criteria shall be the greater of these noise levels at the nearest receptor area or 10 feet from the nearest noise-sensitive building

Note 2: The instantaneous L_{max} shall not exceed the noise threshold criteria by 20 dB(A) more than 8 times per daytime hour.

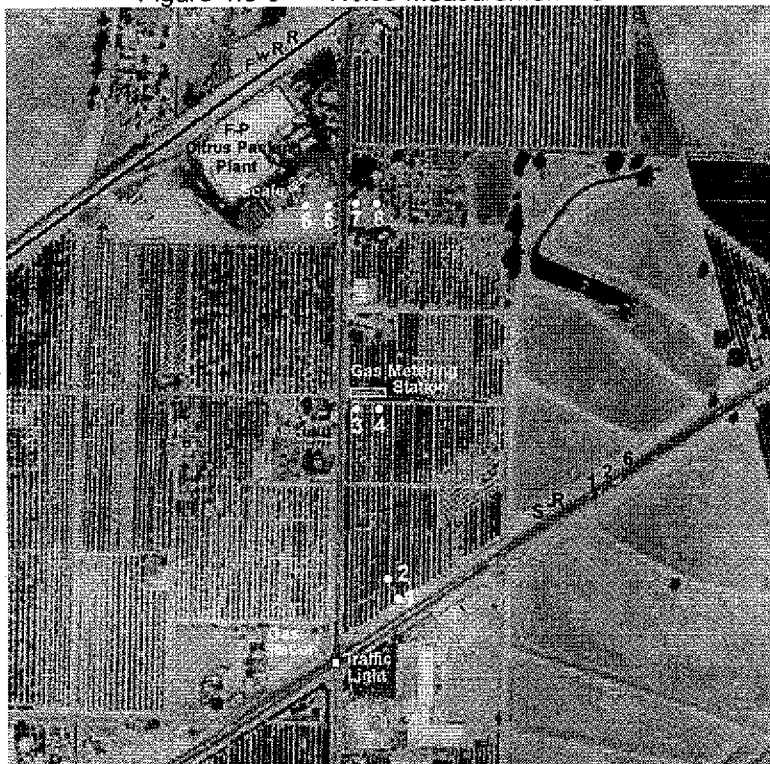
Note 3: Local ambient L_{eq} measurements shall be made on any mid-week day prior to project work.

4.8.1 Environmental Setting

Noise Monitoring

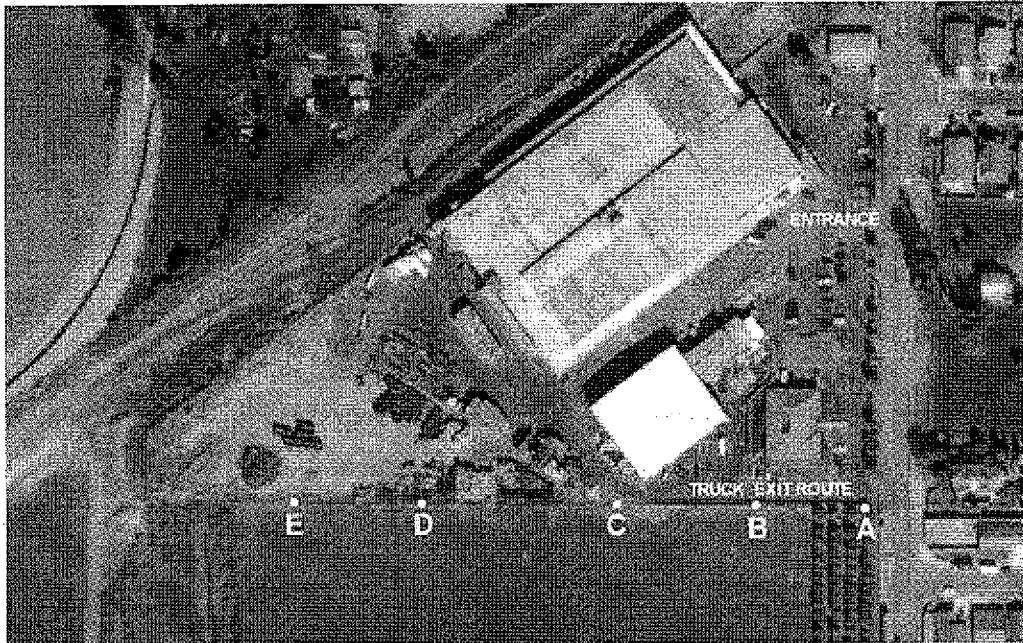
To obtain ambient noise levels, noise measurements were conducted near the project sites and near various noise source locations, including the Fillmore-Piru Citrus Association packing plant, the Rieder property, the SC Gas Company metering station, and along Highway 126 (see Figure 4.8-3). Noise monitoring equipment consisted of six Larson-Davis Model Type 2 sound level meters, which comply with the specifications of the American National Standards Institute (ANSI) and the International Electrotechnical Commission (IEC) for Type 2 sound level meters. These noise measurement systems were calibrated in the field prior to and after noise measurements with a Larson-Davis CA250 acoustical calibrator to ensure the accuracy of the measurements.

Figure 4.8-3 Noise Measurement Locations



Additional noise measurements were subsequently taken in August 2006 adjacent to the FPCA packing plant because of increased level of operations associated with packing plant. These supplementary measurement locations are illustrated in Figure 4.8-4.

Figure 4.8-4 Supplementary Noise Measurement Locations



Traffic Noise

Roadway Noise Measurements – Vehicular traffic noise measurements were conducted along Main Street and Highway 126. Figure 4.8-5 describes the ambient traffic noise levels and measurement conditions.

Figure 4.8-5 Ambient Traffic Noise Levels

	Main Street Sites 7, 8	Main Street Sites 3, 4	SR-126 Sites 1, 2
Observed # Medium / Heavy Trucks (Vehicles/Peak Hour)	5 / 12	5 / 12	n/a
Percentage Medium / Heavy Trucks (% of ADT) ³	4.0 / 5.4	4.0 / 5.4	5.2 / 9.2
Posted Speed Limit (MPH)	25	25	65 (autos) 55 (trucks)
Measured L_{eq} dB(A)	61 @ 50' 54 @ 150'	61 @ 50' 56 ¹ @ 150'	71 ² @ 75' 64 @ 160'

Note 1: Gas regulator valve estimated at 52 dB(A) + traffic at 54 dB(A) yields combined 56 dB(A).

Note 2: SR-126 traffic stops then starts again at the Main Street intersection light.

Note 3: ADT = average daily traffic

Figure 4.8-6 shows the existing Main Street and SR-126 traffic volumes, truck mix, and other relevant noise modeling input data.

Figure 4.8.6 Current Traffic Data and Traffic Noise Predictions

	SR-126 (2005)	Main Street (2005)
Average Daily Traffic (ADT)	27,367	4,052
Day/Evening/Night Split (%)	74/12/15	78/12/10
Total Number of Traffic Lanes	4	2
Posted Speed Limit (MPH)	65 (autos) 55 (trucks)	25
% Trucks (medium / heavy)	5.2 / 9.2 ¹	4 / 5.4 ²
Avg. K Factor (calibration)	-2	0
Predicted L _{eq} dB(A)	71 @ 75'	61 @ 50'
Predicted CNEL	72	60

Note 1: Ventura County truck volume ADT percent data (total is 14.4%) is from VCTC (2005).

Note 2: Observed truck mix percentages, based on hourly count taken on 7/25/05.

Under existing conditions, traffic CNEL levels exceed the County 60 CNEL outdoor noise standard within about 100 feet of the centerline of Main Street and for an estimated 725 feet from SR-126

Agricultural Noise

Agricultural Noise Sources – Although no significant agricultural operations noise was observed during the three site visits, two basic types of noise sources (identified by the County General Plan Hazards Appendix as associated with agricultural activities) occur in the Expansion Area and have the potential for impacts. These are (in addition to pickup and delivery truck noise):

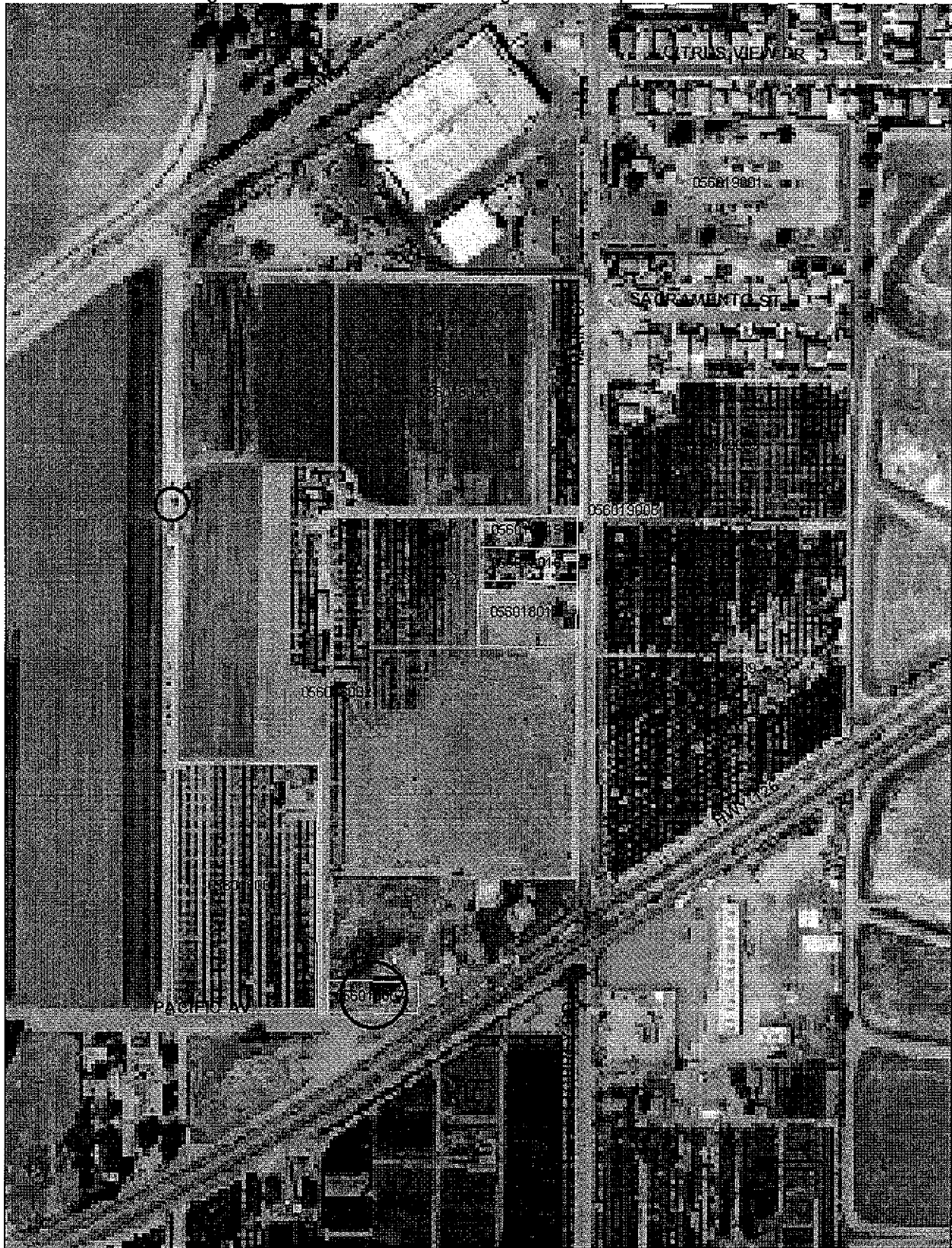
- Cultivation and harvesting equipment
- Irrigation and domestic water pumps

Tractors and other mechanized farm equipment are intermittently used on farmland within and adjacent to the Piru Expansion Area. Tractors and similar mechanized equipment of the sizes use on Ventura County farms project noise levels in the range of 75-85 dB(A) at a distance of 50 feet.

Existing water pumps are located along the west boundary of the Finch component and within the Riesman Water Company property within the County of Ventura component (see Figure 4.8-7). Pump motors generally produce a high-pitched whine and overall noise levels in the range of 70 to 80 dB(A) at 5 feet, depending upon the size of the pump. At a distance of 100 feet, a noisy continuously operating pump could produce over 60 CNEL.

Under existing conditions, the Habitat for Humanity tract and the Citrus View Tract and several existing residences located within the Piru Expansion Area could be impacted by intermittent noise from adjacent farm operations. There are no residences located near the existing water pumps.

Figure 4.8-7 Location of Existing Water Pumps



Industrial Noise

One of two stationary noise sources investigated during the consultant site visits was the Fillmore-Piru Citrus Association (FPCA) packing plant. The packing plant is located immediately north of the Finch property and west of Main Street from the Rieder property.

The noise levels produced by the packing plant were initially acquired on-site in July 2006. The sound levels related to plant cooling fans and truck scale and loading activities represented the highest noise levels measured during the plant visit. The maximum and corresponding L_{eq} sound level during one hour is listed for the packing plant is shown in Figure 4.8-8.

Figure 4.8-8 Hourly L_{eq} and Maximum Sound Levels at Packing Plant

Date/Time	Activity	L_{eq}	L_{max}
7/25/05 18:15-18:20 p.m.	Trucks at Scale & Plant Fans	60	68 dB(A)

Note 1: Includes Contribution from Main Street Vehicle Traffic.

Note 2: Measurements taken 150 feet west of Main Street Centerline.

Subsequent to these noise measurements, the FPCA notified the County that their operations had increased substantially. A second noise investigation was conducted in August 2006. Over a 24-hour period of time 43 trucks were unloaded. The resulting 2006 noise measurements are shown in Figure 4.8-9.

Figure 4.8-9 24-Hour Noise Measurements and Packing Plant Truck Throughput

8/30/06- 8/31/06	Measurement Locations and Distance from Main Street Centerline					# of Trucks
	Site A* 50 ft	Site B 200 ft	Site C 400 ft	Site D 680 ft	Site E 860 ft	
Time	L_{eq}	L_{eq}	L_{eq}	L_{eq}	L_{eq}	
6:00	66.5	56.0	49.2	47.8	45.8	1
7:00	58.0	51.5	47.9	48.3	41.0	
8:00	75.5	55.5	52.3	47.5	49.7	2
9:00	67.0	55.0	54.3	48.3	55.5	2
10:00	66.0	59.0	61.4	49.3	63.0	1
11:00	69.0	73.0	63.8	50.0	60.0	3
12:00	69.0	60.5	59.6	48.7	46.5	5
13:00	67.0	55.0	57.0	49.6	46.4	3
14:00	68.5	60.0	60.1	49.4	47.0	5
15:00	70.0	64.5	61.2	49.2	46.3	11
16:00	69.5	56.5	56.4	48.9	46.0	3
17:00	67.0	54.0	53.6	48.3	46.0	
18:00	67.0	54.5	52.3	47.5	45.7	2
19:00	66.5	52.0	49.2	47.1	45.0	1
20:00	75.5	58.0	54.3	48.3	55.5	
21:00	63.0	50.0	49.2	49.3	44.9	1
22:00	61.0	48.5	48.9	50.2	53.8	
23:00	61.5	51.5	51.0	51.9	52.3	1
0:00	58.0	46.0	47.9	49.3	40.9	

1:00	57.0	45.0	45.9	48.3	38.6	
2:00	66.5	52.0	49.2	47.4	46.5	1
3:00	61.0	46.0	48.9	50.2	53.8	
4:00	58.0	48.0	47.9	48.3	40.9	
5:00	62.0	51.5	51.0	51.9	52.5	1

Total # of Trucks = 43

Truck Noise at 7 feet:

L_{eq} (24 h)	68.2 *	60.9	56.2	49.2	53.3
L_{dn}	74.4 *	64.9	61.6	60.1	61.2
CNEL	78.5 *	66.5	63.0	60.9	62.6

* Traffic on Main Street also is a major noise contributor at Sites A and B.

As can be seen, the maximum noise levels increased from 60 L_{eq} measured in 2005 to 68.2 L_{eq} in 2006. The nearest existing sensitive receptor (residence) within the Piru Expansion Area, is located about 230 feet to the east, within the Rieder property. Based upon the above noise measurements, the packing plant does not currently exceed the County noise standard with respect to the existing Rieder residence.

Noise from Southern California Gas Company Facility

The second stationary noise source investigated was the Southern California Gas Company regulator/metering station. This facility is located within the Levy component adjacent to Main Street. Noise measurements for the gas metering station were taken about 25 feet south of the station fence nearest the regulator valve. The maximum and corresponding L_{eq} sound level during one hour is listed in Figure 4.8-9 for the gas metering station.

Figure 4.8-9 Hourly L_{eq} and Maximum Sound Levels at Gas Metering Station

Date/Time	Activity	L _{eq} ¹	L _{max}
7/25/05 19:00-19:05 p.m.	Regulator Valve	56.3	66.5 dB(A)

Note 1: Includes Contribution from Main Street Vehicle Traffic.

Note 2: Measurements taken 150 feet east of Main Street C/L, 25 feet south of station fence

The nearest existing sensitive receptor (residence) to the gas metering/regulating station is located about 150 feet to the west within the Ventura County component. Based upon the above noise measurements, the gas facility does not currently exceed the County noise standard with respect to the existing nearest residence.

4.8.2 Impacts

Short-Term Noise Impacts:

Noise from the construction phase of the proposed projects would be relatively short-term and intermittent and would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses and the timing and duration of the noise generating activities. County construction noise standards generally limit construction activities to between 7 a.m. to 7 p.m. from Mondays through Fridays and from 9 a.m. to 7 p.m. Saturdays, Sundays and holidays. Applicants have not submitted a construction schedule, but the construction phase is estimated to extend for twenty months or more, depending on whether the construction occurs concurrently or sequentially.

Noise levels generated by construction activities are based on the equipment operating parameters. Figure 4.8-10 lists the estimated unshielded construction CNEL noise, at various distances from receptor locations.

Figure 4.8-10 Estimated Unshielded Construction Daily CNEL Noise

Distance	Clearing	Excavation	Foundation	Structure	Finishing
50 feet	84	89	85	85	89
100 feet	80	85	81	81	85
200 feet	75	80	76	76	80
400 feet	71	76	72	72	76
800 feet	66	71	67	67	71

Source: U.S. EPA Report No. NTID 300.1, 1971

The existing residential ambient noise level is greater than 60 dB(A) CNEL within 725 feet of SR-126 for the current highway traffic. As can be seen from the above table, all construction phases would substantially exceed the 60 CNEL residential noise standard. Thus an intermittent short-term adverse noise impact would occur at different locations during the course of project construction. These noise estimates are for time usage factor related noise generating activities and would not be continuous noise emissions. The actual instantaneous noise emissions would rise and fall due to specific activities, individual equipment distances from the receptor locations and varying equipment operations. Construction noise impacts to adjacent residential receptors, while relatively short-term and intermittent, are nonetheless considered significant.

Long-Term Impacts:

Traffic Noise Impacts

Future traffic CNEL noise predictions were obtained using the three dimensional SoundPLAN 2005 computer model, Version 6.3. This model incorporates the Federal Highway Administration (FHWA) two-dimensional noise prediction model (FHWA-RD-77-108), modified to account for the California vehicle noise emission levels (CALVENO). Traffic volumes reflect projected 2020 cumulative plus project traffic conditions (See Transportation and Circulation Chapter).

Figure 4.8-11 shows predicted 2020 traffic and resulting noise levels adjacent to SR-126 and Main Street.

Figure 4.8-11 2020 Traffic Noise Predictions

	SR-126	Main Street
Average Daily Traffic (ADT) ¹	30,000	10,000
Day/Evening/Night Split	74/12/15 ²	78/12/10 ³
Traffic Lanes	4	2
Speed Limit (mph)	65 (autos) 55 (trucks)	25
Percentage of Trucks (Medium/Heavy)	6/10 ⁴	4/5.4 ⁵
Predicted L _{eq} dB(A)	74 @ 75'	65 @ 50'
Predicted CNEL	75	64

Note 1: From Transportation and Circulation Chapter

Note 2: Based on FHWA Suburban Area Freeway Traffic Distribution Class.

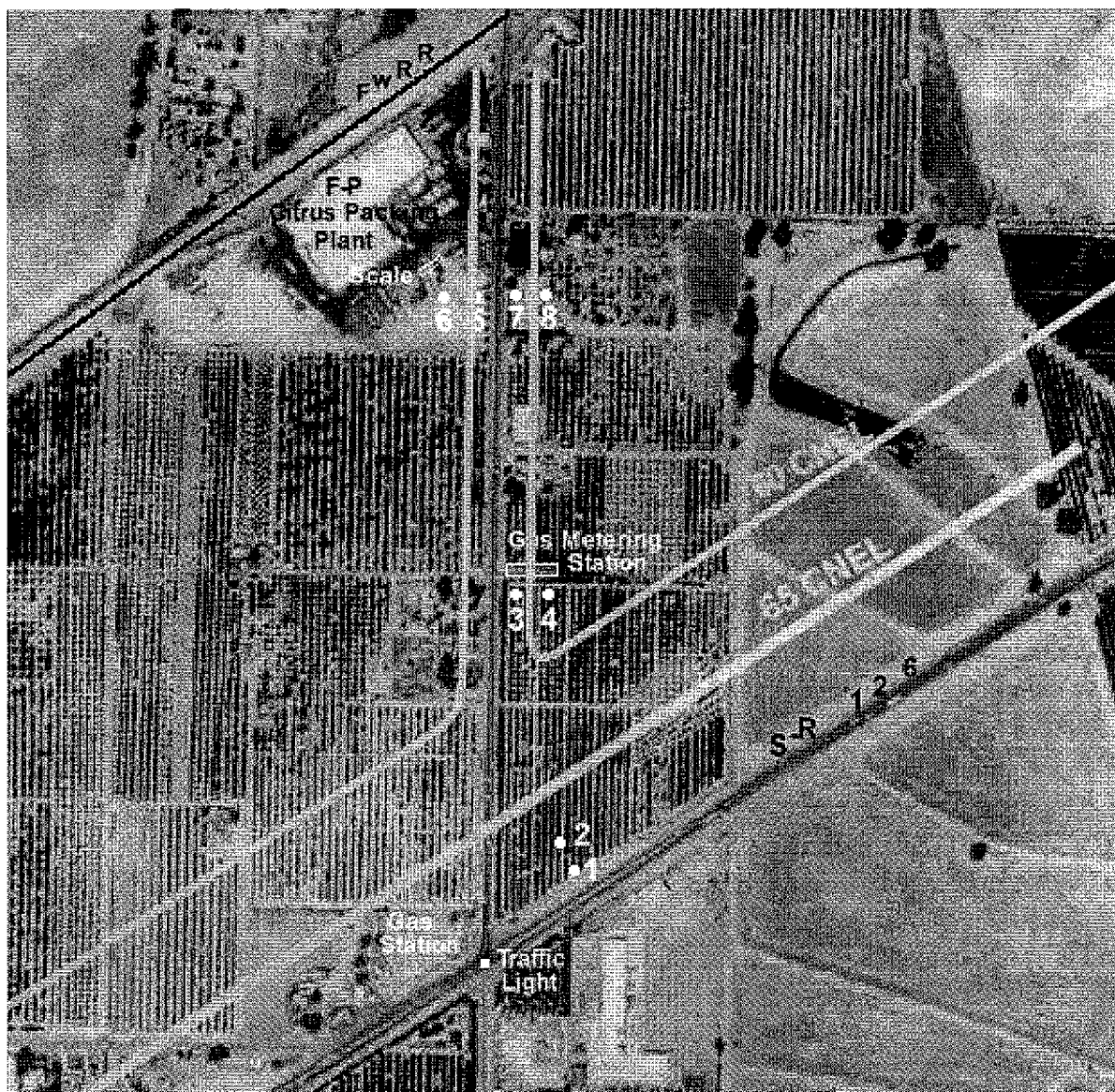
Note 3: Based on FHWA Urban and Suburban Traffic Distribution Class.

Note 4: Ventura County Public Works Agency

Note 5: Observed truck mix percentages, based on hourly count taken on 7/25/05.

Predicted 2020 noise level contours are illustrated on Figure 4.8-12. As indicated on Figure 4.8.11, about two-thirds of the Levy component, about 15% of the Finch component and about half of and County of Ventura component are currently within the existing unmitigated 60 CNEL noise contour due to traffic from Highway 126 and are thus subject to significant noise level in predicted to be in excess of the County's outdoor noise level standard. Additionally, the Rieder property multi-family housing units contain private outdoor recreation areas adjacent to Main Street and are predicted to be significantly impacted by noise from Main Street traffic.

Figure 4.8-12 2020 60 and 65 CNEL Traffic Noise Contours



Agricultural Noise Impacts

Cultivation/Harvesting Equipment - Tractors and similar mechanized equipment of the sizes used on Ventura County farms produce noise levels in the range 75-85 dB(A) at a distance of 50 feet. While the equipment is expected to be operating within this distance of neighbors for only a small fraction of the time, however, cases may occur wherein equipment is used in an unusually loud manner or repeatedly in a specific area near a neighboring residence. These cases could result in potentially significant noise impacts. However, with implementation of the agricultural buffer described in the Agricultural Resources chapter, noise impacts from adjacent agricultural operations are expected to be less than significant.

Water Pumps - Water pumps generally produce a high-pitched whine and overall noise levels in the range 50 to 65 dB(A) at 50 feet, depending upon the size of the pump. At a distance of 100 feet, a proximity within which adjacent residences may exist, a large continuously operating pump could

produce 65 CNEL. This will be a significant noise impact, as well as an annoying condition, due to the tonal character of the noise.

Industrial Noise Impacts

The Fillmore-Piru Citrus Association (FPCA) packing plant was evaluated for noise emissions and determined to generate on-site noise levels of 60 up to 68.2 dB(A) L_{eq} . Additionally, the FPCA indicates that it is currently only operating at 30% of planned capacity. The County Noise consultant modeled noise impacts from the packing plant assuming operations at 100% capacity. Figure 4.8-13 illustrates the results of the consultant's noise modeling.

Figure 4.8-13 Existing and Projected CNEL Noise Levels at the FPCA Packing Plant

	Measurement Locations					# of Trucks
	Site A*	Site B	Site C	Site D	Site E	
Existing CNEL @ 30% Capacity	78.5 *	66.5	63.0	60.9	62.6	43
Projected CNEL @ 100% Capacity	83.6*	71.6	68.2	66.1	67.7	140

* Traffic on Main Street also is a major noise contributor at Sites A and B.

At 100 percent capacity, the packing plant is expected to increase noise levels by an additional 5.1 dB. Without mitigation, proposed housing units on the Finch property located within 52 feet of the FPCA packing plant property line could exceed the County outdoor noise level. The and Rieder and Levy components and Component D properties are not-expected to exceed the County's outside noise level standard due to packing plant activities.

Noise Impacts from Southern California Gas Co. Metering & Regulator Facility

The gas metering and regulator facility was evaluated for noise emissions and was determined to generate noise levels of 56.3 dB(A) L_{eq} at a distance of 25 feet. Therefore, proposed housing units from the adjacent Levy component are not expected to exceed the County's outdoor noise level standard due to noise from this facility.

Park Noise Impacts

One of the applicants (Mr. Finch) proposes a park within the Finch component. While no specific location was identified by the applicant, the consultant evaluated the potential noise impacts from a park. Figure 4.8-13 shows the results of outdoor activity noise measurements taken at various outdoor youth gatherings.

Figure 4.8-13 Noise Generated by Typical Children's Activities

Noise Source(s)	Approximate Distance Between Source and Receptor	Measured Noise Level, dB(A)
Elementary school P.E. class	300 feet	50 $L_{eq} 1H$
Elementary school P.E. class & traffic	30 feet	59 $L_{eq} 1H$
Front of school, traffic & ambient	30 feet	56 CNEL
Children's playground	90 feet	54 $L_{eq} 1H$
Playground & nearby traffic	120 feet	54 $L_{eq} 1H$
Large gathering of noisy children.	80 feet	58 $L_{eq} 1H$
Rear of school, recess, P.E. & ambient	150 feet	55 CNEL
Children's playground	150 feet	55 $L_{eq} 1H$

The above children's activities would not exceed the County's 60 CNEL outdoor noise standard at the nearby residences and would therefore not result in a significant noise impact. However, if a

skateboard section is planned within the park; careful planning would be required as such facilities can generate over 90 db(A) at 10 feet.

General Plan Goals, Policies and Programs:

The General Plan noise goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the exception of the following:

Policy 2.16.2-1 All discretionary development shall be reviewed for noise compatibility with surrounding uses. Noise compatibility shall be determined from a consistent set of criteria based on the standards listed below. [...]

(1) Noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that:

a. Indoor noise levels in habitable rooms do not exceed CNEL 45.

b. Outdoor noise levels do not exceed CNEL 60 or $L_{eq}1H$ of 65 dB(A) during any hour. [...]

(5) Construction noise shall be evaluated and, if necessary, mitigated in accordance with the County Construction Noise Threshold Criteria and Control Plan.

Policy 2.16.2-2 Discretionary development which would be impacted by noise [...] which cannot be reduced to meet the standards prescribed in Policy 2.16.2-1(1) shall be prohibited. This policy does not apply to noise generated during the construction phase of a project if a statement of overriding considerations is adopted by the decision-making body in conjunction with the certification of a final Environmental Impact Report.

These policies are in support of the following goal:

Goal 2.16.1 *To protect the health, safety and general welfare of County residents by elimination or avoidance of adverse noise impacts on existing and future noise sensitive uses.*

The project, as proposed, would place homes as close as 16 feet from the SR-126 highway right-of-way, well within the 60 dB(A) CNEL noise impact area caused by traffic on State Highway 126. As a result, the project would exceed the County's exterior noise standard described in General Plan Policy 2.16.2-1(1)b. Unless noise impacts can be reduced below the County noise standard, the project would have to be denied pursuant to Policy 2.16.2-2.

The Piru Area Plan noise goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

Policy 2.4.2-3 *Noise sensitive uses [...] shall be buffered from noise generating facilities (such as highways [...]) by the placement of walls, berms, and the establishment of setbacks, greenbelts or other appropriate means.*

The closest homes to SR-126 on the Levy site would be separated from the highway by a landscaped lot, proposed to be a minimum of 16 feet in width. Without the employment of sound attenuating walls or berms this landscaped lot/setback would not be sufficient to address significant noise impacts from the highway. The Finch site is located approximately 100 feet from SR-126 while the County of Ventura component is located approximately 200 feet from SR-126 (Thompson property). Specific development plans have not been submitted for either of these components, however, residential development this close to the highway would be within the 60 dB(A) CNEL noise impact area for this highway. Thus, the project can be deemed to be potentially inconsistent with Piru Area Plan Policy 2.4.2-3.

4.8.3 Mitigation Measures

Mitigation for Temporary Construction Noise Impacts:

- N-1** Construction shall be limited to 7 a.m. to 7 p.m. Monday through Friday, and from 9 a.m. to 7 p.m. Saturday, Sunday and holidays.
- N-2** To be certain that noise from construction equipment and operations are minimized to the extent feasible, all construction contractors shall adhere to all applicable equipment and operations noise reduction measures contained in Appendix D of the County's adopted *Construction Noise Thresholds and Control Measures* (see Appendix 8.6). A copy of this Appendix D shall be provided to all construction contractors.
- N-3** Prior to initiation of grading, all adjacent homes will be provided with appropriate phone numbers in the event of noise complaints. These numbers shall include the site superintendent/supervisor as well as the Planning Division condition compliance personnel.

If a construction related noise complaint is received, and determined to be valid by the County Planning Division, the County Planning Division shall employ (at the applicant's expense) an acoustical professional to determine if County noise standards ~~have been~~ are being exceeded. In the event the requirements identified in Measure N-2 are not adequate in reducing construction noise impacts at existing residences, the contractor shall also implement construction noise propagation path reduction measures and/or sensitive receptor construction noise reduction measures, as described in Appendix D of the County's adopted *Construction Noise Thresholds and Control Measures* (see Appendix 8.6).

Mitigation for Traffic Noise Impacts:

State Highway 126 is projected to exceed the County outdoor noise standard for development planned within the Levy, Finch and County of Ventura components. In order to mitigate these traffic noise impacts while maintaining the applicant's proposed tract map design the consultant recommends a wall or a combined wall and earthen berm combination between Highway 126 and the proposed housing developments. To mitigate traffic noise impacts to comply with the County's outside noise standard, the wall/berm would need to be six to nine feet in height along the southern portion of Main Street Finch & Levy components), ten to 14 feet in height along Pacific Avenue (County of Ventura component), seven to 14 feet in height around the perimeter of the highway commercial parcel (Finch & County of Ventura components) and 11 to 19 feet in height along Highway 126 Levy component) and six to nine feet in height along the eastern edge of the Piru Expansion Area (Levy component).

While tall sound walls may be physically feasible, a wall/berm of such height would itself result in significant visual impacts (see Scenic Resources chapter) and would contradict recommendations by the Piru Area Plan Update committee which has recommended avoidance of subdivision walls because they are perceived to isolate the new housing from the community and attract graffiti (see proposed Piru Residential Design Guidelines Appendix 8.3). It is also noted that the County Zoning Ordinance limits fences and walls to a maximum of seven feet (eight feet when across the street from commercial and industrial zoned property) per Zoning Ordinance Section 8106-8.1.1. For these reasons, construction of wall/berm up to 19 feet in height is not considered a feasible mitigation measure.

In lieu of constructing an oversized wall/berm, traffic noise impacts can also be mitigated by the following recommended mitigation:

Exterior Noise Mitigation

- N-4** To reduce traffic noise impacts the following shall be required:
- Residential development shall be setback a minimum of 250 feet from the right-of-way of SR-126;
 - A six-foot high landscaped berm shall be provided on the Levy property along SR-126 and along the eastern property line for a distance of 750 feet north of Highway 126; and

c. Proposed housing shall be designed to face outward towards the highway with no large openings other than minimum required side setback requirements, so that the houses themselves act as a sound attenuating barrier, providing rear yards which comply with the County outdoor noise standard. Likewise development along Pacific Avenue and Main Street shall be designed to face outwards in the same manner to avoid the need for oversized subdivision walls.

Items (a), (b) and/or (c) may be waived or the dimensional requirements provided herein may be altered with the approval of the Planning Director, if a qualified acoustical consultant provides a report that demonstrates the proposed subdivision will comply with the County's outdoor noise standard. However, any proposal that involves sound attenuating walls of any height, or berms (or wall/berm combinations) in excess of six feet in height shall be reviewed by the Piru Neighborhood Council.

An illustration of how this recommended mitigation measure might look can be seen in the Project Alternatives chapter, Figure 5-1. The recommended 250 foot setback could result in the loss of about 2.7 acres⁵ of developable land on the Levy site, could reduce the project size by an estimated 17 to 23 (out of 104 proposed) dwelling units and would require a major redesign of the project to reorient the housing units. About 0.6 acre of the Finch property is also within this 250 foot setback. Thus the Finch property could suffer a loss of perhaps four to five dwelling units.

Interior Noise Mitigation – Homes Located Within 100 Feet of the Centerline of Main Street (60 to 65 dB(A) CNEL)

N-5 The following is applicable to homes located within 100 Feet of the centerline of Main Street (60 to 65 dB(A) CNEL):

- a. All windows with an unobstructed view of Main Street shall have a minimum STC (sound transmission class) rating of 24.⁶
- b. Outdoor private recreation areas for multi-family housing (e.g., Rider component) shall be located to the rear of residential buildings, so that the building would act as a sound attenuating barrier, providing rear recreation areas which comply with the County outdoor noise standard.

Interior Noise Mitigation – Homes Located between 300 and 750 feet of the Centerline of SR-126 (60 to 65 dB(A) CNEL)

N-6 The following is applicable to all homes located between 375 and 750 feet of SR-126 (60 to 65 dB(A) CNEL):

All windows with an unobstructed view of SR-126 shall have a minimum STC (sound transmission class) rating of 24.

Interior Noise Mitigation – Homes Located Within 300 Feet of SR-126 (Over 65 dB(A) CNEL)

N-7 The following is applicable to homes located within 300 feet of SR-126 (over 65 dB(A) CNEL):

- a. All windows with an unobstructed view of SR-126 (including homes that may be located along Pacific Avenue) shall have a minimum STC rating of 24 (first floor) and 29 (second floor) and sliding glass windows with exposure to SR-126 shall have a minimum STC rating of 30.

⁵ Approximate 1.6 acres of the Levy site is currently planned for stormwater detention and a small landscaped parcel. A 200 foot setback would add an additional 2.7 acres to the landscaped parcel for a total of 4.3 acres that would be unavailable for residential development.

⁶ With respect to interior noise, windows are the weak spot in building construction. Glass does not block sound well. Window soundproofing can be improved by using thicker glass, using laminated glass, or by using multiple panes of glass with air space between the panes. Sound transmission Class (STC) is a single number quantifier used to rate partitions, doors and windows for their effectiveness in blocking sound. A single pane of glass has an STC rating between 24 and 28. Dual pane glass has an STC rating between 28 and 35.

- b. Windows shall be mounted in low air-infiltration frames (0.5 cfm/ft. or less per ANSI specifications)
- c. Exterior doors facing SR-126 shall be solid core with perimeter weather-stripping and threshold seals.
- d. Air conditioning or mechanical ventilation is required to allow residents to keep doors and windows closed, and thus provide the required sound insulation.
- e. Second floor balconies with a view of SR-126 are prohibited.
- f. Roof or attic vents shall be located on the side opposite SR-126 or baffled so that sound must take an indirect route when entering the attic space. Proposed vent treatments shall be approved by a qualified acoustical consultant prior to construction.

N-8 Prior to recordation of any tract map in the Piru Expansion Area, applicants shall provide a report from a qualified acoustical engineer demonstrating that the proposed subdivision will comply with the County noise standards.

Mitigation for Agricultural Noise:

N-9 Any houses located between 100 and 200 feet of an existing water pump shall be subject to the requirements described in measure N-6 above. Any houses located within 100 feet of an existing water pump shall be subject to the requirements described in measure N-7 above.

Alternatively, control of excessive pump noise could be accomplished by erecting an impervious barrier around the side(s) of the pump and motor that would block line-of-sight noise transmission to noise-sensitive receptors. This would not need to include more than three sides of the pump, so that ventilation would not be impeded.

These measures will not be required if a qualified acoustical consultant can demonstrate the pump will not result in an exceedance of the County's noise standard.

Mitigation for Community Park Noise:

N-10 If the proposed park is planned to have a skateboard section, the location and design should be carefully planned to minimize noise impacts on nearby residents. The skateboarding area shall be constructed of smooth concrete on stiff structures to reduce the rolling noise levels and the noise of skateboard jumps, grinds and falls.

Mitigation for Industrial Noise

N-11 An 8 foot high sound wall shall be constructed between the FPCA packing plant and the Finch Property. Where visible from public roads, the wall shall be landscaped or otherwise designed to discourage graffiti. This requirement may be waived if no residential properties are planned within 52 feet of the FPCA packing plant.

4.8.4 Residual Impacts

Implementation of the above measures will avoid exceedance of the County noise standards and will generally reduce noise impacts to less than significant levels. However, even with mitigation, construction related noise may result in significant short-term, intermittent noise impacts on nearby residents. With implementation of the above mitigation measures, the project can be deemed to be consistent with General Plan Policy 2.16.2-1 and 2.16.2-2 and Piru Area Plan 2.4.2-3.

Additionally, as the FPCA packing plant operates 24 hours per day, 7 days per week, nighttime operations may cause an annoyance to some residents located in close proximity to the packing plant due to plant operations, truck activity and nighttime lighting. While such noise is not expected to violate the County noise standards, it is recommended that homeowners adjacent to the packing plant (within Component C) or facing the packing plant from across the street (within Component A) be notified of the packing plants hours of operation to ensure homeowners are aware of potential nuisance impacts associated with the FPCA packing plant.

4.9 Transportation and Circulation

This section addresses the project and cumulative impacts related to the following topics:

- 1) level of service of public roads
- 2) safety/design of public and private roads
- 3) pedestrian and bicycle facilities
- 4) bus transit

This chapter was prepared based upon a December 2005 traffic analysis and a February 2004 traffic safety analysis prepared by Katz, Okitsu & Associates, consulting traffic engineers and traffic planners.

The County *Initial Study Assessment Guidelines* specify the threshold criteria for traffic and circulation related issues. The following is a summary of those criteria:

Level of Service of Public Roads

Level of Service (LOS) is a term that provides a qualitative description of operating performance of a road or intersection based on traffic conditions regarding speed, travel time, freedom to maneuver; traffic interruptions and motorist's perceptions. As described in Figure 4.9-1, the levels range from LOS "A" (free flow conditions) to "F" (jammed conditions).

Figure 4.9-1 Roadway Levels of Service

LOS	Traffic Conditions
A	Free uninterrupted low volume flow at high speeds with no restriction on maneuverability (lane changing) and with little or no delays.
B	Stable flow with some restrictions to operating speed occurring.
C	Stable flow but with speed and maneuverability restricted by higher traffic volumes. Satisfactory operating speed for urban locations with some delays at signals.
D	Approaching unstable flow with tolerable operating speeds subject to considerable and sudden variation, little freedom to maneuver and with major delays at signals.
E	Unstable flow with volume at or near capacity, lower operating speeds and major delays and stoppages.
F	Forced flow operation with low speeds and stoppages for long periods due to congestion. Volumes below capacity.

The minimum acceptable LOS for road segments and intersections adopted by the County is:

- LOS D for all County thoroughfares, Federal highways and State highways in the unincorporated area of the County (except SR-33, Santa Rosa Road, Moorpark Road and SR-34).
- LOS E for State Route 33 between the northerly end of the Ojai Freeway and the City of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road and State Route 34 north of the City of Camarillo; and
- LOS C for all County-maintained local roads.

At any intersection between two roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the two shall be the minimum acceptable LOS for that intersection.

The County Public Works Agency has adopted standard methodology guidelines that cover this issue in more detail (*County Initial Study Assessment Guidelines* – section 22.a(1)). Generally, any project that would cause an existing or planned road to fall below its LOS standard, or add one or more peak-hour trips to a road that is already operating at below its LOS standard, is considered as having a significant impact.

Specific criteria for determining intersection capacity and street segment LOS is provided in Appendix 8.7.1.

Safety and Design of Public and Private Roads

Most development projects affect the public road system through accessing, improving or widening existing roads, and/or constructing new roads. Projects that access, improve or widen roads in accordance with the County Road Standards and VCFPD Private Road Guidelines generally have a less-than-significant impact on the safety and design of the public and private road system. Project impacts on intersections that exceed applicable State traffic signal warrants are considered significant.

Pedestrian and Bicycle Facilities

If the project includes new sidewalks and roadway pavement widths sufficient to accommodate pedestrian/bicycle traffic in accordance with the current *County Road Standards*, the project will have a less than significant impact. Bicycling on public roads within residential subdivisions and neighborhoods is generally regarded as safe and adequate, if the roads meet the *County Road Standards*.

A project that will cause actual or potential barriers or increase the potential for vehicle – pedestrian/bicycle conflicts on existing or planned pedestrian/bicycle facilities may have a significant impact. Projects that generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities may have a significant impact. Pedestrian over-crossings, traffic signals and bikeways are examples of these types of facilities.

Bus Transit

A project will normally have a significant impact on bus transit if it would substantially interfere with existing bus transit facilities or routes, or if it would create a substantial demand for new or additional bus transit facilities/services.

4.9.1 Environmental Setting

Public Roads and Highways - Level of Service:

Existing Circulation Network

Streets in the project vicinity which could be affected by the proposed projects include Main Street, Center Street, Via Fustero, Orchard Street, Pacific Avenue, and SR-126.

Main Street is the major north-south collector street through Piru. All of the proposed projects are located along or near Main Street, south of the town center. Near the project vicinity the roadway provides one lane in each direction with no median or left turn pockets. Main Street connects SR-126 to the south with the town business district and residential areas. It continues north to Lake Piru as Piru Canyon Road. Main Street generally has a 36-foot width from SR-126 to just south of the railroad crossing. It widens to approximately 40 feet just south of the crossing, narrows to 24 feet at the railroad crossing, and widens back to 40 feet north of the crossing. The posted speed limit is 25 mph and parking is allowed on both sides of the street. The daily traffic volume on Main Street is approximately 4,000 vehicles per day.

North of Via Fustero, land use along Main Street is a mixture of commercial and residential, with the town's commercial core along Main Street just south of Center Street, and along Center Street just east of Main Street. The land uses just south of Via Fustero consist of light industrial on the west side and residential on the east side. South of Sacramento Street and north of SR-126 land use is agricultural/open space, with commercial at the intersection of Main Street at SR-126. Main Street has

all-way stop intersections with Center Street at Via Fustero, and a signalized intersection with SR-126. There is an at-grade railroad crossing of Main Street located just north of Via Fustero. This crossing is used occasionally by Fillmore and Western Railroad not currently used and has no operating gates or warning flashers.

Center Street is the major east-west collector street through Piru. The roadway has a 40-foot width providing one lane in each direction with no median or painted left-turn lanes. It assumes a northwest-southeast alignment east of Piru Creek, and connects to SR-126 approximately one mile east of town. There is a railroad crossing west of Via Fustero where crossing gates are being installed. West of the railroad there is an uncontrolled decorative crosswalk.

On-street parking is allowed along most of Center Street. The posted speed limit is 25 mph west of Orchard Street and 35 mph east of Orchard Street. From Piru Creek to SR-126 the speed limit is 45 mph.

The daily traffic volume on Center Street is approximately 900 vehicles per day. The intersections of Center Street at Main Street, and Center Street at Via Fustero are all-way stops. Orchard Street is stop-controlled at Center Street. The intersection of Center Street at SR-126 is stop-controlled on Center Street. Land uses along Center Street near the town center are a mixture of commercial and residential, while east of Orchard Street there is open space and an off-road vehicle recreation area. All of the cumulative residential projects included in this study will add additional traffic onto are located along Center Street.

Via Fustero is a 2-lane undivided street on a northeast-southwest alignment located to the north of the project sites, to the east of the town center, and to the west of the residential cumulative project sites. Parking is allowed on both sides of the street. The speed limit is posted at 25 mph. The daily traffic volume on Via Fustero is approximately 1,200 vehicles per day. The street has all-way stop intersections with Main Street and Center Street. The intersection of Via Fustero at Main Street is aligned in a "Y" configuration, while the intersection of Via Fustero at Center Street is a "T" intersection with the minor leg of the "T" (Via Fustero) at an acute angle to the major leg (Center Street). Land use along the south and east side of the street is residential, while north and west of the street is the railroad tracks with the new railroad station and park along the west side of the tracks.

Orchard Street is a 2-lane undivided street on a north-south alignment located to the north of the City center. The speed limit on Orchard Street is 25 mph. The daily traffic volume on Orchard Street is approximately 500 vehicles per day. Parking is allowed along both sides of the street. The street has an all-way stop intersection with Main Street, and a stop-controlled intersection with Center Street on the minor leg (Orchard). Land use along the street is primarily residential, with some recreational (Warring Park).

Pacific Avenue is a 2-lane undivided street on an east-west alignment in the project vicinity near SR-126, and a north-south alignment west of the project vicinity where it has a second intersection with SR-126. Pacific Avenue is located immediately to the south of the project sites. The speed limit on Pacific Avenue is 25 mph in the project vicinity. The daily traffic volume on Pacific Avenue is approximately 100 vehicles per day. Parking is allowed along both sides of the roadway. The street has stop-controlled intersections with SR-126 both west and east of the project sites, with the stops on the minor legs only (Pacific Avenue). Land use along the street is mainly agricultural, with some industrial and commercial near its eastern intersection with SR-126.

State Route 126 (SR-126) is a 4-lane divided expressway on a southwest-northeast alignment in the project vicinity. SR-126 is located approximately 1 mile south of the town center and ¼ mile south of the project sites, and provides regional circulation for this part of Ventura County, connecting Interstate 5 (I-5) and the City of Santa Clarita in Los Angeles County with the City of Ventura and US-101 to the west. The cross-section of the highway generally provides two-lanes in each direction, with paved shoulders and a continuous striped median that provides room for a center turn lane for left-turn vehicles.

The speed limit for autos on SR-126 is 60 mph east of Main Street and 55 mph west of Main Street. ~~and~~ The daily traffic volume is approximately 27,000 vehicles per day. The highway has a signalized

intersection with Main Street, and a stop controlled intersection with Center Street, with the stop sign on the minor leg only (Center Street). Curb parking is not allowed on either side of the highway. The land use along both sides of the street is agricultural.

Traffic Controls

Existing multi-way intersection traffic controls in the town of Piru are limited.

Traffic Signal - There is an existing traffic signal at the intersection of Main Street at SR-126. The traffic signal has permissive phasing with two phases. One phase is for SR-126 and the other is for Main Street. There are no left-turn phases. There are "SIGNAL AHEAD" flashing beacons on SR-126 in advance of the intersection, because this is the only traffic signal on SR-126 for approximately 5 miles in either direction.

Stop Signs - There are All-Way Stops at the intersections of Main Street at Orchard Street, Main Street at Center Street, Main Street at Via Fustero, and Center Street at Via Fustero. There are also stop signs on Orchard Street for both approaches to Center Street. Other stop signs are located within the project limits at the intersections of Center Street at SR-126 and Pacific Avenue at SR-126. Side street approach stop signs are also used to control access to Center Street, Main Street, and SR-126 from other minor streets in the community.

Speed Limits - Most streets within the community have a posted speed limit of 25 mph, or they are classified as residential or commercial areas, where State Law defines a 25 mph limit. SR 126 and Center Street have speed limits of 35 to 60 mph as stated previously in the individual roadway descriptions.

Traffic Count Data

Existing daily and peak hour traffic data was collected for this study by The Traffic Solution of Arcadia, California, in June 2005.

Street Segment Level of Service (Existing Conditions)

Figure 4.9-2 describes the daily, peak hour and level of service for the three study street segments (SR 126, Main Street and Center Street)

Figure 4.9-2 Street Segment Level of Service (Existing Conditions)

Street Segment	ADT Volume	A.M. Peak Hour Volume	P.M. Peak Hour Volume	Level of Service
State Highway				
SR-126	27,367	1,418	1,952	B
County Roadways				
Main Street	4,052	316	351	B
Center Street	994	91	83	A

As indicated by Figure 4.9-2, LOS at all three road segments operate at LOS B or better under existing conditions.

Peak Hour Intersection Level of Service (Existing Conditions)

Based on existing traffic volumes, LOS analyses were conducted for the seven study intersections. The results of these analyses are summarized in Figure 4.9-3 for the existing conditions.

Figure 4.9-3 Peak Hour Intersection LOS (Existing Conditions)

Intersection	A.M. Peak Hour		P.M. Peak Hour	
	Volume/Capacity or Delay	LOS	Volume/Capacity or Delay	LOS
Signalized Intersections				
SR-126 @ Main Street	0.349	A	0.415	A
Unsignalized Intersections				
Main St. @ Via Fustero	7.6	A	7.8	A
Main Street @ Center Street	7.3	A	7.5	A
Main Street @ Orchard Street	7.2	A	7.4	A
Center Street @ Orchard Street	9.0	A	9.1	A
SR-126 @ Center Street	19.6	C	25.2	D
SR-126 @ Pacific Avenue (east)	0.0	A	11.1	B

Note 1: Volume/Capacity shown for signalized intersections; Average delay shown for unsignalized intersections

As shown in the table, six of the seven study intersections operate at LOS C or better under the existing conditions scenario. Only one unsignalized intersection, SR-126 at Center Street operates at LOS D in the P.M. peak hour. The poor reported LOS is experienced only by a very low number of vehicles making a southbound left-turn from Center Street to eastbound SR-126. It is noted that LOS D is considered by the County to be an acceptable LOS for an intersection with a State highway.

Safety and Design of Public and Private Roads

Katz, Okitsu & Associates made numerous traffic safety and circulation recommendations in the February, 2004 study on *Traffic and Circulation Study in the Town of Piru*. In the more recent December 2005 traffic analysis, the consultant re-evaluated these recommendations based on traffic and circulation changes caused by the proposed projects.

The following traffic safety issues were identified by the consultant:

Signalized Intersection on SR-126 at Main Street - This intersection was identified as a potentially hazardous location due to high speeds on Highway 126 and the historical frequency of accidents. A review of the accident history revealed a sharp increase in rear end accidents in this area. In addition to accidents, the consultant identified evidence of excessive skid marks on the pavement in advance of the intersection. Vehicles that must brake heavily to stop in time to avoid rear end accidents often cause these types of skid marks.

County Public Works and Caltrans are jointly planning improvements at this intersection that will result in: improvements to signal-phasing, provide longer mast arms and new left-turn signal heads, provide new signal timing software, and lengthen the left turn storage capacity on southbound Main Street and eastbound SR-126. Caltrans indicates that funding of this project is has been placed on the 2006/2007 fiscal year waiting list and must compete for funding with other high priority projects. If funded, construction of these improvements could begin as early as Summer 2007.

Intersection of Main Street at Via Fustero - In 2004, the consultant noted the unusual configuration of the stop controls results in confusion and violates drivers expectations that opposing traffic is required to stop. Since then, the County has re-configured this intersection to an all-way stop. Via Fustero has also been re-striped at Main Street to provide closer to a 90° angle with Main Street. Safety issues remain with respect to a building column that encroaches into the roadway and a need for traffic calming.

Main Street from Via Fustero to Center Street – The consultant identified a lack of curb and gutter along parts of Main Street in this area and impaired sight distance for west bound motorists on Market Street due to an overgrown tree.

Additionally, safety issues exist with respect to the railroad (lack of pavement markings, no working railroad crossing gate). Ventura County Transportation Commission (VCTC) staff indicates that these railroad crossing improvements will occur prior to re-establishment of the planned tourist train rail service and will be the responsibility of VCTC.

Intersection of Main Street at Center Street – Residents have noted that northbound motorists sometimes violate the all-way stop sign at this intersection.

Intersection of Main Street at Orchard Street – The community has requested a stop sign for southbound traffic on Piru Canyon Road. Since 2004, a stop sign has been added at this location.

Piru Canyon Road - Piru Canyon Road allows high speeds for southbound vehicles approaching Piru. There is an existing 25 mph speed limit sign that is sometimes ignored by southbound vehicles.

Intersection of Center Street at Via Fustero – The consultant reported in 2004 that the intersection configuration is unusual due to the angle of the intersection. The south and east legs were uncontrolled which can cause confusion. This intersection has been recently improved with an all-way stop configuration. The south leg of the intersection was also re-stripped with a painted channelizing island to slow traffic and directs it to the appropriate travel lanes.

Intersection of Center Street at Orchard Street – There is a frequently used pedestrian crossing at this location. The plan for the Phase 1 Rancho Camulos Rail/Trail project shows improvements at this location. The Phase 1 plan shows wheelchair ramps and a crosswalk across Center Street at this location. This plan has not yet been implemented. There is a need for traffic calming at this location to enhance pedestrian safety. A sign directing traffic to use Orchard Road to access Lake Piru is poorly located.

Center Street from Piru Creek Bridge to SR-126 - The speed limit on Center Street from Piru Creek to SR-126 is posted at 45 mph. The roadway is not designed for high speeds, and observed traffic is traveling slower than the posted 45 mph speed limit.

Intersection of Center Street at SR-126 – There is no westbound right-turn lane from Highway 126 to Center Street. Vehicles reducing speed to enter Piru at this location would impair traffic movement on Highway 126. Visibility for motorists wishing to turn left on Highway 126 from Center Street is impaired due to a curve on Highway 126 and safety is further jeopardized by the relatively high speed of traffic on Highway 126.

Piru School Safety and Circulation Issues

Pedestrian Access - Observation of pedestrian behavior patterns near the Piru School area have shown that inadequate pedestrian walkways are significant contributing factors to traffic congestion near the school. Pedestrians have been observed walking in the street due to lack of adequate sidewalks near the school. Many sidewalks near the school have discontinuous or non-existent pavement, and/or pavement of inadequate width for two persons to walk side-by-side. The sidewalks need to be resurfaced and in some cases widened and paved where only dirt exists now.

The Piru RDA has funded the construction of sidewalks along Center Street and Main Street. Sidewalk construction is expected to be complete by early 2006. However, the proposed sidewalk improvements will not extend south of Camulos Street on the West side of Main Street. Additionally, the RDA plans to construct a pedestrian bridge on Center Street at Warring Wash to further improve safety for school children and other pedestrians.

Vehicular Circulation - Observation of vehicular circulation patterns associated with arrival and dismissal times at the Piru School area have shown that lack of a suitable vehicle turnaround area for drop-offs is a significant contributing factor to traffic congestion near the school. Center Street is not a through street west of Main Street, and it does not provide an adequate turnaround. As a result it can be difficult for vehicles to turn around after dropping off students.

Pedestrian/Bicycle Pathways

An existing multi-purpose pathway has been constructed between Warring Park and Main Street along the railroad right-of-way. The County plans to construct a new pathway from the north side of Center Street at Orchard Street eastward across Piru Creek and then along the railroad right-of-way for several miles to Rancho Camulos. Completion of this new pathway is expected in 2007.

Bus Transit Issues

Ventura Intercity Service Transit Authority (VISTA) currently provides dial-a-ride service from Piru to Fillmore. They currently have 15 regular subscribers for this service. VISTA will extend regular bus service east along highway 126 when they perceive sufficient demand for such service. There are currently no transit facilities (bus turnout, bus shelter) within the community. Additionally, narrow streets and tight turning radii within the existing community limits where bus service can be safely provided.

4.9.2 Impacts

Impacts on Level of Service on Public Roads

This section evaluates (1) Project-generated traffic, (2) Project-generated traffic added to existing traffic conditions, (3) Cumulative buildout traffic conditions (without the project) and (4) Project-generated traffic added to cumulative buildout traffic.

Project-Generated Traffic

Trip generation is a measure or forecast of the number of trips that begin or end at the project site. All or part of these trips will result in traffic increases on the streets where they occur. Traffic generation is a function of the extent and type of development proposed for the site.

The trip generation rates used for this study were provided by *ITE Trip Generation, 7th Edition*. The ITE report is widely used in Southern California and indicates the probable traffic generation rates for various land uses based on studies of existing developments in comparable settings.

Trip generation rates specific to this study are presented in Figure 4.9-4. The trip generation for the proposed projects consisting of 394 dwelling units is presented in Figure 4.9-5. Agricultural fields currently occupy the project sites. Existing traffic to and from the project sites is negligible, therefore no trip credits were applied to the project sites.

Figure 4.9-4 Trip Generation Rates

Figure 4.9-4

Trip Generation Rates

Land Use	Measure	Daily	A.M. Peak Hour			P.M. Peak Hour		
			Total	In	Out	Total	In	Out
Trip Generation Rates								
Single-Family Detached Housing ITE Code 210	DU ¹	9.57	0.75	0.187	0.563	1.01	0.636	0.374
Apartment ITE Code 220	DU ¹	6.72	0.51	0.102	0.408	0.62	0.403	0.217
Residential Condominium/Townhouse, ITE Code 230	DU ¹	5.86	0.44	0.07	0.37	0.52	0.35	0.17

Note 1: Occupied Dwelling Units

Figure 4.9-5 Proposed Project Trip Generation

Land Use	Measure	Daily	A.M. Peak Hour			P.M. Peak Hour		
			Total	In	Out	Total	In	Out
Vehicle Trips								
John Rieder Component "A" Residential Condominium/Townhouse ITE Code 230	60 MFDU ¹	352	26	4	22	31	21	10
Dana Levy Component "B" Single-Family Detached Housing ITE Code 210	104 SFDU ²	995	78	19	59	105	66	39
James Finch Component "C" Apartments ITE Code 220	46 MFDU ¹	309	23	5	18	29	19	10
James Finch Component "C" Single-Family Detached Housing ITE Code 210	139 SFDU ²	1,330	104	26	78	140	88	52
County of Ventura Component "D" Single-Family Detached Housing ITE Code 210	45 SFDU ²	431	34	9	25	46	29	17
Total Project Trips	394 DU	3,417	265	63	202	351	223	128

Note 1: Multi-Family Dwelling Units

Note 2: Single-Family Dwelling Units

As shown in Figure 4.9-5, the proposed projects are expected to generate approximately 3,417 daily vehicle trips. There are expected to be 265 trips in the A.M. peak hour, including 63 trips entering and 202 trips exiting the project sites. In the P.M. peak hour there are expected to be 351 trips, including 223 trips entering and 128 trips exiting the sites.

Trip distribution is the process of identifying the probable destinations, directions or traffic routes that will be utilized by project traffic. The potential interaction between the proposed land use and surrounding regional access routes are considered to identify the routes where the project traffic will distribute. Diagrams illustrating the anticipated trip distribution for the proposed projects are provided in Appendix 8.7.2.

Project-Generated Traffic Added to Existing Traffic Conditions

This section documents the existing traffic conditions with the addition of project-related traffic to the surrounding street system

Figure 4.9-6 describes the daily, peak hour and level of service for the three study street segments (SR 126, Main Street and Center Street)

Figure 4.9-6 Street Segment LOS (Existing Plus Project Conditions)

Street Segment	ADT Volume	A.M. Peak Hour Volume	P.M. Peak Hour Volume	Level of Service
State Highway				
SR-126	28,000	1,635	2,206	B
County Roadways				
Main Street	6,500	444	644	C
Center Street	1,000	91	84	A

As indicated by Figure 4.9-6, LOS at all three road segments operate at LOS C or better under Existing Conditions with Project.

Figure 4.9-7 and Figure 4.9-8 summarize the results of the LOS analyses for this scenario for A.M. peak hour and P.M. peak hour, respectively.

Figure 4.9-7 A.M. Peak Hour Intersection LOS Analysis (Existing Plus Project Conditions)

Intersection	Existing Without Projects	Existing With Projects	Increase/Decrease		Significant Impact?
			V/C or Delay	Number of Trips	
Signalized Intersections (LOS / V/C)					
SR-126 @ Main St.	A / .349	A / .455	.106	324	No
Unsignalized Intersections (LOS / Delay)					
Main St. @ Via Fustero.	A / 7.6	A / 8.1	0.5	130	No
Main St. @ Center St.	A / 7.3	A / 8.0	0.7	120	No
Main St. @ Orchard St.	A / 7.2	A / 7.2	0.0	3	No
Center St. @ Orchard St.	A / 9.0	A / 9.6	0.6	105	No
SR-126 @ Center St.	C / 19.6	C / 21.8	2.2	146	No
SR-126 @ Pacific Ave.	A / 0.0	C / 21.1	21.1	242	No

Note: LOS = Level of Service; V/C = Volume/Capacity; Delay in Seconds; Number of trips due to projects

Figure 4.9-8 P.M. Peak Hour Intersection LOS Analysis (Existing Plus Project Conditions)

Intersection	Existing Without Projects	Existing With Projects	Increase/Decrease		Significant Impact?
			V/C or Delay	Number of Trips	
Signalized Intersections (LOS / V/C)					
SR-126 @ Main St.	A / .415	A / .568	.153	391	No
Unsignalized Intersections (LOS / Delay)					
Main St. @ Via Fustero.	A / 7.8	A / 8.5	0.7	162	No
Main St. @ Center St.	A / 7.5	A / 8.1	0.6	155	No
Main St. @ Orchard St.	A / 7.4	A / 7.4	0.0	1	No
Center St. @ Orchard St.	A / 9.1	A / 9.8	0.7	137	No
SR-126 @ Center St.	D / 25.2	D / 30.0	4.8	162	No
SR-126 @ Pacific Ave.	B / 11.1	C / 22.7	11.6	271	No

Note: LOS = Level of Service; V/C = Volume/Capacity; Delay in Seconds; Number of trips due to projects

As shown in the above tables, traffic conditions at six of the seven study intersections will remain at LOS C or better in both the A.M. and P.M. peak hours with the addition of project-related traffic. One unsignalized intersection, SR-126 at Center Street, will operate at LOS D in the P.M. peak hour. This deficiency is due to southbound left turn volumes in the P.M. peak hour. While LOS D is acceptable by County standards for an intersection with a State Highway, the project would cause a significant increase in the volume to capacity ratio and the number of trips generated by the project exceeds 10 trips.

Cumulative Buildout Traffic Conditions (Without the Project)

This section documents buildout traffic conditions in the study area without the project, with ambient growth and cumulative project traffic added. The year 2020 was selected for analysis based on study requirements and available model data. Note that traffic from Rancho Temescal is addressed qualitatively, as this project will require its own traffic impact analysis.

Buildout Traffic Growth - Peak hour traffic volumes for Main Street, Center Street, and SR-126 under buildout (Year 2020) conditions were forecast based on traffic forecasts from the Ventura County Traffic Model (VCTM) when available. For those roadways not included in the model, including Orchard Street, Via Fustero, Pacific Avenue, and portions of Center Street, a 2% per year growth factor was used over existing conditions to forecast background traffic growth. Expected traffic generated by other developments that have been proposed in the study area was then added to the background traffic for those roadways not included in the model, to simulate 2020 Buildout Without Project conditions.

The County identified seven of these cumulative projects near the study projects sites which will add traffic to the intersections analyzed in the study. Figure 4.9-9 lists these cumulative projects that were analyzed as part of this study. These cumulative projects are estimated to generate 1,944 average daily trips at buildout (3,350 ADT if Rancho Temescal traffic is included). It is noted that traffic from planned expansion of the Lake Piru Recreation Area was included in the analysis, but that peak hours for recreation traffic are Friday P.M. and Sunday P.M. Therefore, this recreation project will not significantly affect the intersection level of service analysis for this study.

Figure 4.9-9 Cumulative Projects

Name	Use	Location
La Verne Nursery	45-employee wholesale plant nursery	West Camulos Street
Lake Piru Recreation Area	387 enhanced campsites and other recreational improvements	Piru Canyon
ABS & S Parcel Map	4 single-family units	North Main Street
Gaiser Enterprises Subdivision	16 single-family units	East Center Street
Finch Apartment Project	13 multi-family dwelling units	East Center Street
Cabrillo Farmworker Housing	35-70 family farm worker housing units	East Center Street
Piru Junction Retail Center	23,334 square foot retail commercial center	SR-126, west of Main Street
Commercial Town Center Mixed-Use Residential*	Up to 50 multi-family units	Within the Community Business District
<u>Rancho Temescal**</u>	<u>127 single-family dwelling units, 19 farmworker dwelling units, an elementary school and a park</u>	<u>Piru Canyon</u>

* Potential redevelopment pursuant to proposed Piru Area Plan policy 3.2.3-2

** The Rancho Temescal General Plan Screening application proposes construction of a new access road that will allow Piru Canyon traffic to exit to Highway 126 via Center Street, east of Piru Creek. For purposes of analysis, it is assumed that Rancho Temescal traffic will primarily use the new access road while Lake Piru Recreation Area traffic will continue to use Piru Canyon Road. However, a supplemental traffic analysis will be required for this project if and when the Board of Supervisors directs further study of this project at a General Plan screening hearing.

Peak Hour Intersection Level of Service

To simulate the buildout growth conditions for the year 2020, peak hour background traffic volumes were added to expected future traffic increases that may be generated by other developments that have been approved in the study area. Figure 4.9-10 illustrates the resulting buildout without project intersection LOS conditions. As shown in the table, five of the seven intersections are expected to operate at LOS C or better under buildout conditions for the year 2020. Of the two remaining intersections, SR-126 at Pacific Avenue (east) will operate at LOS E in the A.M. peak hour and LOS F in the P.M. peak hour, while SR-126 at Center Street will operate at LOS E in the P.M. peak hour.

Thus these two intersections are projected to exceed the County's acceptable LOS standard under cumulative conditions, without the project. Development of the Rancho Temescal project will add an additional 1,407 ADT to east Center Street. This is expected to cause the intersection of Center Street and Highway 126 to fall below the County's acceptable level of service for both the A.M. and the P.M. peak periods for the buildout without project condition.

This section documents the buildout conditions with the addition of project-related traffic to the surrounding street system. It evaluates buildout traffic conditions in the study area with ambient growth added and with traffic from the proposed project and nearby cumulative projects added.

Figure 4.9-10 Peak Hour Intersection Conditions (2020 Build-out Without Project Conditions)

Intersection	A.M. Peak Hour		P.M. Peak Hour	
	Volume/Capacity or Delay	LOS	Volume/Capacity Or Delay	LOS
Signalized Intersections				
SR-126 @ Main St.	.543	A	.622	B
Unsignalized Intersections				
Main St. @ Via Fustero.	8.6	A	9.6	A
Main St. @ Center St.	8.8	A	9.0	A
Main St. @ Orchard St.	7.2	A	7.5	A
Center St. @ Orchard St.	10.5	B	10.2	B
SR-126 @ Center St. ⁷	22.1	C	42.8	E
SR-126 @ Pacific Ave. (east)	43.8	E	52.3	F

Note: Volume/Capacity shown for signalized intersections; Average delay shown for unsignalized intersections

Project-Generated Traffic Added to Cumulative Buildout Traffic

Street Segment Level of Service – Figure 4.9-11 provides daily and peak hour volumes and a street segment level of service analysis for the three study street segments for the Buildout Plus Project scenario.

Figure 4.9-11 Street Segment Level of Service (2020 Build-out Plus Project)

Street Segment	ADT Volume	A.M. Peak Hour Volume	P.M. Peak Hour Volume	Level of Service
State Highway				
SR-126	30,000	2,234	3,019	B
County Roadways				
Main Street	10,000	764	1,031	C
Center Street ^b	1,500	155	137	A

As shown on Figure 4.9-11, level of service on all three of the study street segments operate at LOS C or better under Buildout Plus Project conditions. Note that the addition of traffic from Rancho Temescal would increase the ADT volume of Center Street by an additional 1,407 ADT, but that this would not exceed the County's adopted level of service for this road segment.

Peak Hour Intersection Level of Service – Figure 4.9-12 and Figure 4.9-13 summarize the results of the LOS analyses for the A.M. and P.M. peak traffic conditions.

As shown in the tables below, traffic conditions at five of the seven study intersections will remain at LOS C or better in both the A.M. and P.M. peak hours with the addition of project-related traffic. The

⁷ Excludes Rancho Temescal traffic
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unsignalized intersection of SR-126 at Center Street will worsen to LOS F in the P.M. peak hour. The poor reported LOS is a result of a very low number of vehicles making a southbound left-turn from Center Street to eastbound SR-126. The intersection of SR-126 at Pacific Avenue (east) will operate at LOS E for both the A.M. and P.M. peak hours. Thus, these two intersections will operate at unacceptable LOS per County standards. This is considered a significant cumulative impact. Development of the Rancho Temescal project will add an additional 1,407 ADT to east Center Street. This is expected to cause the intersection of Center Street and Highway 126 to fall below the County's acceptable level of service for both the A.M. and the P.M. peak periods for the project generated traffic added to cumulative buildout condition.

Figure 4.9-12 A.M. Peak Hour Intersection LOS Analysis (2020 Build-out Plus Project)

Intersection	Existing	Buildout Without Project	Buildout With Project	Increase/ Decrease		Significant Impact?
				V/C or Delay	Number of Trips	
Signalized Intersections (LOS / V/C)						
SR-126 @ Main St.	A / .349	A / .543	B / .608	.065	324	No
Unsignalized Intersections (LOS / Delay)						
Main St. @ Via Fustero.	A / 7.6	A / 8.6	A / 8.8	0.2	130	No
Main St. @ Center St.	A / 7.3	A / 8.8	A / 8.9	0.1	120	No
Main St. @ Orchard St.	A / 7.2	A / 7.2	A / 7.2	0.0	3	No
Center St. @ Orchard St.	A / 9.0	A / 10.5	B / 10.6	0.1	105	No
SR-126 @ Center St.	C / 19.6	C / 22.1	C / 23.4	1.3	146	No
SR-126 @ Pacific Ave.	A / 0.0	E / 43.8	E / 40.0	-3.8	242	Yes

Note: LOS = Level of Service; V/C = Volume/Capacity; Delay in Seconds; Number of trips due to projects

Figure 4.9-13 P.M. Peak Hour Intersection LOS Analysis (2020 Build-out Plus Project)

Figure 4.9-13 P.M. Peak Hour Intersection LOS Analysis (2020 Build-out Plus Project)

Intersection	Existing	Buildout Without Project	Buildout With Project	Increase/Decrease		Significant Impact?
				V/C or Delay	Number of Trips	
Signalized Intersections (LOS / V/C)						
SR-126 @ Main St.	A / .415	B / .622	C / .714	.092	391	No
Unsignalized Intersections (LOS / Delay)						
Main St. @ Via Fustero.	A / 7.8	A / 9.6	A / 9.8	0.2	162	No
Main St. @ Center St.	A / 7.5	A / 9.0	A / 9.2	0.2	155	No
Main St. @ Orchard St.	A / 7.4	A / 7.5	A / 7.5	0.0	1	No
Center St. @ Orchard St.	A / 9.1	B / 10.2	B / 10.3	0.1	137	No
SR-126 @ Center St.	D / 25.2	E / 42.8	F / 50.1	7.3	162	Yes
SR-126 @ Pacific Ave.	B / 11.1	F / 52.3	E / 46.1	-6.2	271	Yes

Note: LOS = Level of Service; V/C = Volume/Capacity; Delay In Seconds; Number of trips due to projects

Safety/Design Impacts

Project Internal Circulation Issues/Impacts

John Rieder (Component A) Internal Circulation - The component A site plan was reviewed for internal circulation. The width of the access drive is adequate for vehicles to easily enter and exit the project. Curb radii are sufficient for emergency vehicle access. The interior streets are 25 feet in width. These streets have adequate space for vehicles to pass each other but not to allow for curbside parking on the street.

Dana Levy (Component B) Internal Circulation - The component B site plan was reviewed for internal circulation. The width of the access drive is adequate for vehicles to easily enter and exit the project. Curb radii are sufficient for emergency vehicle access. The interior streets have adequate width for vehicles to pass each other but not to allow for curbside parking on the street. The lack of adequate on-street parking is considered a significant adverse impact.

James Finch (Component C) and County of Ventura (Component D) Internal Circulation - The Component C and Component D site plans were not available for review.

Cumulative Safety/Design Impacts

The buildout of the proposed project will cumulatively add traffic to Piru roads and intersections where the consultant identified existing safety and/or design concerns (See discussion in Section 4.9.1 regarding Safety and Design of Public and Private Roads). The added traffic will exacerbate the existing safety problems and the need for design improvements for these roads and intersections. Therefore the project is considered to have a cumulative significant impact on the safety and design of the roads and intersections identified therein.

Pedestrian and Bicycle Pathway Impacts

Pedestrian walkways would be provided on site for all of the project components as a requirement of the County Subdivision Ordinance. However, project residents need to be able to safely walk or ride bicycles to Piru School, Warring Park and the historic commercial town center. Gaps in the sidewalks currently exist along Main Street and Center Street. Most of these gaps will be addressed as a result of sidewalk improvements planned by the RDA. However the RDA project will not construct sidewalks on the west side of Main Street south of Camulos Street. The lack of a safe route to school (etc.) is considered to be a significant project impact.

An existing bicycle pathway exists along the railroad right-of-way between Main Street and Warring Park. The County plans to construct a bicycle pathway which would extend from the Piru Community along the railroad right-of-way to Rancho Camulos several miles east of Piru. Recommended Piru Area plan policy 4.1.2-7 would require the applicants to fund construction of a bicycle pathway along both sides of south Main Street. This pathway would connect to the existing railroad bicycle pathway. Additionally, the Recreation chapter recommends mitigation that would require the applicants to fund construction of 3.1 miles of bicycle pathway to address trail deficiency in the Piru area. With these measures, project and cumulative impacts on bicycle pathways would be less than significant.

Bus Transit Impacts

The proposed project will result in a 78% increase in the size of the Piru Community. This increase in population is expected to increase demand for public transit. Additionally, the development of nearby Newhall Ranch in the near future is expected to increase demand for transit service in the Piru Community. However, the air quality chapter requires the applicant to provide bus turnouts and bus shelters and pay TDM fees which are expected to be used to fund extension of public transit services to the Piru Community. With these mitigations in place, project impacts associated with an increase in demand for bus service would be reduced to less than significant.

Relevant Plans and Policies

General Plan Policies

The General Plan transportation goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the exception of the following:

Policy 4.2.2-1 *County thoroughfares and County maintained local roads shall be designed and constructed in accordance with County Road Standards or better [...]*

Policy 4.2.2-3 *The minimum acceptable Level of Service (LOS) for road segments and intersections within the Regional Road Network and Local Road Network shall be as follows:*

(a) *LOS-'D' for all County thoroughfares and Federal highways and State highways in the unincorporated area of the County, except as otherwise provided in subparagraph (b); [...]*

(c) *LOS-'C' for all County-maintained local roads; [...]*

At any intersection between two roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the two shall be the minimum acceptable LOS for that intersection.

Policy 4.2.2-4 *[...] County General Plan land use designation changes and zone changes shall be evaluated for their individual and cumulative impacts, and discretionary development shall be evaluated for its individual impact, on existing and future roads, with special emphasis on the following:*

(a) *Whether the project would cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable LOS to function below an acceptable LOS;*

(b) *Whether the project would add traffic to existing roads within the Regional Road Network or the Local Road Network that are currently functioning below an acceptable LOS; and*

(c) *Whether the project could cause future roads planned for addition to the Regional Road Network or the Local Road Network to function below an acceptable LOS.*

Policy 4.2.2-5 *[...] County General Plan land use designation changes and zone changes that would cumulatively cause any of the impacts identified in subparagraphs (a) through (c) of Policy 4.2.2-4 shall be prohibited unless the Board of Supervisors adopts a Statement of Overriding Consideration. County General Plan land use designation changes, zone changes and discretionary development that would individually cause any of the impacts identified in subparagraphs (a) through (c) of Policy 4.2.2-4 shall be prohibited unless feasible mitigation measures are adopted that would ensure that the impact does not occur or unless a project completion schedule and full funding commitment for road improvements are adopted which ensure that the impact will be eliminated within a reasonable period of time. [...]*

Policy 4.2.2-9 *Discretionary development shall be conditioned, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.*

These policies are in support of the following goals:

Goal 4.2.1-3 *Ensure that as discretionary development creates the need, existing roads within the Regional Road Network and Local Road Network are improved, and additional roads needed to complement the Regional Road Network and Local Road Network are constructed, so as to keep all such roads safe and functioning at an acceptable LOS.*

- Goal 4.2.1-4 *Ensure that development which would contribute to the cumulative need for improvements or additions to the Regional Road Network bears its pro-rata share of the costs of all such improvements or additions.*
- Goal 4.2.1-6 *Promote the development of a safe, efficient, convenient and economical community, intercommunity and countywide bus transit system.*
- Goal 4.2.1-8 *Encourage the use of bicycling and ridesharing (e.g., carpooling, vanpooling, and bus pooling) as a percentage of total employee commute trips throughout the County in order to reduce vehicular trips and miles traveled and consequently vehicular emissions, traffic congestion, energy usage, and ambient noise levels.*

The project will have significant project and/or cumulative traffic LOS impacts at the intersections of SR-126 at Pacific Avenue (east) and SR-126 at Center Street. The EIR recommends that the applicants be required to pay a prorated share of the cost of mitigating these deficiencies. Therefore, with mitigation the project will be consistent with General Plan policies 4.2.2-3, 4.2.2-4 and 4.2.2-5.

The proposed project would not promote transit or bicycle usage, however, the Air Quality and Recreation chapters, recommended mitigation that would require the applicants to provide bus turnouts and construct bicycle/pedestrian pathways along Main Street and within the projects. Therefore, as mitigated the project will be consistent with General Plan policy 4.2.2-9

The Rieder component will utilize private driveways internally. The Levy component would utilize public roadways that are not consistent with the County Road standards. Proposed mitigation in the Community Character chapter would require the Levy project to provide parkways as required by the Piru Area Plan and redesign road to comply with obtain a deviation from the applicable County Road Standards or the Fire Protection District's Private Road Standards for any roads which do not meet the County standard. ~~If deviations from the County Road standards cannot be obtained, the roads would have to be constructed to be consistent with the County Road Standards.~~ Therefore, with mitigation as proposed, the project would be consistent with General Plan Policy 4.2.2-1.

The proposed Piru Area Plan revision includes a policy that would require the applicants to provide a bicycle/pedestrian pathway along Main Street. Additionally, the Recreation chapter recommends mitigation that would require the applicants to provide funding for at least 3.6 miles of class I bicycle pathway within the Piru Community. Therefore the project, as mitigated would be consistent with General Plan policy 4.2.2-9

The Piru Area Plan transportation goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

- Policy 4.1.2-3 For street improvements within Urban and Existing Community designated areas [...] the following apply:
 - a. Residential and Community Facility Designations

Public street improvements adjacent to Residential and Community Facility designations, with the exception of Center Street which is to be consistent with Section 4.1.2-3b, below, shall be constructed in accordance with County of Ventura Public Works Agency Plate B-4 A (Residential Roads, Urban with Parkways) as it existed in the County Road Standards on January 28, 1986. [...]
- Policy 4.1.2-4 All discretionary development shall be conditioned to provide street and sidewalk improvements as indicated in policy 4.1.2-3, and in accordance with the Ventura County Design Criteria and Specifications for Landscape Plans and Recommended Street Tree List established by the Public Works Agency. With regard to those improvements indicated under policy 4.1.2-3a, a landscape maintenance entity, subject to the approval of the Public Works Agency, shall be established prior to Final Map Recordation or Zoning Clearance.

Policy 4.1.2-5 Discretionary development shall be planned to facilitate pedestrian, bicycle, transit, as well as automobile access, both within and outside the development.

These policies are in support of the following goals:

Goal 4.1.1-3 Provide safe pedestrian and bicycle pathways throughout the Community.

Goal 4.1.1-4 Distribute the cost of circulation improvements equitably among benefiting property owners and users.

As discussed in response to General Plan policy 4.2.1-7 above, the Air Quality and Recreation chapters recommend mitigation that would require the applicants to provide bicycle pathways along Main Street and within the proposed subdivisions and provide a bus turnout to facilitate public transit.. The Transportation and Circulation chapter recommends mitigation that would require each applicant to pay his prorated share of the cost of needed circulation improvements in the Piru Community. Therefore, with mitigation as recommended, the project will be consistent with Piru Area Plan policy 4.1.2-5.

The proposed Levy subdivision proposes monolithic sidewalks which would be inconsistent with Piru Area Plan policies 4.1.2-3 and 4.1.2-4. However mitigation recommended within the Community Character chapter would require that landscaped parkways be provided. Therefore, as mitigated the project would be consistent with Piru Area Plan policies 4.1.2-3 and 4.1.2-4.

4.9.3 Mitigation Measures

Mitigation for Level of Service Impacts on Public Roads:

Project-generated traffic added to year 2020 cumulative buildout traffic will cause the intersections of SR-126 at Pacific Avenue (east) and SR-126 at Center Street to operate at an unacceptable LOS. To mitigate this impact the following measures are recommended:

- T-1** To improve intersection conditions at SR-126 at Pacific Avenue (east), the following traffic mitigation measures shall be implemented (See Figure 4.9-14): Install raised median, channelizers, and extension striping shall be installed to prevent left-turns from Pacific Avenue (east) (See Figure 4.9-14). This mitigation shall not be implemented until roads in Component C have been constructed and provide an alternate route for residents living on Pacific Avenue to access Main Street and the intersection improvements at Main Street and Highway 126 (Measures T-3 and CC-2) have been completed.
- T-2** To improve conditions at the intersection of SR-126 at Center Street, the following traffic mitigation measures shall be implemented: Install a raised channelizers island and extension striping on Center Street at SR-126, shall be installed to preventing left-turns from Center Street to eastbound SR-126 (See Figure 4.9-15). This measure shall also include installation of additional signage directing eastbound traffic to use Main Street. This measure shall not be implemented until the intersection improvements at Main Street and Highway 126 (Measures T-3 and CC-2) have been completed.

Note that any improvements to Highway 126 will require an encroachment permit from the California Department of Transportation. Note also that the addition of traffic from Rancho Temescal may require installation of a traffic signal at the intersection of Center Street and Highway 126. Installation of a traffic signal would be the responsibility of the proponent of the Rancho Temescal project. Thus, if Rancho Temescal development is approved, Measure T-2 may be unnecessary.

Recommended Mitigation for Safety Design of Public and Private Streets:

To address safety concerns of the project-generated traffic added to year 2020 cumulative build-out traffic within the Piru Community, the following measures shall be implemented:

Figure 4.9-14 SR-126 & Pacific Avenue Concepts

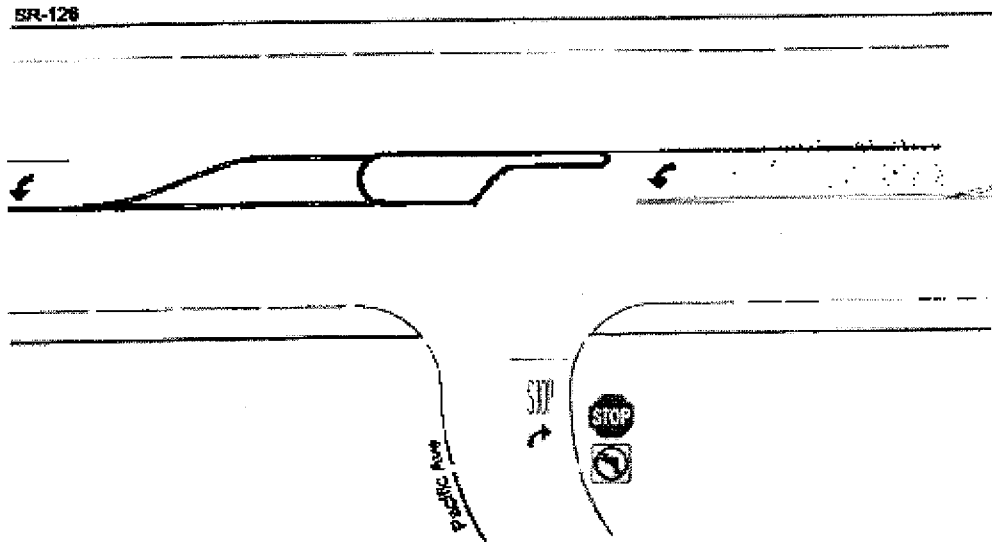
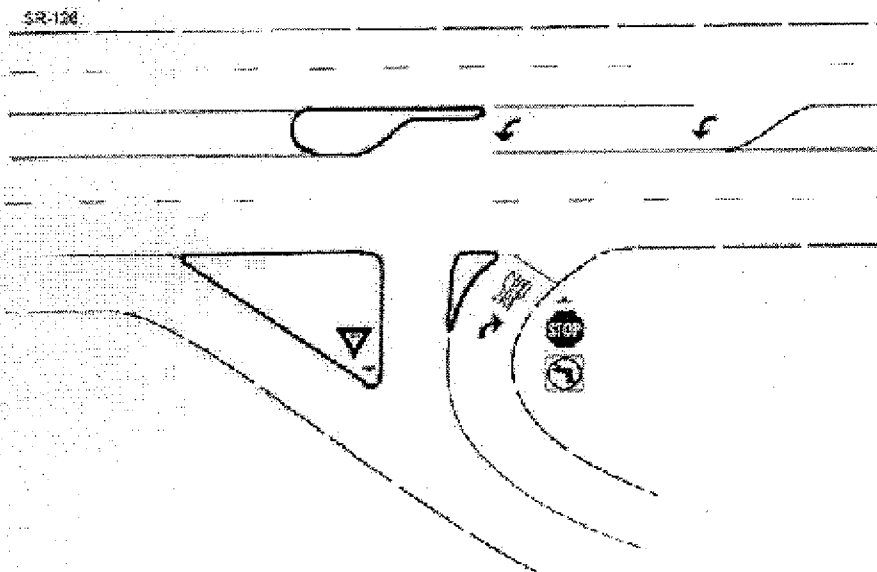


Figure 4.9-15 SR-126 & Center Street Concept



Traffic and Pedestrian Safety at the Intersection of Main Street at SR-126:

- T-3**
- Improve signal-phasing, provide longer mast arms and new left-turn signal heads, provide new signal timing software;
 - Lengthen left-turn storage capacity on eastbound SR-126 (minimum of 260 feet);
 - Provide a dedicated ~~Lengthen left-turn lane storage capacity~~ on southbound Main Street (minimum of 200 feet) and provide new left-turn signal phasing and new left-turn mast head;
 - Provide a westbound right-turn deceleration lane from westbound SR-126 at Main Street; and
 - Provide pedestrian signal heads, American Disabilities Act compliant safe refuge areas at the corners, zebra-striped crosswalks, pushbuttons and new signal timing software at the intersection of SR-126 at Main Street.

Note that any improvements to Highway 126 will require an encroachment permit from the California Department of Transportation.

Traffic and Pedestrian Safety on Main Street:

- T-4**
- Provide Zebra-stripe crosswalks at new Main Street intersections within the Piru Expansion Area (project applicants only, part of Enhanced Main Street Concept);

Traffic Safety at the Intersection of Main Street at Via Fustero⁸ (see Figure 4.9-16):

- T-5**
- Provide a traffic calming entry island on Main Street, south of Via Fustero;
 - Provide Zebra-stripe crosswalks across Via Fustero; and
 - Replace the existing wooden barrier south of Via Fustero with standard curbing to provide protection for a building column that encroaches upon the existing roadway.

Traffic Safety on Piru Canyon Road:

- T-6** Provide an advanced speed warning sign (25 MPH ZONE AHEAD) for southbound Piru Canyon Road as it approaches the developed area of Piru.

Traffic Safety at the Intersection of Main Street at Center Street:

- T-7** Provide ~~traffic-calming curb extensions with zebra-striped sidewalks.~~

Traffic Safety at the Intersection of Center Street at SR-126:

- T-8** Provide a westbound right-turn deceleration lane from SR-126 to Center Street.

Traffic Safety at the Intersection of Center Street at Orchard Street:

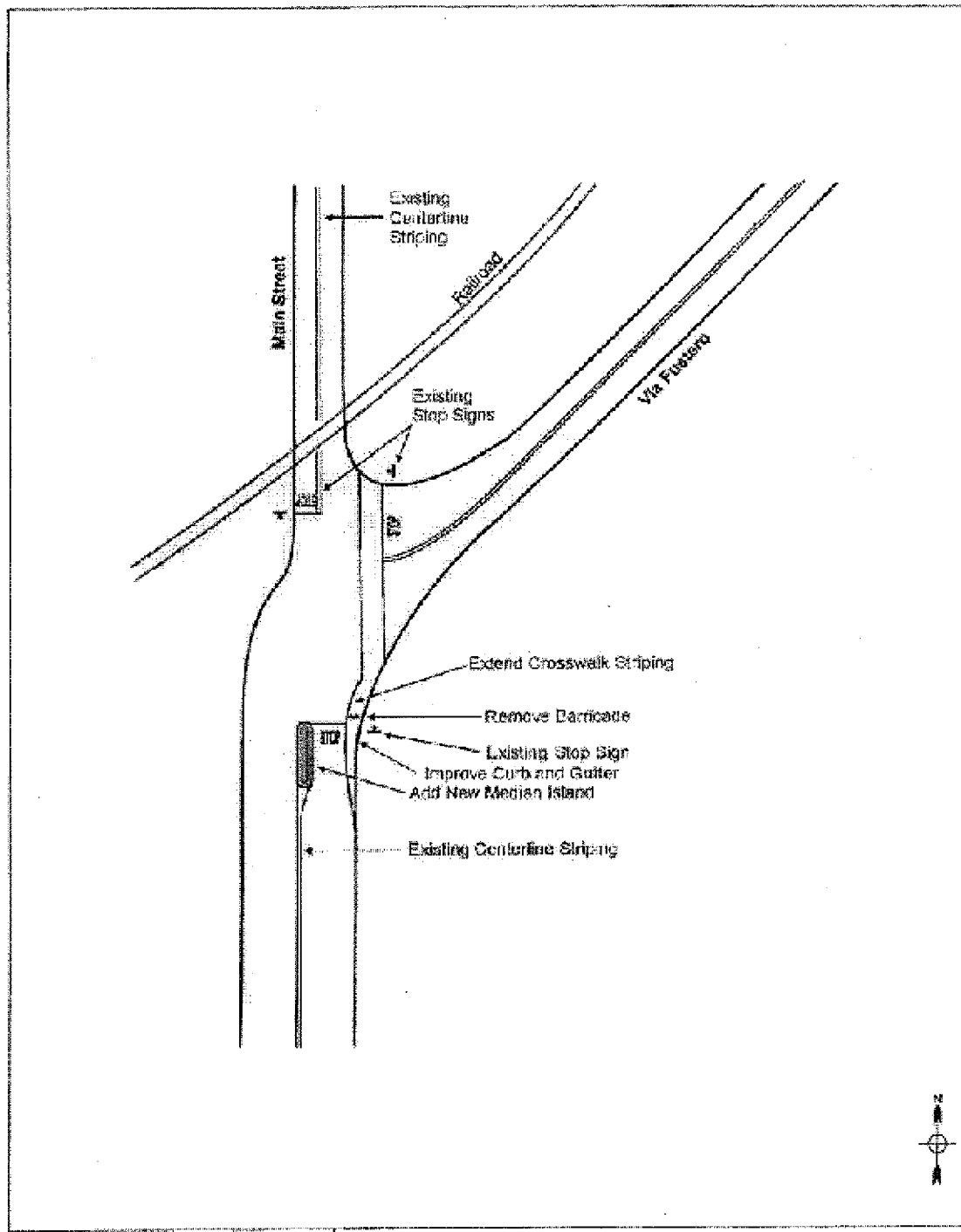
- T-9** Provide traffic-calming curb extensions with bold crosswalk markings, a new street lamp and pedestrian crossing signs (see Figure 4.9-17).

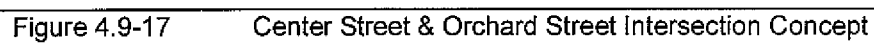
Traffic Safety on Center Street between Piru Creek Bridge and SR-126:

- T-10** Conduct engineering and traffic survey for Center Street, between Piru Creek Bridge and SR-126, and install new 35 mph speed limit signs, if warranted.

⁸ The traffic consultant initially recommended roundabouts be provided at the intersection of Main Street at Via Fustero, Main Street at Orchard Street and Via Fustero at Center Street to calm traffic before it enters the heart of the Piru and bulb-outs at Main and Center Streets and Orchard and Center Street. However, these measures were rejected by the Piru Neighborhood Council. Alternative traffic calming measures are suggested in measures T-5, T-6 and T-9.

Figure 4.9-16 Main Street & Via Fustero Intersection Concept





The above measures, in addition to improving the safety of roads in the Piru area, will provide improved access to Main Street and SR-126 from the project area and will improve traffic and pedestrian safety within the Piru Community. The recommended improvements on Main Street should result in additional traffic being routed via the intersection of SR-126 at Main Street, thus improving conditions at the intersection of SR-126 at Center Street as well. The total cost of the above improvements is estimated at \$698,118 ~~\$490,348~~ (see Table A-5 in Appendix 8.7.3). To allocate the fair share cost of these measures to cumulative development and to ensure that adequate funds will be available to fully fund the recommended improvements, the following measure is recommended:

Piru Traffic Impact Mitigation Fee (TIMF) Augmentation:

- T-11** Prior to recordation of any tract map within the Piru Expansion Area, the Public Works Agency shall prepare an amendment to the County's Traffic Impact Mitigation Fee Ordinance for the Piru Area of Interest (or prepare a separate ordinance) that would collect fees for the improvements listed in the above measures (T-1 to T-3, T-5 to T-10 and T-16). Public Work's staff costs for processing this ordinance/amendment shall be fully funded by the applicants.

The recommended Piru TIMF fee augmentation is based upon daily traffic generated by the proposed and cumulative development projects and the fair share improvement costs allocated to them. The recommended TIMF trip fee calculations and related information on the proposed TIMF augmentation program is found in Appendix 8.74. The recommended TIMF augmentation fee is \$129.20 ~~\$143.20~~⁹ per trip generated. This translates to about \$757 per multi-family dwelling unit and \$1,236 per single-family dwelling unit, or less than half of one percent of the expected sales price of the proposed dwelling units. Note that if the Rancho Temescal Project is approved, the TIMF fee may be substantially reduced (See Table A-7 in Appendix 8.7.4.)

The traffic consultant has identified internal circulation issues with respect to the Rieder and Levy components. To mitigate these project impacts the following measures are recommended:

Internal Circulation – Rieder Component:

- T-12** Curbside parking shall be prohibited on internal streets in order to allow adequate space for vehicles to pass each other and emergency vehicle access.

Internal Circulation - Levy Component:

- T-13** ~~Curbside parking shall be prohibited on Internal streets "A", "C", "D" and "G" shall be redesigned to comply with the applicable County Road Standards for the Piru Community or the Fire Protection District's Private Road Guidelines. Additional guest parking of at least one space for each two units shall be provided within the subdivision.~~

Piru School Safety and Circulation Issues:

- T-14** In order to ensure a safe pathway from the proposed development to Piru School, the ~~following measure is recommended:~~ new curb, gutter and a bicycle/pedestrian pathway shall be installed continuously from the Piru Expansion Area to connect with existing improvements north of the railroad tracks. Such improvements shall be bonded for prior to issuance of a zoning clearance for residential construction, and improvements shall be completed prior to issuance of occupancy permits for residential development.

With respect to properties not under the control of any of the applicants, the applicants shall make a written offer to construct the above improvements. If the offer is rejected, and the County is not willing to use its power of eminent domain, applicants will have no other obligation regarding this measure.

Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the estimated number of elementary students generated by each

⁹ The recommended TIMF fee could be reduced to ~~\$76.33~~ \$97.33 per ADT, if State funds are available for the safety improvements planned at the intersection of Main Street and Highway 126. The project is on the 2006/2007 FY waiting list.
Final Environmental Impact Report for Focused Piru Area Plan Update Transportation and Circulation

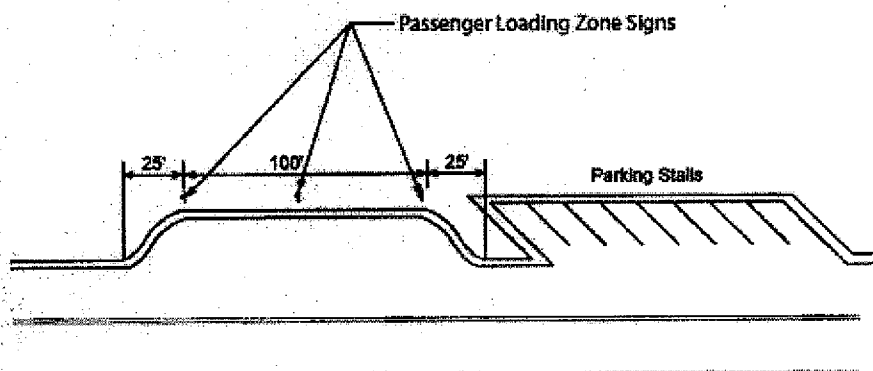
project component. (Component A: 32 = 15.21%, Component B: 56 = 26.36%, Component C: 99 = 46.90%, and Component D: 24 = 11.53%).

T-15 In order to improve vehicular circulation and student drop-off at Piru School, the following measure is recommended:

Prior to recordation of any tract map in the Piru Expansion Area, applicants shall pay a fee to the Fillmore Unified School District to cover the applicant's share of the cost to construct student drop-off and parking improvements at Piru School.

One possible design for a student drop-off area is illustrated in Figure 4.9-18. The estimated cost of this improvement is \$220,000. The calculation of the applicant's fair share fee is provided in Table A-6 in Appendix 8.7.3. Alternatively, if the cost of Measure T-15 is added to the TIMF fee described in Measure T-11 above, this would increase the recommended TIMF by \$38.51 from \$85.82 to \$184.71 per daily vehicle trip. The cost of Measure T-15 is estimated at \$228 per multi-family dwelling unit and \$369 per single-family dwelling unit.

Figure 4.9-18 Piru School Student Drop-Off Concept

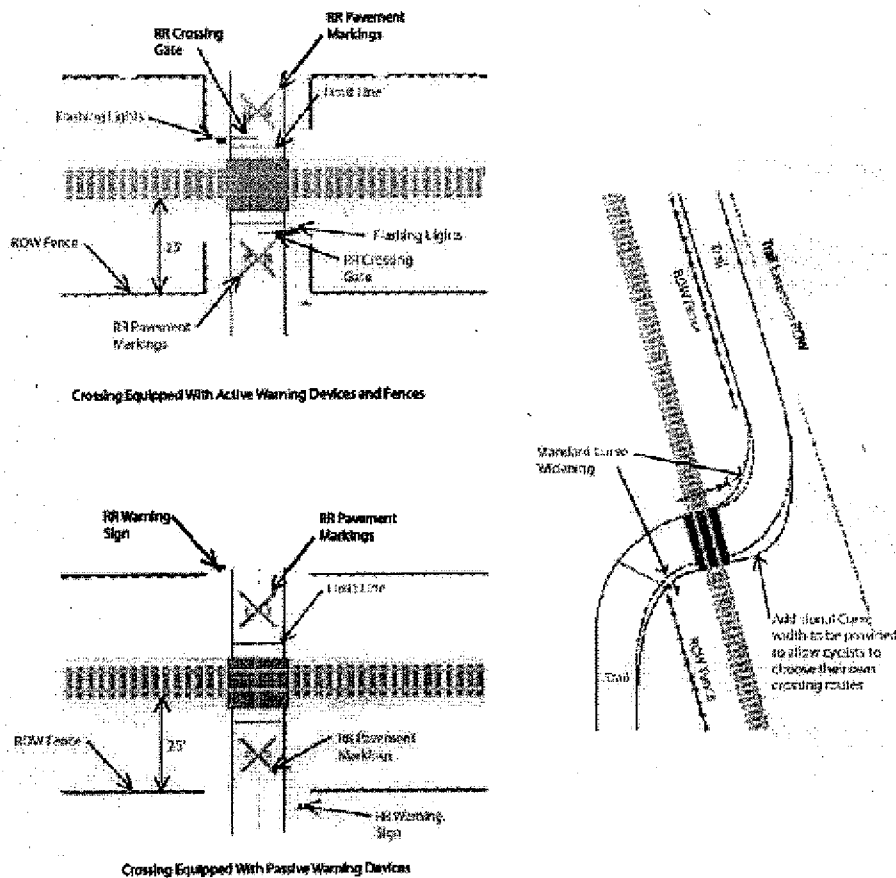


Recommended Mitigation of Pedestrian/Bicycle Pathway Issues:

Requirements to provide additional Pedestrian/Bicycle pathways are included in the Recreation Chapter. No additional mitigation is required. Nonetheless, the traffic consultant evaluated safety and design issues associated with pedestrian and bicycle pathway issues. The following recommendations should guide development of pathways required by Mitigation Measures AQ-2(a)(1), T-14, R-4 and CC-2:

- The traffic consultant recommends the bicycle/pedestrian pathway should be a minimum of 10 feet wide to accommodate multiple users in both directions. In rural areas such as the outskirts of Piru, the pathway may be reduced to 8 feet in width.
- The pathway must be clearly separated from any parallel roadway by a minimum five foot parkway or railing, fence or other barrier at least 42 inches high or as otherwise determined by the County after consideration of available right-of-way and other issues.
- Special precautions must be taken when the pathway crosses the railroad tracks. Pathways should cross railroads at a 90 degree angle. The crossing surface should be concrete or slip resistant rubberized material.
- ~~Prior to re-establishment of train service,~~ Pedestrian warning treatments should be used at the railroad crossing to ensure the safety of pedestrians and cyclists. These treatments include at minimum, an advance warning sign, railroad pavement markings and a clearly marked limit line. If the railroad crossing is heavily used by pedestrians on a daily basis or is located along a school walking route, it is recommended that the crossing be designed to include the crossbuck sign, flashing light signals and automatic gates (see Figure 4.9-19).

Figure 4.9-19 Pedestrian Pathway Railroad Crossings Concept



- Bicycle/pedestrian conflicts with truck traffic entering and exiting the Fillmore-Piru Citrus Association packing plant can pose a safety hazard. The bicycle/pedestrian pathway should include pavement markings and signage to alert both pathway users and packing plant workers.

Recommended Mitigation for Bus Transit Issues

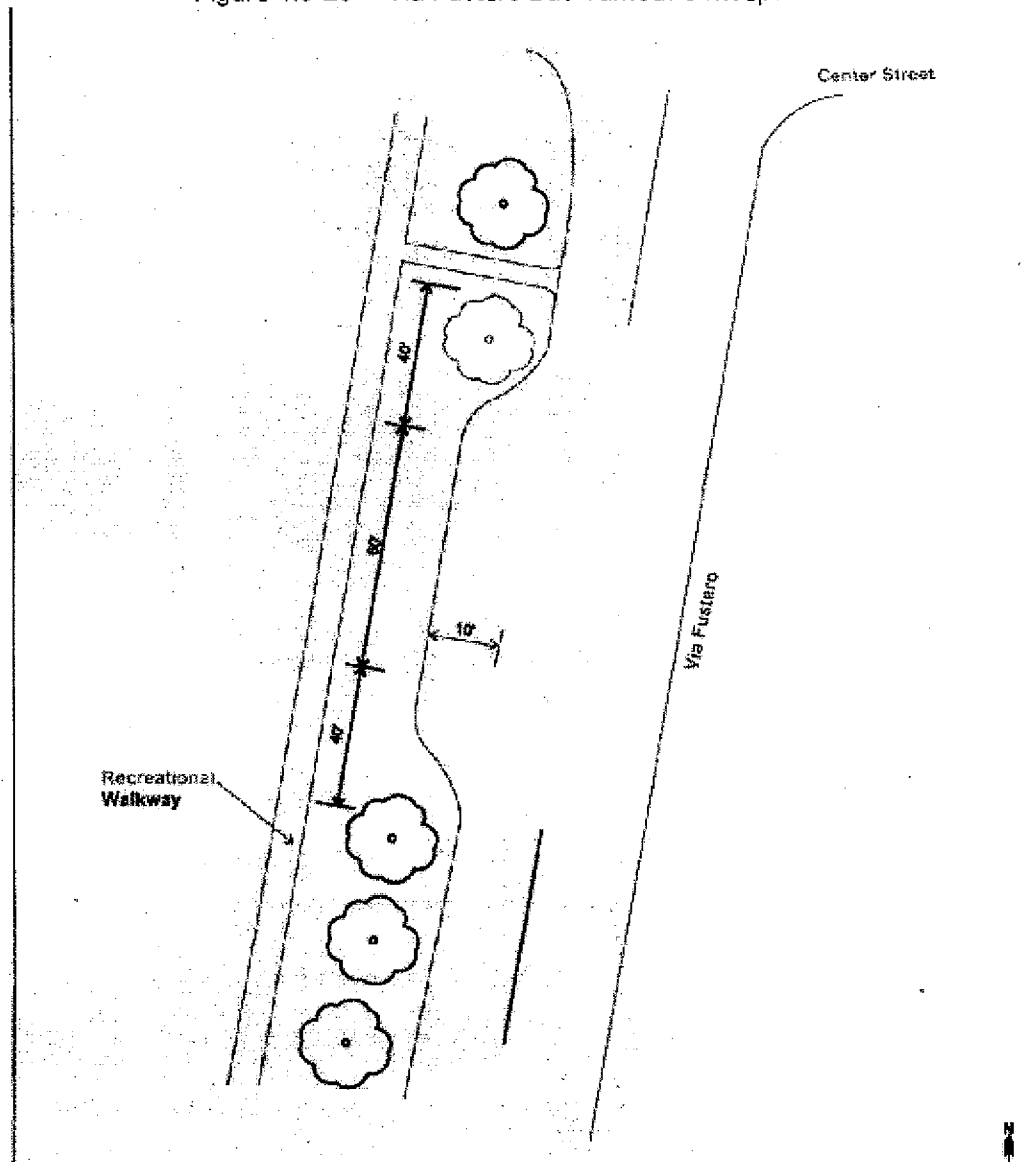
Requirements to provide on-site bus turnouts, bus shelters and payment of an air quality mitigation fee that would fund additional community bus service are included in the air quality chapter. Additionally, the traffic consultant recommends the following measure:

T-16 Provide an additional bus turnout/shelter at Via Fustero, opposite Piru Town Square and the train station.

Funds for this measure will can be provided by the TIMF augmentation (Measure T-11) Air Quality Mitigation Fee. A conceptual design for this additional bus stop is illustrated in Figure 4.9-20.

Additionally, ~~the traffic consultant evaluated bus routing and various bus standards and makes the following recommendations:~~

Figure 4.9-20 Via Fustero Bus Turnout Concept



The Traffic consultant reviewed existing roadways and turning radii within the town of Piru and recommends that the bus route should be via SR-126 to Main Street, Main Street to Via Fustero, and Via Fustero to Center Street. If the Via Fustero/Center Street intersection is improved with a roundabout, the bus could turn around and travel Via Fustero and Main Street back to Highway 126. However, the Piru Neighborhood Council has indicated they do not support the use of roundabouts at this location. Alternatively, the bus could turn right at Center Street, turn around at the proposed Center Street farmworker housing site and return to Highway 126 by way of Center Street to Via Fustero to Main Street. It is noted that existing turning radii at the intersection of Main Street at Center Street are inadequate for large busses to use this route without encroachment into the opposing lane of traffic.

A minimum 50-foot turning radius is required to ensure that large buses can negotiate Piru streets without encroachment into opposing lanes. Parking setbacks are also required and necessary to reduce potential conflicts between buses and parked vehicles, and to ensure that the turning radii are

sufficient for bus clearance. A 60-foot no-parking setback for the approach lane and a 40-foot setback for the departure lane are recommended. A minimum 12-foot lane width is adequate to ensure proper maneuverability and clearance for the buses. Curb parking requires an additional 8 feet. A minimum 10-foot width is required for any bus turnouts provided. It should also be noted that any overhead obstructions such as trees and utility wiring must be at least 12 feet above the road surface, and there must be a minimum 2-foot clearance on each side of the roadway.

The roadway surface to be used by large buses must accommodate bus axle loads of up to 25,000 pounds. A concrete surface is highly recommended for locations where the buses would start, stop, or turn. Typically these locations would be at bus turnouts and turnarounds.

The critical dimensions for large buses are the length (typically about 40 feet), width (typically about 8 feet 6 inches), and the height (varies, but typically about 11 feet).

Recommended Mitigation for Regional Cumulative Traffic Impacts

T-17 To address cumulative impacts of traffic on the Regional Road Network, Ventura County Traffic Impact Mitigation Fee Ordinance 4246 and General Plan Policy 4.22 require that the Transportation Department of the Public Works Agency collect the Traffic Impact Mitigation Fee (TIMF) for the Piru District.

The current TIMF for the Piru District is \$14.99 per ADT and would be in addition to the TIMF augmentation fee described in Measure T-11.

4.9.4 Residual Impacts

Level of Service - The mitigation measures listed above will accommodate expected traffic increases while maintaining an adequate level of service at these intersections. The Buildout with mitigation scenarios assume that these improvements of the study intersections have been implemented. Figure 4.9-21 shows the project impacts if the intersections are improved as recommended. As shown in the table, the intersections will operate at acceptable levels of service if the proposed improvements are implemented.

Implementation of the recommended mitigation measures will mitigate to a less-than-significant level all identified transportation and circulation impacts with respect to level of service for public roads, safety & design of public and private roads, pedestrian & bicycle facilities and bus transit. No significant residual impacts would occur.

Figure 4.9-21 LOS Analysis of year 2020 Build-out Plus Project Conditions After Mitigation

<i>Intersection</i>	Existing	Build-out Without Project	Build-out With Project	Mitigation With Project	Increase/ Decrease	Significant Impact?
Weekday Peak Hour, Signalized Intersection LOS / V/C						
SR-126 @ Main St. ¹	A / .415	B / .622	C / .714	C / .725	0.01	No
Weekday Peak Hour, Unsignalized Intersection (LOS or Delay)						
SR-126 @ Pacific Ave. ¹	B / 11.1	F / 52.3	E / 46.1	B / 13.7	- 38.6	No
SR-126 @ Center St. ¹	D / 25.2	E / 42.8	F / 50.1	B / 13.4	- 29.4	No

Note 1: PM peak hour delay shown.

4.10 Groundwater Quantity and Water Supply Distribution

Groundwater Quantity: This chapter evaluates the project's impact with respect to depletion of groundwater within the Piru groundwater basin and downstream groundwater basins/aquifers.

The Ventura County Initial Study Guidelines provides the following threshold criteria for determining significance with respect to groundwater quantity:

1. Any land use that will directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a basin that is overdrafted, shall be considered to have a potentially significant impact.
2. In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, net groundwater extraction that will individually or cumulatively cause the basin(s) to become overdrafted, shall be considered to have a potentially significant impact.
3. In areas where the basin condition is not known and there is evidence of overdraft due to declining water levels in a well or wells, it shall be assumed that any net increase in groundwater extraction may potentially cause a significant impact until such time as reliable studies determine otherwise.
4. Notwithstanding the above, any project which would result in 0.15 acre-feet (AF)¹⁰, or less, of net annual increase in groundwater extraction is not considered to have a significant project or cumulative impact.
5. The Fox Canyon Groundwater Management Agency (FCGMA) is in itself mitigation for water used within the FCGMA boundary, provided there is compliance with FCGMA Ordinances. (These ordinances may require a significant penalty for exceeding an established allocation.)

Water Supply Distribution: Additionally, this chapter addresses the project's impact on the domestic water purveyor's (Warring Water Services, Inc.) water supply distribution system.

For purposes of this EIR, a project will have a significant impact if:

1. The project does not have access to a permanent supply of water for the proposed project. (A permanent supply of water has been defined by the Board of Supervisors as at least a 60-year supply.)
2. The storage and distribution system is inadequate for the proposed project and the domestic water purveyor does not have a readily available means to pay for needed improvements.

4.10.1 Environmental Setting

Groundwater Quantity

Groundwater is the single most important and largest source of water in the County. It is pumped extensively by individual well owners as well as purveyors who sell it at either retail sales to individuals or at wholesale to other purveyors. Since, overall, more groundwater is used than is replaced, the County's groundwater reserves are slowly decreasing (i.e., water is being extracted more rapidly than it is being replaced).

One of the largest groundwater supplies in the County is contained within the Oxnard Plain Basin. Both the Oxnard aquifer and the Fox Canyon aquifer in the Oxnard Plain area are being over-drafted. Long term over-drafting has caused serious seawater intrusion of the Oxnard aquifer. A Seawater Intrusion Abatement Project is currently underway to remedy this problem. In addition, the Fox Canyon Groundwater Management Agency Plan has been established to manage the Oxnard Plain Basin.

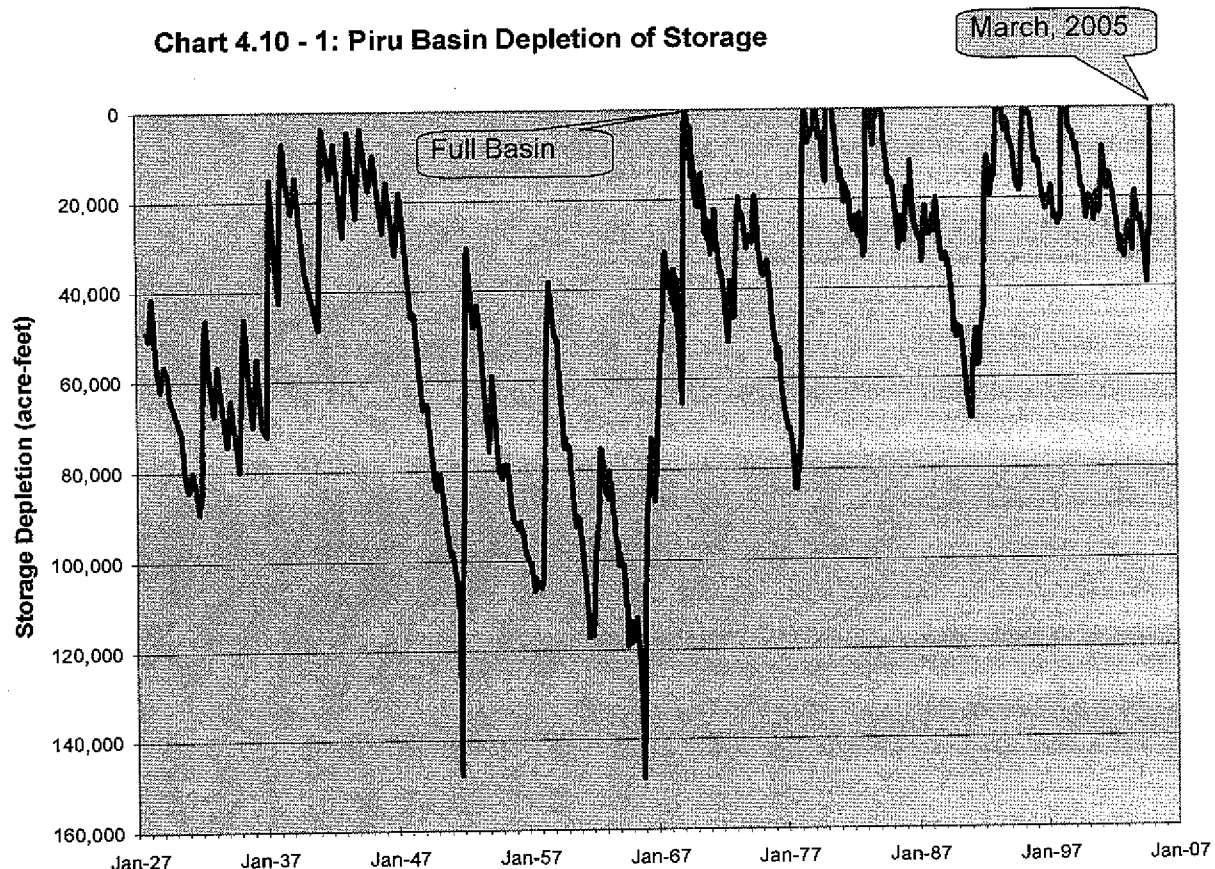
The project site is located within the Santa Clara River Valley Basin, Piru Sub-basin. Groundwater in the sub-basin is generally unconfined and flows westward. Groundwater recharge occurs through

¹⁰ An acre foot is equal to 325,851 gallons or 43,560 cubic feet.

percolation of runoff from surface water (Piru Creek, Hopper Canyon Creek, and Santa Clara River), direct percolation of precipitation, subsurface flow, and return of irrigation waters. Additionally, water from Lake Piru is diverted to percolation basins near the Piru Community to provide recharge.

The Piru basin fills and partially depletes on a cyclic basis (Figure 4.10-1). There exist periods of declining groundwater levels during dry periods and rapid recharging of the basin during the onset of wet periods. The UWCD measures the groundwater level at a key well located near the confluence of Piru Creek and the Santa Clara River. A groundwater elevation level of 625' indicates that the basin is full; any water level below 625' indicates some amount of depletion, measured in acre-feet (4-19-05 Memorandum, graph, and curve from Ken Turner, UWCD.)

Figure 4.10-1 Piru Basin Depletion of Storage



By using the methods of groundwater level and depletion, it was determined in October, 2004, that the Piru basin's groundwater storage was depleted by approximately 39,000 acre-feet (AF). Just five months later, in March 2005, the basin filled. Piru basin has totally refilled 10 times in the last 36 years. More importantly, the amount of storage depletion during the last four dry cycles, over those 36 years, has been progressively less severe. The Piru basin is not currently in overdraft and the current level of pumping of the basin can continue without a negative effect. (4-19-05 and Oct. 2005, Ken Turner, UWCD.)

As a wholesale water district, United Water Conservation District (UWCD) obtains its water from the Santa Clara River and the Piru Creek Watershed, which is captured in and released through Lake Piru via the Santa Felicia Dam. This water is then released to recharge the Piru basin. According to Pete Dal Pozzo of UWCD, agricultural interests account for 96% of the total pumping from the aquifer. The remaining 4% of the water extracted is for municipal, industrial, and domestic purposes (Warring Water supplies almost all of this water). In 2003, a total of 10,362 AF/yr was pumped from the Piru Basin; the average pumping from 1980 through 2003 was 12,477 /yr. UWCD has enough water to

make up for the amount that is extracted each year without causing an over-drafting situation. (Dana Wisehart, UWCD, April 2005.)

Water Supply Distribution

Warring Water Services, Inc, a retail water purveyor, provides most of the municipal, industrial, and domestic water for the community of Piru (Dave Panaro, VC Water Resources Division, April 2005; Pete Dal Pozzo, UWCD, April 2005). In 2004, the total water supplied to domestic users was 280.16 acre-feet (AF). Also, Warring provides water to some agricultural interests in the area each year; in 2004, Warring supplied 313.78 AF to agricultural users. (Based on Water Usage report, Warring Water Service, June 2005.)

Warring Water obtains its water supply from three wells which draw from the Piru basin. The wells are located adjacent to Camulos Place, about 400 feet north of the Fillmore-Piru Packing Plant. One of the wells (well #2) is not pumping efficiently and will need to be re-worked. This improvement is necessary whether or not the proposed project is built. Warring does not foresee a need for another new well within the next eight years (Gary Pace, Warring Water, April 2005).

Warring Water Service enjoys the legal rights of continued access to the Piru basin. Thus, as more groundwater is needed, Warring should be able to access, store, and supply it to future, additional water users (Gary Pace, Warring Water Service, November 2005).

Warring Water uses an existing tank that has a total capacity of 1.1 million gallons (3.4 acre-feet) to service the community of Piru. The current excess capacity in the tank is approximately 264,000 gallons. In determining how much storage capacity is required for each domestic user, Warring uses the figure of 396 gallons per day (there are different gallons per day figures for agricultural, industrial, etc., water users). Thus, the number of additional domestic users that could access the storage tank is 667 ($264,000/396 = 667$).

From the storage tank, water is delivered through mainline pipes (that are 10-12 inches in diameter that feed into smaller service lines for the users of the water). All the water supplied through Warring's system is potable. That is, all users—including agricultural and municipal—receive potable water.

4.10.2 Impacts

Groundwater Quantity - Project Impacts

Existing agricultural and residential water usage within the proposed Piru Expansion Area for all four Components has been estimated at 96.0 acre-feet (AF) per year, which is based on the following calculations. First, the acreage devoted to specific land uses had to be determined. For Components A, C, and D, aerial photos were reviewed. For Component B (Levy), well records for citrus production (and one residential unit) on the site were supplied by Roger Campbell in his report titled *Piru Basin Report*. See Figure 4.10-2 for details.

Component A

The annual average number of acres devoted to citrus was 0.17. This was calculated by multiplying 1.25 times 2 (for two years of citrus production), equaling 2.5; this number was divided by 15 (for 15 years), resulting in 0.17. This amount was then multiplied by 1.7 AF/acre/yr (the typical amount of water used for citrus), which resulted in 0.3 annual average groundwater extracted for citrus. No row crops were grown. One residential unit existed there for all 15 years, resulting in an annual extraction amount of 0.68 AF/acre (0.68 AF/acre/year is the typical annual average amount of residential water used in Piru, per Dave Panaro, Water Resources Division, October 2005). See Component A (Rieder) of Figure 4.10-3 above for the average annual water extraction (in acre-feet/acre) during the period of 1988-2002.

Figure 4.10-2 Dwelling Units and Acreage of Citrus and Row Crops

Area	1988-1989 Activity Period	1990-2001 Activity Period	2002 Activity Period
John Rieder (Component A) ¹	Citrus: 1.25 ac. Row Crop: 0 ac. Res. units: 1 unit	Citrus: 0 ac. Row Crop: 0 ac. Res. units: 1 unit	Citrus: 0 ac. Row Crop: 0 ac. Res. units: 1 unit
Dana Levy (Component B):	Citrus: 15.97 ac. Row Crop: 0 ac. Res. units: 1 unit	Citrus: 15.97 ac. Row Crop: 0 ac. Res. units: 1 unit	Citrus: 15.97 ac. Row Crop: 0 ac. Res. units: 1 unit
James Finch (Component C)	Citrus: 32.8 ac. Row Crop: 0 ac. Res. units: 2 units	Citrus: 32.8 ac. Row Crop: 0 ac. Res. units: 2 units	Citrus: 23 ac. Row Crop: 9.8 ac. Res. units: 2 units
County of Ventura (Component D)	Citrus: 5.44 5.13ac. Row Crop: 0 ac. Res. units: 4 units	Citrus: 5.44 5.13ac. Row Crop: 0 ac. Res. units: 4 units	Citrus: 5.44 5.13ac. Row Crop: 0 ac. Res. units: 4 units
Totals	Citrus: 55.46 55.15ac. Row Crop: 0 ac. Res. units: 8 units	Citrus: 54.21 53.9ac. Row Crop: 0 ac. Res. units: 8 units	Citrus: 44.44 44.1ac. Row Crop: 9.8 ac. Res. units: 8 units

Note 1: From 1986 to 1989, aerial photos show that approx. 1.25 acres of the Rieder property were devoted to growing citrus trees and the remainder of the land appeared to be yard area of the residential home. From 1990 to 2002, the land was no longer being used to grow citrus trees (they were removed); all five acres of land appeared to be used entirely for residential purposes. Next, the acreage devoted to specific uses was given an averaged over a 15-year period (1988-2002) and multiplied by the per acre water amounts (acre feet per acre per year) specific to that use. The result is the average annual groundwater extraction for the respective Components. See each Component below and Figure 4.10-3 for details.

Figure 4.10-3 Average Annual Groundwater Extraction

	Component A (Rieder) (AF/yr)	Component B (Levy) (AF/yr)	Component C (Finch) (AF/yr)	Component D (Ventura County) (AF/yr)	All Components Combined (AF/yr)
Citrus	0.3	26.9	52.9	9.3	89.4
Row crops	0	0	1.8	0	1.8
Residential	0.7	0	1.4	2.7	4.8
Totals	1.0	26.9	56.1	12.0	96.0

Component B*

Using the records supplied by Roger Campbell (on behalf of Dana Levy), the annual average water extraction is 7.93 AF/acre for all Ingall's 5.33 citrus acres (this includes water use by the residential unit on the property). Planning staff also reviewed the historical water records for Warren's property (11.17 citrus acres), which showed the annual average extraction as 45.7 (11.17 citrus acres X 4.09 AF/acre/year). This figure of 45.7 AF/year provided by Mr. Campbell was not used because it was based on an unusually high water usage amount for citrus of 4.09 AF/acre/year and Mr. Campbell was unable to account for the apparent disparity. The typical amount of AF of water used for an acre of citrus in a given year is 1.7 AF/acre/year. Thus, using the typical water usage rate of 1.7 AF/acre/year, the adjusted annual average groundwater extraction is 19 AF/acre for Warren's 11.17 citrus acres (11.17 X 1.7 AF/yr/acre). Component B (Levy) of Figure 4.10-3 shows the combined total of 26.93 as the average annual water extraction (AF/acre) during the period of 1988-2002.

Component C

The average number of acres devoted to citrus production for the 15-year period was 32.1 (14 years of 32.8 acres devoted to citrus plus one year of 23 citrus acres totaled equals 482.2; this was then divided by 15 years). When 32.1 is multiplied by 1.7 AF/acre/year, the result is 54.57, the amount of water used for citrus orchards and the expected average annual groundwater extraction (AF/acre).

However, according to Finch, only 65% was groundwater extracted from the Piru Basin; the other remaining 35% was obtained from water diverted from Piru Creek. In general, it is assumed by UWCD staff that approx. 90% of Piru Creek water diverted for area farmers would have recharged the Piru Basin through percolation via the creek and river beds if the water had been allowed to flow its natural course (Murray McEachron, UWCD, Dec. 2005). Ninety percent of the 35% of Piru Creek water diverted to Finch is 32% ($90\% \times 35\% = 32\%$). This 32% is the percentage of diverted creek water used by Finch that would have recharged to the Piru Basin. The result of adding 65% and 32% is 97%, the percentage that can be used to calculate the annual average groundwater extraction by Finch for his citrus crops. Thus, 52.9 AF/yr ($54.57 \times .97 = 52.9$) was in fact extracted from the ground for citrus

Finch devoted 9.8 acres of his property for row crop production for one year during the period of 1988-2002. The result of dividing 9.8 acres by 15 years equals 0.65, which is the average number of acres devoted to row crops this period. This average of 0.65 was multiplied by 2.8 (typical acre-feet of water used per year per acre for row crops) is 1.82, the expected annual average groundwater extraction. In order to identify the actual annual groundwater extraction for Finch's row crop production, the figure of 97% is used (see reasons and methods in the above paragraph) and then multiplied by 1.82, resulting in 1.8 AF/acre/year (after rounding). The annual average groundwater extracted for the residences for the existing two residences in the subject area for the 15 year period was 1.36 (two single family units $\times$ 0.68 AF/acre/yr). The water extracted for the two residences was well water—not water diverted from Piru Creek. See Figure 4.10-3 for details. (Jim Finch, applicant, Oct. 2005)

Component D

A total of 5.44 5.13 acres (Thompson parcel) were devoted to citrus for all 15 years. Thus, the average annual groundwater extracted is estimated at 9.3 8.8 AF ($1.7 \text{ AF/year} \times 5.44 \text{ 5.13}$). (Note: As Thompson had no accurate records, the standard 1.7 AF/year figure was used to calculate.) No row crops were grown. Four residential units existed (on the other remaining parcels of Component D) for all 15 years, resulting in an average annual extraction amount of 2.72 AF ($4 \times 0.68 \text{ AF/acre.}$).

Combined Total Impact

Residential development of the proposed Piru Expansion Area is estimated to require an estimated 268 AF/acre/year of groundwater for domestic and landscape irrigation purposes. This is based upon 394 residential units multiplied by 0.68 AF/year, which results in 268 AF/year. Thus, the combined residential development of all Components is estimated to utilize 172 additional acre-feet of water per year ($268 \text{ AF} - 96.0 \text{ AF} = 172.0 \text{ AF}$) beyond that which has been used historically for agricultural production and the existing eight houses.

Based on the above analysis, the proposed project will result in a net increase of groundwater pumping from the Piru basin. While certain amounts of groundwater depletion are normally not significant, an overdrafted situation is not potentially significant. Potential signs of overdraft include:

1. Sustained groundwater level declines over multiple hydrologic cycles that are not accounted for in changes in rainfall amounts; and/or
2. Pumping induced groundwater quality degradation; and/or
3. Land surface subsidence.

(4-19-05 Memorandum, graph, and curve from Ken Turner, UWCD.)

If pumping of the Piru basin increases by several hundred acre-feet each year, the basin should not become overdrafted. Thus, the 172 additional AF/year associated with the project would not have a significant impact on the Piru Basin. (4-19-05 Memorandum, graph, and curve from Ken Turner, UWCD; confirmed in Oct. '05 phone message from Turner.)

While the Piru Sub-basin is not considered overdrafted, it is in hydrological connection with the groundwater basins downstream and with the overdrafted Oxnard Plain Basin (David Panaro, Water Resources Division, Memo 11-7-05). Furthermore, the Initial Study Assessment Guidelines define the threshold criteria for determining significant impacts with respect to groundwater quantity as "a land use or activity, which could cause a significant adverse impact upon groundwater quantity in itself or

on a cumulative basis. Threshold criteria include, but are not limited to, any land use that will directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a basin that is overdrafted, shall be considered to have a potentially significant impact."

Thus, the extraction of groundwater from the Piru basin will indirectly decrease the net quantity of groundwater in the overdrafted Oxnard Plain, resulting in a potentially significant impact. This will require appropriate mitigation measures, which are discussed below.

Groundwater Quantity—Cumulative Impacts

Piru Area Basin

As mentioned in the Introduction, build-out of all the ~~vacant~~ undeveloped residentially-zoned parcels within the existing Piru Community could potentially result in development of an additional 176 single-family and 37 multi-family residential units. Also, there is the potential for mixed-use residential redevelopment within the Community Business District that may result in another 50 multi-family units. This could result in an additional 445 ~~179~~ AF/year (~~243~~ ~~263~~ dwelling units x 0.68 AF/year/residential unit). This potential annual residential groundwater total must be offset by 34 AF, the estimated annual historical water used for citrus by the Camulos Orchard property ($20 \times 1.7 = 34$). Thus, the net annual potential groundwater lost could be 145 AF/year ($179 - 34 = 145$).

The Piru Community contains approximately 3.5 acres of vacant commercial land and 12 acres of vacant industrial land. If developed, these areas could potentially accommodate approximately 20,000 square feet of commercial space and 104,000 square feet of industrial floor area. At an average of two employees per 1,000 square feet of floor area, build-out of the vacant commercial and industrial properties in Piru would be expected to generate approximately 248 additional employees. ~~The Water Resources Division calculates approximate amounts of water used for different types of commercial and industrial enterprises. One method of calculating water usage is by estimated AF per 1,000 square feet of industrial or commercial floor space. The actual types of businesses that will be built in the future in Piru are not known. Planning staff used a median of various amounts provided by WRD; thus, 0.25 AF/year/1,000 square feet of floor space was used. The estimated amount of water that may be used is 31 AF/year ($124,000/1,000 = 124$; $124 \times 0.25 = 31$ AF/year) for commercial and industrial buildout. While the actual type of businesses that will be built in the future in Piru are not known, the Water Resources Division provided estimated amounts of water used for different types of commercial enterprises (see Figure 4.10-4).~~

Figure 4.10-4 Estimated Commercial Water Use

Commercial Use	Estimated acre-feet of water used annually per 1,000 square feet of commercial space
Auto Repair or Body Shop	0.11
General or Medical Office	0.10 to 0.15
Bank or Church	0.17
Dentist Office	0.25
Shopping Center	0.28
Grocery Store	0.42

Planning staff elected to use the shopping center amount of 0.28 AF/year/1,000 square feet as it considers other combined uses of restaurants, outdoor landscaping, etc. The estimated amount of water that may be used for commercial buildout is 5.6 AF/year ($20,000/1,000 = 20$; $20 \times 0.28 = 5.6$ AF/year).

In regard to industrial water use amounts, the WRD provided the estimate of 0.07 to 0.15 AF/year/1,000 square feet for warehouse or industrial storage facility uses (one type of industrial use). Planning staff chose the higher figure (0.15 AF/year/1,000 square feet) as other industrial uses (manufacturing, processing, fabrication, etc.) would likely use more water if in fact such operations were located in the industrial areas of Piru. Thus, the estimated amount of water that may be used for industrial buildout is 15.6 AF/year ($104,000/1,000 = 104$; $104 \times 0.15 = 15.6$ AF/year). The result of

combining 5.6 AF/year (estimated future commercial water use) with 15.6 AF/year (estimated future industrial water use) results in 21.2 AF/year for total commercial and industrial buildout.

United Water Conservation District's Lake Piru Recreation Area master plan expands the existing recreational facilities at Lake Piru. While, the expansion creates an additional projected average annual water demand of 4.89 AF/year and an additional projected annual peak water demand of 9.59 AF/year in dry years, local groundwater is not used. The water source for the project is the surface water from Lake Piru, which is treated and then stored in water tanks. UWCD purchases State Water Project water to offset the incremental increased water consumption that may occur as a result of the improvements. Thus, there will be no adverse impacts to local groundwater resulting from UWCD planned Piru Recreation Area expansion.

The Cabrillo Economic Development Corporation hopes to develop a farmworker housing project on Center Street, just east of the community. This project could result in 35-70 farmworker family residential units. It can be assumed that 4-5 people will occupy each unit. (Cabrillo Economic Development Corp., Karen Fox, June 2005.) A slightly different calculation method was employed in estimating water use for farmworker units. Farmworker units may house as many as five people; whereas it is assumed that 3.66 persons reside in other dwelling units (see Project Description chapter). It is assumed that approximately .19 AF of water is used for persons living in Piru (.68 AF/year for typical Piru residence divided by 3.66). By multiplying five (the number of persons in a farmworker unit) times .19 equals, the result is .95 AF of water per farmworker unit. Thus, this project would result in a projected demand of 66.5 AF/year (70 units x .95 AF/year/farmworker unit).

Recently, a General Plan Amendment Screening application was submitted for development of Rancho Temescal in Piru Canyon. The Rancho Temescal project consists of 127 single-family dwelling units on ten-acre farms, 19 farmworker housing units, a public park, and a school. It is estimated that development of this project will use an additional 2,147 AF of groundwater each year (2,946 from the proposed Rancho Temescal project less 799 currently/historically used).

Also in the Piru Canyon, but outside of the Rancho Temescal proposed development area, are approximately 50 acres of locally important agricultural land that are not currently being farmed. Potential agricultural irrigation of these 50 acres is estimated to result in 112.5 acre feet of additional groundwater extraction (assuming a mix of citrus and row crop development). Thus, the total, additional, estimated groundwater demand in Piru Canyon is 2,259.5 AF each year

Thus, the total cumulative impact is estimated at 2,492.2 242.5 AF/yr from the buildout of the community of Piru Community and Piru Canyon.

Fillmore and Santa Paula Basins

According the County's Public and Services Appendix and the UWCD, Fillmore and Santa Paula depend entirely on groundwater from the Fillmore and Santa Paula basins for their municipal and industrial supplies. These basins are in hydrological connection with the Oxnard Plain Basin.

The populations and water demands of these areas are expected to increase. As of 2005, the cities and surrounding areas of Fillmore and Santa Paula have approximate populations of 16,534 and 34,724, respectively; by 2020, Fillmore's forecasted total population will increase to 23,038 and Santa Paula's will increase to 43,443 (Source: VC General Plan Update, Land Use Appendix Amendments, Figure 3.3.1 Population Forecast). Thus, Fillmore will add 6,504 more residents who will extract 1,236 additional AF of water each year in 2020 (6,504 X .19 AF per person per year = 1,236). Santa Paula will add 8,719 more residents who will extract 1,657 additional AF of water each year in 2020 (8,719 X .19 AF per person per year = 1,657). However, Santa Paula is restricted to its current allocation of groundwater; future additional water demand will be obtained through alternative sources such as acquisition of State Water Project water, reuse of treated wastewater, etc. Thus, the city should not have an impact. In sum, it is projected that, by 2020, an additional 2,893 1,236 annual AF of Fillmore-Basin and Santa Paula-Basins groundwater will be extracted, which will have an impact on the overdrafted Oxnard Plain Basin downstream.

Therefore, the effect of the proposed project's 172 additional AF of groundwater extraction on the Oxnard Plain Basin is cumulatively considerable when viewed in combination with the effects of the additional projects and population demands in the region.

Water Supply Distribution Project Impacts

As mentioned above, Warring Water Service enjoys access rights to the Piru basin. The proposed project does not prevent Warring from continuing its access to this water. Furthermore, Warring will be able to access and supply the necessary water to the project's additional users. (Gary Pace, Warring Water Service, Nov. 2005.)

Regarding the storage tank, the current excess capacity would accommodate 667 additional domestic users. After the proposed project is built, only 273 more domestic connections would be available ($667 - 394 = 273$). Still, the project will push the tank near its maximum capacity.

Water Supply Distribution Cumulative Impacts

The cumulative build out of the Piru Community would add an additional estimated 283 new domestic users plus any additional future water demands from local industrial, and commercial, or agricultural connections. Therefore, the cumulative development will exceed Warring Water Service storage tank capacity. This will result in a significant impact to Warring's water storage capacity.

The PUC has already approved plans for an additional tank. Warring has the right to charge new users "Facility Fees" as permitted by the PUC. This \$2,000 (approx.) per-home-fee contributes to monies set aside for future facilities (such as storage tanks, pumps, etc.) that are necessary for the community. This will help pay for the new tank that will have to be built. Thus, the impacts on facilities will be self-mitigating and will have no significant effect. (Possible environmental effects of building the tank are discussed below in the residual section.)

Relevant Plans and Policies

The General Plan *Goals, Policies and Programs* were reviewed for applicability to the proposed project. The project was determined to be consistent with the relevant water resource and Water Supply Facilities goals, policies and programs, with the exception of the following:

- Policy 1.3.2-4 *Discretionary development shall not significantly impact the quantity [...] of water resources within watersheds, groundwater recharge areas or groundwater basins.*

This policy is supported by the following goals:

- Goal 1.3.1-2 *Effectively manage the water resources of the County by adequately planning for the development, conservation and protection of water resources for present and future generations.*
- Goal 1.3.1-4 *Ensure that the demand for water does not exceed available water resources.*

Since the proposed project and cumulative development within the Santa Clara River area have the potential to reduce the total amount of water recharging the Oxnard Groundwater Basin, which is currently in an over-drafted state, the proposed projects can be deemed to be inconsistent with policy 1.3.2-4.

The *Piru Area Plan* Water Resource and Domestic Water Supply goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant *Piru Area Plan* goals, policies and programs, with the exception of the following:

- Policy 1.9.2-1 *Developers of discretionary projects shall be required to submit a water conservation plan which should include consideration of low water usage landscape plants and irrigation systems and/or low water usage plumbing fixtures and other measures designed to reduce project water usage.*

This policy is in support of the following goal:

Goal 1.9.1-3

Encourage employment of water conservation techniques in new construction.

The project applicants have not yet submitted water conservation plans. As such, the projects are inconsistent with Piru Area Plan Policy 1.9.2-1.

4.10.3 Mitigation Measures

Groundwater Quantity—Mitigation of Project Impacts to the Oxnard Plain Aquifer

GQ-1 Prior to tract map recordation, the developers shall prepare a Groundwater Mitigation Plan, subject to the review and approval of the WPD, which shall incorporate one or more of the following mitigation measures to ensure that there will be no significant impacts to net-loss-of groundwater to the Oxnard Plain Groundwater Basin as a result of the proposed projects.

This mitigation is consistent with the County's Water Management Plan (WMP) policy of supporting and encouraging Fox Canyon Groundwater Management Agency (GMA) and United Water Conservation District programs which address overdraft. This mitigation is also consistent with the WMP policy of preserving groundwater resources within the Fox Canyon boundaries.

Piru Wastewater Treatment Plant Recharge Option

On Highway 126, approximately 1.5 miles southwest of the community of Piru, the Piru Wastewater Treatment Plant provides primary and secondary wastewater treatment for Piru. The Plant currently produces approximately 0.63 AF/day (230 AF/year) of treated water, which is currently directed to offsite percolation ponds located adjacent to the Santa Clara River, south of the plant (Reddy Pakala, Dec. 2005). The Plant will be upgraded and expanded (beginning March 2007) and it will produce tertiary level water. This upgrade will result in a maximum capacity of 1.57 AF/day (573 AF/Year) (Reddy Pakala, June 2005). This additional wastewater could be utilized to offset the increase in water demand of the proposed projects, if the wastewater would replenish the groundwater basin. If feasible, this option would be consistent with the County's Water Management Plan policy of using reclaimed water to promote an adequate water supply.

The County's WRD states that, with the proper treatment, the effluent could be used to replace the extracted groundwater and, thus, could be counted as an offset against the additional 172 acre-feet of water used by the project (David Panaro, WRD, November 2005). WRD would require that hydrology reports be prepared demonstrating that the treated water would in fact result in additional recharge to the groundwater basins in the intended amounts (David Panaro, Water Resources Division, 11-15-05). It should be noted that approximately 57 percent, or 152 acre-feet, of the water used by residences will ultimately ends up in the sewer system. The remaining 43 percent is will be primarily used primarily for landscaping, pools and other outdoor uses, much of which is lost in evaporation. Therefore, in theory, up to approximately 57 percent of the water used by the project could be offset by percolation of treated sewage. After the water is received and treated by the Piru Wastewater Treatment Plant, it will go to the plant's spreading ponds, where approximately 4 acre-feet will be lost to evaporation each year. The remaining 152 acre-feet of water will recharge the local groundwater. This amount could offset the 172 acre-feet each year; thus, the net impact to local groundwater would be reduced to only 20 acre-feet each year.

As an alternative to simply recharging the treated sewage back into the groundwater directly, the effluent could be improved to a level where it could be used directly to irrigate agriculture, thus resulting in less pumping of groundwater on those farmlands. This option would require additional facilities, equipment, and processes process control (in the treatment plant) to improve the quality of wastewater to the State water quality standards (Title 22); there would be a very small increase in cost due to the additional chlorine that would be added. In addition, it would be necessary for the end users to be trained in the handling of this tertiary level water. To save energy costs, the ideal farmlands would be those located at elevations lower than the sewage treatment plant in order to utilize gravity flow distribution lines. The economic and political feasibility of this option and the willingness of farmers to use this treated water isn't currently known. Moreover, it is doubtful that this

option would result in any net water savings over simply recharging the effluent directly into the groundwater basin.

In theory, the treated sewage effluent could also be used to irrigate landscaping within the community of Piru (e.g., Warring Park, Piru Town Square, Piru School, the proposed park, the planned landscaped areas proposed along Main Street, the proposed landscaping within the agricultural buffers); As in the case of using tertiary water on agriculture, additional measures would have to be taken. It would be necessary for there to be additional process control, and users would need training on the additional guidelines for its use, and there would be an increase in the cost. However, the biggest impediment would be the cost of constructing additional distribution lines and the energy costs associated with pumping the treated water back to the community of Piru, which would likely render this option as economically infeasible. Moreover, it is doubtful that this option would result in any net water savings over simply recharging the effluent directly into the groundwater basin.

Reduced Groundwater Usage through Conservation Option

A significant portion or amount of the project water demand can be mitigated by a combination of water conservation measure consisting of:

- Low-flow fixtures and water efficient appliances (e.g., faucet/shower flow restrictors, very low-flow toilets, low-water dish washers and washing machines, water softeners);
- Drought tolerant landscaping that requires very little if any watering throughout the year to remain vibrant and healthy; or
- Advanced irrigation controllers with solar sensors and ground moisture meters that prevent landscape watering during rainfall periods or when soil moisture is already sufficient for plant needs;
- Use of highly porous pavement surfaces in sidewalks, streets, parking lots, patios, and other pedestrian or vehicle high-traffic areas that trap and percolate rain water;

Any and all of these possible and feasible measures can be employed to reduce project water impacts, especially in the areas of highest typical water use (landscaping). Using information from the Metropolitan Water District of Southern California, Planning Division staff concluded that by using drought tolerant plants and advanced irrigation controllers, the proposed project could reduce its total water demand by 54 AF (20%). If this water savings is combined with the option of recharging the groundwater with the project's treated sewage water, then, in theory, the groundwater impacts could be reduced to less than significant. Additional information concerning sustainable landscaping techniques is available at <http://www.bewaterwise.com> (California Friendly Homes).

In addition, retro-fitting existing homes with these devices and techniques may reduce the groundwater demand further.

This option is required by Policy 1.9.2-1 of the *Piru Area Plan*, which requires developers to provide a water conservation plan.

While it is clear that this option would provide groundwater savings, the applicants will be required, prior to map recordation, to provide detailed calculations (in a water study) demonstrating the expected water savings.

Water-Capture, Storage, and Recharge Option

Another possible mitigation option would involve capturing project storm run-off water in a percolation basin, storage tank, or other means of storing run-off. This captured water could then be percolated or directly injected back into the ground. Only that amount of rainfall runoff that would normally be wasted lost to the Pacific Ocean, or that amount which would not normally percolate to groundwater, will be counted as mitigation to offset project water demand.

UWCD's spreading grounds (adjacent to the proposed project) present a location for storing and recharging the aquifer. Dana Wisehart states that UWCD does not, in general, accept urban/stormwater runoff. The only possible exception that UWCD's Board of Directors would consider would be receiving urban runoff through some type of bioswale treatment system. Possible bioswale

systems might include placing grasses or vegetation in the detention basin from which the drainage water would be directed to the UWCD spreading grounds; directing project runoff to a basin on the UWCD site before entering the ponds; or some other bioswale alternative acceptable to UWCD's Board. The feasibility and effectiveness of such a system would need to be determined through a water study.

Even if UWCD accepts the drainage water, certain areas of the project would require that runoff be pumped to UWCD's basins. The cost of pumping/directing water to United's grounds would need to be analyzed to determine its cost-benefit. As an alternative, other basins or spreading ponds could be developed, either onsite or offsite. The basins' size, depth, the amount of captured water, filtration, cost-benefit analysis, length of time of standing water—these and other considerations (determined in a hydrology study) would be necessary in order to determine the viability of this option.

New or Imported Water Suppliers Option

This involves securing new or imported water supplies that are outside the Oxnard Plain groundwater basin system and are not tributaries to that system. Any water obtained must not be to the detriment or loss of any other water sources that are in direct or indirect connection to the Oxnard Plain aquifer. For instance, if a new well outside this groundwater system or imported water from the State Water Project could be located, then it could be used as an option. (Dave Panaro, WRD, Nov. 2005.)

The town of Piru (County of Ventura) could develop an agreement with UWCD to release extra water out of Lake Piru for direct replacement into the UWCD spreading basins or recharge ponds. UWCD reports that it has 104 AF of state water allocated to Piru that could be used (Mike Solomon, UWCD, 11-16-05). However, WRD would not likely consider this a viable option. UWCD reports that this 104 AF is currently sent through the Santa Felicia dam. It is released so that it goes to the Freeman Dam Diversion Project or to other spreading grounds where it recharges the Oxnard Plain Basin directly or indirectly. In essence, if this option was utilized, the water would be withdrawn from the Oxnard Plain Basin or Fillmore/Santa Paula Basin (hydrologically connected to Oxnard Plain) only to be directed to the Piru Creek area spreading grounds—moving the water around, but not injecting any new water. Thus, the WRD will not count this option as a viable offset against the project's additional 490.4 172 AF groundwater demand (David Panaro, Water Resources Division, 11-16-05).

At the present time, no new or imported water sources are currently known or available outside the Oxnard Plain system. The only known supplier (i.e., UWCD) would not result in any net gain in the system (as described above).

In order to create the necessary finance system to cover the costs associated with these mitigation measures, the applicants could be required, where appropriate, to obtain an agreement from Warring Water Services, Inc. for the purpose of collecting a surcharge fee from the occupants of the proposed residential project.

As an alternative to using Warring Water, a community services district (CSD) could be established. One advantage of a CSD is that it could also be used to generate tax revenue for other community purposes, such as park maintenance and operations, maintenance of the enhanced Main Street parkways, enhanced law enforcement services and other purposes. Additionally, upon petition of the residents, a CSD can be locally governed, thus providing Piru residents with a measure of local control over their own affairs.

Groundwater Quantity—Mitigation of Cumulative Groundwater Impacts

GQ-2 Discretionary development shall be conditioned to require one or more of the mitigation options described in measure GQ-1.

Water Supply Distribution

As no significant water supply impacts were identified, no mitigation measures are required.

4.10.4 Residual, Unavoidable Impacts

Imposition of the recommended mitigation measures will fully address groundwater quantity impacts.

With respect to water supply, the combined demands of this project and cumulative development of the Piru Community will necessitate the construction of an additional storage tank (Gary Pace, Warring Water, December 2005). Warring Water will likely construct a 1.1 million gallon tank, which is equivalent to its current tank. Mr. Pace will attempt to purchase or lease land as near as possible to Warring's existing tank. The existing tank is located at the northern end of Warring Wash near the entrance to Warring Canyon on property owned by La Verne Nursery. The construction of this tank is not expected to have a significant environmental effect.

General Plan policy inconsistencies with respect to Policy 1.3.24 will be avoided with imposition of the above groundwater quantity mitigation measures. Inconsistency with Piru Area Plan Policy 1.9.2-1 will evaporate once the applicants have submitted a water conservation plan as recommended by measure GQ-1.b.

4.11 Sewage Treatment

Sewage treatment facilities collect wastewater from domestic, commercial, industrial and institutional uses, treat it to remove organic and inorganic hazardous or noxious waste materials, and discharge the treated effluent into the environment. Sewage treatment facilities that serve off-site properties are categorized as "community sewage treatment facilities" by the County General Plan (Goals, Policies and Programs, Glossary). Liquid wastes in Piru are treated at the Piru Wastewater Treatment Plant (PWWTP) a community sewage treatment facility owned by Ventura County Waterworks District No. 16 (WWD-16) and currently operated by Ventura Regional Sanitation District under a contract with WWD-16. The PWWTP is located approximately 1½ miles southwest of the Piru Community.

The County Initial Study Assessment Guidelines contain the following criteria for determining significant impacts regarding sewage treatment:

"Any project that would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing sewer main or sewage treatment plant would have a potentially significant impact. If the project description includes improvements to existing, or construction of new, sewer mains and/or sewage treatment plants which would then be capable of serving the project and other cumulative development, there would be a less than significant impact. These improvements/new facilities, however, must also be assessed for possible impacts on other environmental issues."

4.11.1 Environmental Setting

The PWWTP serves the land uses within the boundaries of WWD-16, which includes the Piru Community and the Sespe Farmworker housing complex. The WWD-16 boundaries also encompass the proposed Piru Expansion Area. Wastewater is conveyed to the plant by means of a 15-inch sewer pipeline. The PWWTP provides primary and secondary wastewater treatment and currently has a rated capacity of 260,000 gallons per day (gpd). The current average flow is estimated at 230,000 gpd. Primary treatment includes physical removal of solids. Secondary treatment includes the biological treatment by an activated sludge treatment. Treated effluent is discharged into percolation ponds located ¾ mile southwest of the PWWTP, about 500 feet from the Santa Clara River.

Wastewater discharge is regulated by the Regional Water Quality Control Board (RWQCB). Pursuant to this the RWQCB issued Order No. R4-2004-0032 on January 29, 2004. This order establishes Waste Discharge Requirements (WDRs), and sets both interim and long-term effluent limitations applicable to the PWWTP and establishes a timeline for compliance. This RWQCB order requires WWD-16 to upgrade the PWWTP to meet RWQCB standards with regard to biological oxygen demand (BOD) and total suspended solids (TSS). Additionally, the PWWTP must be expanded to meet minimum reserve capacity standards established by the regional board. The required improvements must be completed by March 2007, although a six-month extension can be requested that would extend the deadline to September 2007.

To comply with these RWQCB requirements, WWD-16 has proposed an expansion of the PWWTP that would both improve the quality of wastewater effluent to meet RWQCB requirements and upgrade the capacity of the treatment plant from 260,000 gallons per day to 500,000 gpd average dry-weather flow. Construction of the proposed treatment plant expansion is expected to commence once the Board of Supervisors acts on the subject General Plan Amendment application. Construction is estimated to require about 18 months.

One byproduct of the proposed expansion is that wastewater will be treated to tertiary standards. At full build-out, the upgraded PWWTP will produce about 1.57 acre feet per day (573 acre feet per year) of reclaimed water. This non-potable water can be used for agricultural and landscape irrigation, groundwater recharge, and various industrial uses.

Approximately 100 tons of Class B bio-solids (sludge) is produced each year and is currently transported to Kern County for agricultural soil amendment.¹ Class B bio-solids are the nutrient-rich byproduct of wastewater treatment. Class B biosolids may have low levels of pathogens (disease causing organisms) which rapidly die-off when applied to soils. Class B biosolids that meet all regulatory and health requirements may be applied to non-food crops. The proposed PWWTP expansion will generate an estimated 250 tons per year of biosolids at full capacity.

4.11.2 Impacts

Treatment Capacity Limitations

The existing treatment plant has a rated capacity of 260,000 gpd and currently handles an average of 230,000 gpd. Thus the existing plant has a surplus capacity of 30,000 gpd which theoretically could treat effluent from approximately 75 additional dwelling units prior to completion of the PWWTP expansion. The small amount of reserve treatment plant capacity is necessary to accommodate cumulative development (infill development of vacant parcels within the community) that may occur between now and completion of the planned treatment plant improvements and provide an adequate margin of safety.

The proposed project would generate an estimated 161,000 gpd of wastewater (Marco Segui, 4-18-05). Therefore, the proposed project would far exceed the capacity of the existing wastewater treatment plant. Therefore, the PWWTP cannot currently accommodate the proposed project. This is considered a significant adverse impact. However, as discussed above, WWD-16 is in process of expanding the Piru Wastewater Treatment Plant. The proposed expansion would increase the available capacity from the current 30,000 gpd to 270,000 gpd (500,000 gpd – 230,000 gpd). Once the treatment plant is expanded, the proposed project can be accommodated by the expanded plant. Thus, with completion of the PWWTP expansion, the project will not have a significant project impact on waste treatment facilities.

The expanded PWWTP has been sized to accommodate buildout of the Piru Community and the proposed project. Therefore, cumulative development would not have a significant impact on wastewater capacity. Development of the Rancho Temescal project is not expected to impact sewage treatment since the ten-acre lots would be expected to employ individual septic systems.

The applicants would tie into an existing 15 inch sewer pipeline located along Main Street and Highway 126. The 15 inch line has capacity to accommodate 1.3 million gpd. Existing, development, project development and cumulative development would total 0.48 million gpd. Thus, the existing pipeline is adequately sized to accommodate project and cumulative development wastewater discharges.

Chloride Discharge Limitations

In response to the Notice of Preparation one commenter noted that the City of Fillmore has taken or is considering a number of widely publicized actions in an attempt to address NEPDES permit violations relating to the chloride content of effluent released by the City's wastewater treatment plant. These actions have included a ban on residential water softeners, and consideration of expensive water treatment or desalinization of effluent that may cost the city as much as \$25 million dollars. Piru residents have expressed concerns that water softeners within the proposed development area may contribute to similar violations at the PWWTP.

The County Water and Sanitation Department advises that the existing PWWTP outflow occasionally exceeds the chloride WDRs set by the RWQCB. The standard established by the RWQCB for the PWWTP is 100 milligrams per liter (mg/L). For the period from March 2003 to July 2004, the Water and Sanitation Department reports that chloride levels ranged from 71 mg/L to 140

¹ A Kern County ballot initiative approved by voters in June 2006 would place a ban on land application of treated sewage in Kern County. The initiative is currently being challenged in court. If this measure is ultimately upheld, Water Works District 16 will, at least temporarily, transport sludge produced at the PWWTP to La Paz County, Arizona or to Synagrow (a private composting company with facilities located in Kern County and Riverside County, California). Synagrow uses a heat drying process to create composted and pelletized biosolids for sale as soil amendments. Ultimately, Ventura County Sanitation District is considering construction of heat dryers that would be used to treat biosolids so that they could be used for landfill cover material.

mg/L. Failure to comply with the WDR's can result in enforcement action, including the imposition of financial penalties. Additionally, high salt levels can harm crops and wildlife.

In part, the periodic exceedance of the RWQCB chloride standard is due to the high salt content in the potable water supply provided by Warring Water Service. Warring Water's chloride content was tested recently and determined to contain 65 to 67 mg/L of chloride. Because of the relatively high chloride content of the potable water supply, RWQCB allows the chloride standard to be effectively increased to 152 mg/L. Thus the PWWTP is not in violation of RWQCB requirements.

Assuming that the new development would install water softening equipment at about the same ratio as existing homes in the Piru Community, Water and Sanitation Department anticipates that new development would have a less than significant impact on chloride levels at the PWWTP.

General Plan Policies

The General Plan *Goals, Policies and Programs* and *Piru Area Plan* were reviewed for their applicability to the proposed project. The project was determined to be consistent with all of the relevant General Plan goals, policies, with respect to sewage treatment.

4.11.3 Mitigation Measures

Mitigation Regarding Treatment Plant Capacity

ST-1 Tract maps within the Piru Expansion Area shall not be permitted to record until the PWWTP expansion has been under construction for at least six months. Zoning Clearances for occupancy of residential developments shall not be issued until the PWWTP expansion is completed.

WWD-16 indicates the PWWTP improvements are scheduled to be completed by Fall 2007. Waterworks District #16 has obtained grants and loans to finance the required treatment plant expansion. The loans would be paid back by increasing sewer rates and connection fees. Based upon current cost estimates by Water Works District #16 sewage connection fees (SCF) are estimated to be about \$4,370 per dwelling unit for the Piru Expansion Area. It should be noted that sewage connection fees vary throughout Ventura County from a low of \$2,000 per dwelling unit (Camrosa Sanitation District) to a high of \$8,850 per dwelling unit (Triunfo Sanitation District) with an average SCF of \$4,569. Thus expected SCFs for the Piru Expansion Area are average for Ventura County and are nearly identical with the nearby City of Fillmore (\$4,346 per dwelling unit). Thus, measure ST-1 is expected to be financially feasible.

4.11.4 Residual Impacts

If the above mitigation measure is adopted, residual impacts on wastewater treatment would be reduced to less than significant levels.

4.12 Utilities – Gas Safety and Telephone Service

The public utilities discussed below represent a vital part of the urban infrastructure necessary for properly planned land use. These utilities are regulated by the California Public Utilities Commission.

The section of this chapter related to gas safety is based upon an analysis of odor and health impacts from normal emissions prepared by Aspen Environmental Group (Nov. 2005) and an assessment of safety risk prepared by Reese-Chambers Systems Consultants, Inc. (Oct. 2005).

4.12.1 Environmental Setting

Natural Gas and the SC Gas Facility in Piru

Long-range availability of natural gas is dependent on regulatory policies and worldwide and domestic natural gas supplies. According to Southern California Gas Company officials, adequate supplies and facilities are in place to serve Ventura County during the planning period and therefore no mitigation measures are necessary. Continued conservation practices and technological advances actually may result in incremental decreases in natural gas consumption per household.

SC Gas Company supplies natural gas to all of Ventura County through a fixed pipeline transmission and distribution system. There are approximately 1,125 miles of supply lines and distribution mains in the County. The number of connected meters in Ventura County is about 201,000.

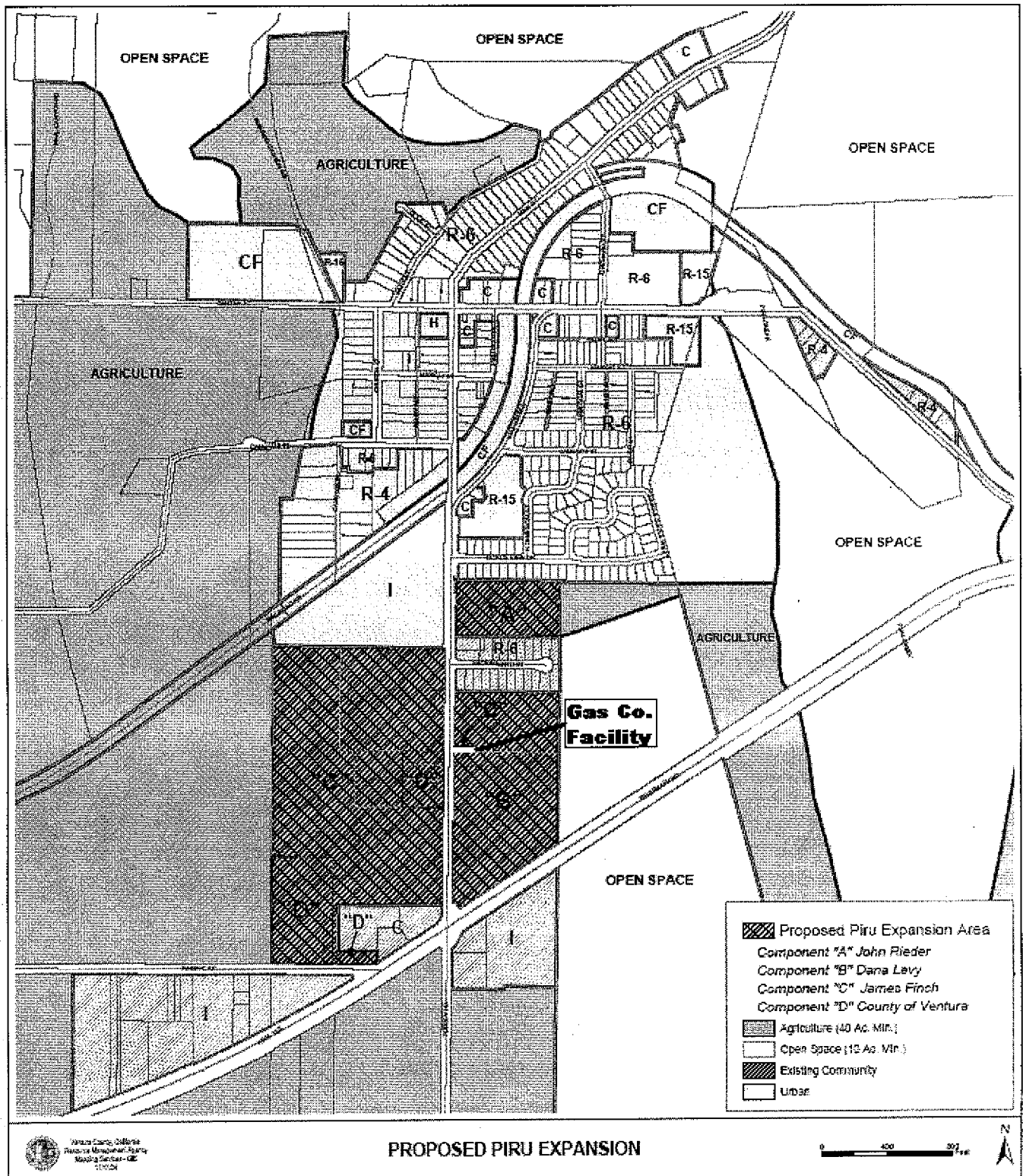
Natural gas is a highly flammable hydrocarbon gas consisting chiefly of methane. Its flammable limits in air are between 5 percent and 15 percent. Although methane is always the chief component, it may also include small amounts of other gases such as oxygen, hydrogen, nitrogen, ethane, ethylene, propane, and even some helium. Natural gas must meet prescribed specification limits of the Southern California Gas Company. Natural gas is naturally odorless. An odorant is added so a leak can be easily detected. Natural gas is not toxic but can cause asphyxiation if breathed in high concentrations. Natural gas is lighter than air and will rise if released.

The SC Gas facility being studied here is similar to such facilities (that also supply gas to local residences and business) that are located throughout the area. The majority of these facilities are located below ground; however, some, mostly located in rural areas, are located above ground. While there are several other gas receiving facilities in the County, none are embedded within a residential neighborhood. There is an above ground high pressure (500 psig) regulating station located in Somis within 100 ft. of a residence and business and within several hundred feet of additional businesses.

The SC Gas facility in Piru is located on Main St. in Piru approximately 1,000 ft. north of SR-126 (Figure 4.12-1). There are two functionally separate systems located at this site, a transmission station and a regulator station. The site is approximately 125 ft. by 31 ft. and is surrounded by a 10 ft. high chain link fence. The gate to the facility is kept locked except when Gas Company personnel are on site.

Transmission Station – The transmission station, which is operated by the Transmission Department of the Southern California Gas Co, is located just west of the regulator station in the southeastern quadrant of the SC Gas site. The station receives locally produced natural gas via a 12-inch gas pipeline which is located under Main Street. Vintage Petroleum Company produces the gas from a field located approximately 6 miles northeast of the facility and transports it to the station via the underground pipeline (which Vintage owns). The Gas Company facility monitors the hydrogen sulfide (H_2S) content of the gas and removes any water remaining in the gas before the gas continues on to the regulating facility. The H_2S content of the gas received should not be above a few parts per million (ppm), but since H_2S is highly toxic, the Gas Company continuously monitors the content of H_2S in the gas. If the concentration exceeds 4 ppm, the receiving line is shut in (i.e., shut off) by automatically closing a block valve located on the pipeline near where it enters the facility and no additional gas is received from Vintage. Vintage would be notified of the problem and so that it could be corrected. In addition, the pressure of the gas received is automatically monitored at the station. The pressure is normally between 200 and 250 pounds per square inch gauge (psig). If it exceeds 265 psig the receiving line is shut in and Vintage is notified as described above for H_2S exceedance.

Figure 4.12-1 Location of Gas Company Facility



As mentioned, Vintage produces the gas from an offsite location and delivers it via the 12-inch pipeline underneath Main Street. From the Main Street pipeline, the gas is transported through an 8-inch diameter line that runs under the street to the boundary of the transmission station. A manual block valve and automatic block valve are located at the facility boundary. The line then becomes a 6-inch diameter line and then a 12-inch diameter line as it runs through the facility where the H₂S content is monitored and the water is removed. Water is removed by letting the gas flow through a spherical vessel that contains a series of baffles and mesh screens. This spherical vessel measures approximately 5 feet across. The gas then flows to the gas regulating facility through a 1.25-inch diameter pipeline. Piping inside the site is above ground. In addition to the two block valves on the pipeline near where it enters the facility, there are six valves in the facility.

Besides a very small continuous gas bleed (of all chemicals mentioned here) from the H₂S monitor, there are no normally occurring emissions other than minor piping component leaks. During monthly maintenance, for about two to three seconds total duration, approximately one pound of natural gas is blown from an orifice meter compartment (SC Gas 2005c).

Gas Regulator Station - This system, located in the southeast corner of the SC Gas property, receives gas at approximately 200 to 250 psig from the gas transmission station. The gas passes through one or more regulators where the pressure is reduced to approximately 45 psig. The gas then exits the facility through a 3-inch diameter line which runs below ground along Main St. This 3-inch diameter line provides gas to residences and businesses in the area. The regulator station is comprised of aboveground piping, piping components (flanges, valves), three pressure regulators, seven valves, a filter, and meter.

There are no normally occurring emissions other than minor piping component leaks, with the exception of minor venting during annual maintenance. During this annual maintenance event a "slight release of gas" is made, lasting less than five minutes, to ensure proper flow in the lines; and a small amount of gas between the two valves (inlet valve, outlet valve) is vented for less than one minute (SC Gas 2005a).

Figure 4.12-2 presents a flow diagram of the facility.

Both regulator and transmission facilities undergo monthly maintenance. The inspection and maintenance (I&M) program includes physical inspection and leak detection and repair. This monthly I&M program will minimize the potential for major component leaks at this site. Additionally, the public can call SC Gas customer service and/or Ventura County Air Pollution Control District in order to register a complaint to remedy any long-term nuisance odor conditions that could occur at the site.

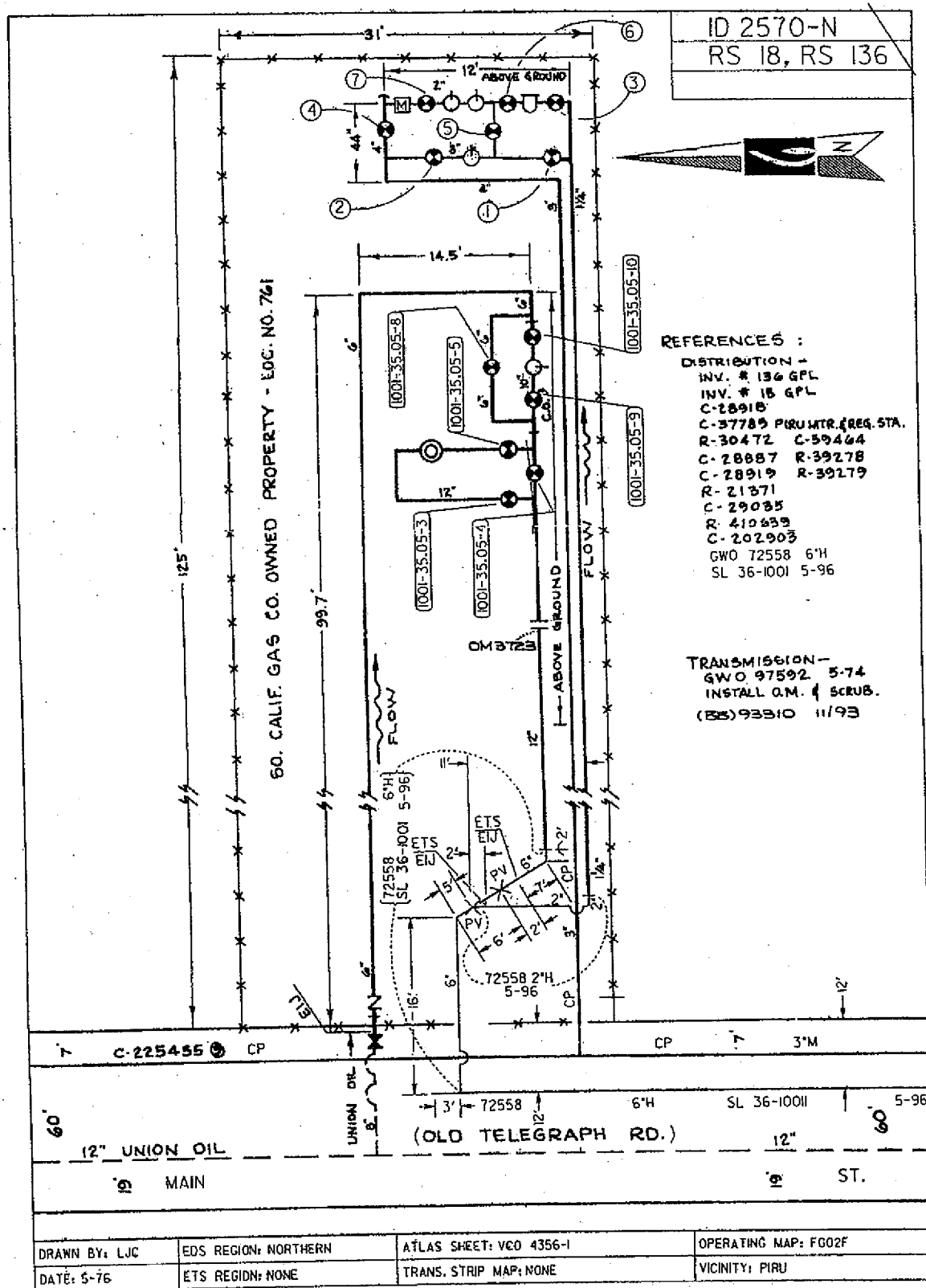
There is presently no system in place at either facility to automatically detect a rupture or major release (from an accident) and shut in (i.e., shut off) the facility. If a release were to occur, it would continue until all the gas was released from the system or until it was detected by someone by sense of smell or lack of gas service. Service staff would then have to be sent to the site by the Gas Company to manually close a valve to shut in the facility.

Telephone Service

Telephone service is provided by SBC California and General Telephone Company of California (GTE), Inc. GTE's Western Regional Headquarters is located in Thousand Oaks, serving a twenty county area with more than 330 communities. GTE provides phone service to the cities of Camarillo, Oxnard, Port Hueneme, Santa Paula and Thousand Oaks; plus the unincorporated areas of Newbury Park, Somis and Westlake. Communities served by SBC include Fillmore, Moorpark, Ojai, Simi Valley, and Ventura; plus the unincorporated areas of Oak View, Saticoy, and Piru.

SBC has ground lines in the Piru area and a central office located on Main Street in town. However, the build-out of the project and cumulative development will require new lines and equipment to be added.

Figure 4.12-2 Gas Company Facility Flow Diagram



4.12.2 Impacts

Project Impacts:

Normal Gas Emissions – Health and Odors

Health - Natural gas is mainly composed of odorless hydrocarbons (primarily methane and ethane). From an inhalation standpoint, is not a particularly hazardous substance. At extremely high concentrations it is a simple asphyxiant (i.e., displaces air/oxygen). Natural gas does contain small amounts of trace materials such as hydrogen sulfide (H_2S) and mercaptans (for odorization).

As mentioned above, H_2S is contained in the piping of the Piru gas facility. It is possible that some small amount of H_2S could be emitted into the air. The maximum exposure level of H_2S allowed for an adult per the California Ambient Air Quality Standard (CAAQS) is 0.03 ppm. The worst-case hourly dispersion concentration of H_2S emission at the fence line of the nearest homes would be 0.00011 ppm. (This is based on a one-hour dispersion modeling analysis; for more details, see Appendix 8.8, Calculating Safe Levels of Hydrogen Sulfide.) This level of H_2S is well below the CAAQS one-hour ambient air quality standard of 0.03 ppm. Thus, the normal emissions from the regulator/transmission station would not have the potential to cause any significant health impacts, or exceed the CAAQS for H_2S .

Natural gas is odorized with trace amounts of mercaptan for safety. The term mercaptan refers to a family of sulfur containing hydrocarbons that are used, typically in a blend, to odorize natural gas. SC Gas indicates that, for the Piru stations, the mercaptan used is a 50/50 mixture of tert-butyl mercaptan (TBM) and tetrahydrothiophene (THT) (SC Gas 2005b). Currently, there are no recommended exposure limits for TBM or THT. Both compounds have very low odor thresholds so that they are perceived at concentrations that are well below those that would be acutely hazardous. In fact, SC Gas uses mercaptan because it can be used safely to alert people to natural gas emissions. While n-butyl mercaptan is not used in Piru, it is a mercaptan and does provide an exposure standard—an 8-hour exposure limit of 0.5 ppm. The total TBM and THT mercaptan level in the pipes at the Piru site is 1.70 ppm. When released into the air, the dispersion will reduce this level considerably, well below 0.5 ppm. Thus, the normal minor emissions from the regulator and transmission station piping component leaks will not have the potential to cause any significant health impacts.

In conclusion, no significant health impacts should occur as a result of normal component leak emissions or pressure relief valve releases.

Odors - No actual sampling, measuring, or metering was performed at the site. In order to estimate the possible maximum impact from odor emissions associated with the stations' component leaks and maintenance events, an air dispersion modeling analysis was conducted (using the ISCST3 model). This USEPA approved model was chosen as it was considered most appropriate because of the stations' site conditions, meteorological conditions, and distance to the proposed residential site. Calculations were made to determine the worst-case concentrations 20 feet east (approximately) of the regulator/transmission site fence line of three of the closest lots.

TBM has the lowest odor threshold (0.08 ppb), and, as such, was used in the model to calculate the possible impacts on people from component leaks. It was found that for very short exposure durations, 5 seconds or less, the possible maximum average concentrations (0.087 ppb) slightly exceeded the TBM odor threshold of 0.08 ppb; further analysis indicated that one-second exposure durations had a slightly higher average concentration (0.120 ppb). Concentration levels decrease as the duration of exposure increases because factors, such as the stability of the wind direction, tend to disperse the concentrations over time at any given downwind location. The short-term perceptible odor identified in the modeling barely exceeded the odor threshold and should not be considered a true nuisance odor. The minor impacts could potentially affect only three of the proposed home sites shown in the Dana Levy residential lot exhibit: lots 63 and 64 to the east and lot 29 to the south. Because of the myriad variables involved, the consultant could not determine the exact probability of exposure affecting someone occupying these lots; nevertheless, due to the conservative piping component leak factors assumed and the low frequency for the specific meteorological conditions

necessary to cause these maximum modeled exposure levels, perceived odors from normal component leaks should only occur infrequently, if at all.

The ISCST3 model was also used in determining the potential exposures from the short-term maintenance events. Such events could cause somewhat higher concentrations over the very short durations, and the perceptible odors could extend farther from the site than the worst-case normal emission odors identified. The maximum concentrations experienced during the worst-case orifice meter compartment blow down event are modeled to be as high as 2.5 times the odor threshold; and barely perceptible odors could occur as far as 175 feet from the SC Gas site fence line for extremely short durations (seconds).

The potential for odor impacts, to the proposed Dana Levy housing development, during normal operations of the SC Gas regulator/transmission facility are minimal. There is a limited potential when piping component leak rates are high that barely perceptible odors may be experienced for short durations on the proposed residential properties adjacent to the SC Gas site; however, the monthly SC Gas inspection and maintenance procedures should limit these component leaks. Perceptible odors may also occur to properties adjacent or very near the SC Gas site during regular maintenance events that will last in duration from a few seconds to a few minutes.

No significant odor impacts should occur during normal operations of the site; therefore, no additional mitigation measures are warranted.

Gas Ruptures and Leaks

There are several potential outcomes if gas is released (from a leak or rupture) as described below:

- The gas flows with the wind and does not become ignited. In this case there are no impacts on the health and safety of the public.
- The gas is immediately ignited resulting in a jet fire. In this case, a jet flame will extend out from the hole in the pipeline or vessel. The direction of the jet flame will depend on the location of the hole. Since there are no ignition sources within the facility site it is highly unlikely that a release would be ignited immediately.
- The gas flows with the wind and encounters an ignition source. Examples of ignition sources include sparks, automobiles, and open flames such as pilot lights and barbeques. In case of ignition, two outcomes are possible. The most likely outcome is a flash fire—a gas cloud becomes ignited and burns back to the source of the release. If the release is ongoing, a jet fire will result after the fire reaches back to the source. It is possible, but extremely unlikely, that an unconfined vapor cloud explosion (UVCE) can occur if the gas encounters an ignition source. For this to occur, a large amount of gas (generally thought to be over 2,000 lbs) would have to be released and the air to gas mixture would have to be nearly uniform.

Hazard footprints are the lengths and distances of the possible jet flame, gas cloud, or overpressure (from an explosion) that could theoretically occur in the event of an accident. The following describes how each of the hazard footprints was calculated. Leaks, except for valve leaks, have been represented by releases from a 1-inch diameter hole; valve leak is represented by a 0.25-inch diameter hole. These are usually the result of corrosion, parts wearing out, etc. Ruptures occur when the pipe or component breaks or splits in half; the size of the rupture is usually the equivalent of the diameter of the pipe. Ruptures are usually the result of some type of impact.

The length of the jet flame hazard distance has been estimated based on the methodology presented in *Guidelines for Chemical Process Quantitative Risk Analysis* (AIChE 2000). This methodology uses pressure, temperature, the characteristics of the gas, area of the hole, and atmospheric conditions to calculate flame length. The direction of the jet flame would depend of the location of the hole and could extend anywhere from vertical to horizontal in either direction.

The distance that a gas cloud will travel before its concentration in air falls below its lower flammability limit (LFL), 5 % for methane, is a function of the release rate, length of time of release, atmospheric stability condition present, and wind speed. Release rate is based on the pressure in the system and the size of the hole. Release duration is a function of the volume of gas contained in the

pipeline/vessel, size of the hole, pressure in the system, and time it takes to detect and isolate the release. Two atmospheric stability/ wind speed conditions were used in the modeling; stability condition F with a 2.2 mph wind speed to represent very stable conditions that result in the largest hazard footprints and stability condition D with 5 mph wind speed to represent more typical atmospheric conditions. It is noted here that stability condition F can only occur at night. The flammable gas cloud would only extend downwind and would only present a hazard if ignited.

Release rates were also calculated based on a methodology presented in *Guidelines for Chemical Process Quantitative Risk Analysis* (AIChE 2000). This methodology uses pressure, temperature, the characteristics of the gas, area of the hole, and other values to calculate release rates. The release rates were then input to Chems-Plus model (Arthur D. Little 1991) to calculate flammable vapor cloud hazard distances and overpressure hazard distances. The distance to an overpressure of 2 psi was utilized as the limiting factor for UVCEs. This is the overpressure that can cause local failure of isolated parts of buildings, collapse of unreinforced masonry load-bearing wall buildings, and possible serious injury or fatality of some occupants.

The specific hazard footprint scenarios for various sections of the facility are described below. Only those that were found to be significant are described.

It was determined that both leaks and ruptures are possible from the piping, valves, and vessels at the facility. The following scenarios were selected to be representative of the accidents that could potentially occur at the facility:

- Rupture of 250 psig pipe.
- Leak from 250 psig pipe.
- Rupture of 45 psig pipe.
- Leak from 45 psig pipe.
- Rupture of the spherical vessel.
- Valve rupture.
- Valve leak.

Rupture of 250 psig pipe – 250 psig piping within the facility includes some 6-inch diameter line, 12-inch diameter line, and 10-inch diameter line. Since there is only about 50 feet of 12-inch diameter line and it connects to the Vintage pipeline through a 6-inch diameter line and to the gas regulating facility through a 1.25-inch diameter line, the flow from a rupture, except for an instantaneous puff, would be restricted by gas flowing through the 6-inch diameter line. Thus, the potential hazard from a release from the 250 psig system has been assumed to be from a rupture of the 6-inch diameter pipe. The potential hazard distances from a rupture of this pipeline were calculated as discussed previously.

Jet flame hazard distance – The length of the jet flame from a rupture of the 6-inch diameter pipe was calculated to be 100 ft.

Flammable gas cloud distance – For stability condition F with 2.2 mph winds, the flammable gas cloud would extend 577 ft. downwind. For stability condition D with 5 mph winds, the flammable gas cloud would extend 173 ft. downwind. If the gas cloud is ignited, either a flash fire or UCVE would occur.

Blast overpressure from an UCVE – For stability condition F with 2.2 mph winds, the 2 psi hazard distance would extend 267 ft from the gas cloud for a total distance of 844 ft. from the release point. For stability condition D with 5 mph winds, the 2 psi hazard distance would extend 131 ft from the gas cloud for a total distance of 304 ft. from the release point.

Leak in 250 psig system – The rate of release from a 1-inch diameter hole would essentially be the same no matter which pipeline or vessel from which the leak occurs.

Jet flame hazard distance – The length of the jet flame from a 1-inch diameter hole was calculated to be 17 ft.

Flammable gas cloud distance – For stability condition F with 2.2 mph winds, the flammable gas cloud would extend 377 ft. downwind. For stability condition D with 5 mph winds, the flammable gas cloud would extend 116 ft. downwind.

Blast overpressure from an UCVE – There would be insufficient gas in the cloud for an UCVE to occur.

Rupture of spherical vessel – The spherical vessel contains approximately 65.5 cubic ft. A rupture of this vessel would release the contents in a relatively short period of time. For analysis purposes it has been assumed the rupture results in gas being released through a 6-inch diameter hole. The rate of release through this hole would be approximately the same as from a rupture of the 6-inch pipeline and thus, the hazard distances from this scenario would be essentially the same as from the 250 psig piping rupture scenario.

Valve rupture – A complete failure of a valve would result in a release rate approximately the same as a release from a rupture of the pipe it is located on. Hence, the pipeline rupture scenarios also represent valve failures.

Valve leak – A leak in a valve on the 250 psig system would produce a flammable gas cloud hazard distance of 102 ft. for the stability condition F with 2.2 mph wind condition and 33 ft. for the stability condition D with 5 mph wind condition. There would be insufficient gas in the cloud for an UCVE to occur.

Probability Analysis and Significance of Accidents and Outcomes

The probabilities of accidents occurring at the gas facility were based on three sources (a report to Santa Barbara County titled *Quantitative Risk Assessment (QRA) for Venoco's Platform Holly and Ellwood Facility* (Arthur D. Little 2000), *Guidelines for Process Equipment Reliability Data* (AIChE 1989), and U.S. Department of Transportation Office of Pipeline Safety (OPS) statistics of gas transmission and distribution pipelines (<http://ops.dot.gov/stats>). All three sources contain information on pipeline failures. After careful review, it was determined that the OPS statistics are most representative of the pipelines within the facility. The OPS data base covers over 2.6 million miles of gas transmission and distribution pipelines. While the vast majority of the pipelines are buried, the data base does include above ground lines similar to those located within the facility. The data base addresses all causes of incidents. Figure 4.12-3 presents the percentage of incidents by cause for distribution pipelines for 2004. The table also includes information on property damage, fatalities, and injuries.

The probabilities used to estimate pipeline incidents were calculated using the OPS data for natural gas distribution pipelines for the 19 year period 1986 through 2004. The total number of incidents during the 19 year period was divided by the total annual pipeline mileage over the 19 year period. This is shown in Figure 4.12-4. Based on historical data and analysis guidelines (Arthur D. Little 2000), 10% of the pipeline incidents were assumed to be ruptures while the other 90% were assumed to be leaks. The pipeline rupture and leak probabilities used in this analysis are presented below.

- Rupture of pipeline – 1.38×10^{-5} per pipeline mile per year
- Small leak in pipeline – 1.2×10^{-4} per pipeline mile per year

The valve and vessel rupture and leak failure rates presented below were taken from Arthur D. Little, 2000 and were developed from a number of sources.

- Rupture of valve – 3.65×10^{-7} per valve per year
- Valve leak – 3.29×10^{-6} per valve per year
- Vessel failure – 1×10^{-6} per vessel per year
- Vessel leak – 1×10^{-5} per vessel per year

The above probabilities have been used to calculate the probabilities of the various accident cases occurring. These probability estimates are presented in Figure 4.12-5. Only those that were found to be significant are identified in the matrix (discussed below).

In addition, analysis was conducted to estimate the probability of gas release ignition. Two types of ignition were considered: a release of gas igniting immediately and a gas cloud igniting after it leaves the facility area. The probability of each of these occurring is dependent on the nature of the surrounding area. In this case, the probability of immediate ignition would be low since there are normally not any ignition sources inside the facility. Potential sources of ignition include sparks if the pipes or equipment are struck by an object or welding equipment if such equipment is being used. Generally, estimates of 5% to 25% are used when estimating the probability of immediate ignition. An estimate of 10%, which is toward the lower end, has been used in this analysis because ignition sources are not normally present.

Presently, the probability that a vapor cloud would be ignited as it moved offsite would also be low because there are very few ignition sources in the area. The greatest potential for ignition would be by a passing vehicle if the cloud were to travel across the road. The potential for ignition would increase if houses are built near the facility since this would introduce additional vehicles and open flames such as barbecues. Also, the farther the flammable gas cloud travels through a residential area, the higher the potential that the cloud becomes ignited because it passes over more ignition sources. To err on the conservative side, it has been assumed that any gas cloud that leaves the confines of the facility will become ignited, i.e., 90% because 10% become ignited immediately. For analysis purposes, it has been conservatively estimated that 10% of vapor clouds ignited will result in an UCVE.

In order to determine level of significance, the Expected Frequency versus Severity of Consequences Matrix (see Figure 4.12.6) was used. This concept classifies expected frequency of occurrence into five categories (frequent, likely, unlikely, rare, and extraordinary) based on a predefined expected frequency of occurrence. Severity of consequence is also classified into five categories (negligible, minor, major, severe, and disastrous) based on the potential safety impact on the public. The significance criteria matrix for this methodology is presented below. The probabilities of the various accidents and their potential impacts are placed in the appropriate cell of the matrix in order to determine the level of level of significance. Incidents that fall in the shaded area of the matrix are classified as significant.

Figure 4.12-3 Distribution Pipeline Incident Summary
(1/1/2004 - 12/31/2004)

Cause	No. of Incidents	% of Total Incidents	Property Damages	% of Total Damages	Fatalities	Injuries
ACCIDENTALLY CAUSED BY OPERATOR	0	0	\$0	0	0	0
BODY OF PIPE	1	.6	\$514,000	1.3	0	0
CAR, TRUCK OR OTHER VEHICLE NOT RELATED TO EXCAVATION ACTIVITY	12	7	\$3,011,880	7.7	1	2
COMPONENT	1	.6	\$0	0	0	1
CONSTRUCTION/OPERATING ERROR	4	2.3	\$636,000	1.6	0	0
CORROSION, EXTERNAL	3	1.7	\$586,571	1.5	1	2
CORROSION, INTERNAL	0	0	\$0	0	0	0
DAMAGE BY OUTSIDE FORCES	22	12.8	\$4,574,356	11.6	1	6
EARTH MOVEMENT	5	2.9	\$3,370,164	8.6	0	1
FIRE/EXPLOSION AS PRIMARY CAUSE	26	15.1	\$5,874,315	15	0	4
HEAVY RAINS/FLOODS	6	3.5	\$2,033,830	5.2	0	1
HIGH WINDS	0	0	\$0	0	0	0
INCORRECT OPERATION	6	3.5	\$141,429	.4	0	8
JOINT	3	1.7	\$945,900	2.4	2	1
LIGHTNING	0	0	\$0	0	0	0
MISCELLANEOUS	10	5.8	\$1,763,637	4.5	2	6
OPERATOR EXCAVATION DAMAGE	1	.6	\$0	0	0	0
OTHER	12	7	\$3,543,000	9	4	2
RUPTURE OF PREVIOUSLY DAMAGED PIPE	1	.6	\$515,000	1.3	0	0
TEMPERATURE	2	1.2	\$400,000	1	3	1
THIRD PARTY EXCAVATION DAMAGE	48	27.9	\$10,185,424	25.9	0	4
UNKNOWN	7	4.1	\$1,028,400	2.6	4	2
VANDALISM	2	1.2	\$160,000	.4	0	0
TOTAL	172	100.0	\$39,283,906	100.0	18	41

Figure 4.12-4 OPS Distribution Pipeline Accident Data by Year

YEAR	MILES	NO. INCIDENTS	INCIDENTS PER MILE
1986	780,401	142	1.82E-04
1987	802,335	163	2.03E-04
1988	866,639	201	2.32E-04
1989	838,237	177	2.11E-04
1990	945,964	109	1.15E-04
1991	890,876	162	1.82E-04
1992	891,984	103	1.15E-04
1993	951,750	121	1.27E-04
1994	1,002,669	141	1.41E-04
1995	1,003,798	97	9.66E-05
1996	992,860	110	1.11E-04
1997	1,002,942	102	1.02E-04
1998	1,040,765	137	1.32E-04
1999	1,035,946	118	1.14E-04
2000	1,050,802	154	1.47E-04
2001	1,101,482	124	1.13E-04
2002	1,136,411	102	8.98E-05
2003	1,097,872	146	1.33E-04
2004	1,225,820	172	1.40E-04
1986-2004	18,659,553	2,581	1.38E-04

Figure 4.12-5 Probability of Accidents at the Gas Company Piru Facility*

Accident	Length/ Number	Annual Probability
Rupture in 250 psig piping	610 ft.	1.6×10^{-6} Every 630,000 yrs
Leak in 250 psig piping	610 ft.	1.4×10^{-5} Every 72,000 yrs
Rupture of vessel	1	1×10^{-6} Every million yrs
Leak in vessel	1	1×10^{-5} Every 100,000 yrs
Rupture of 250 psig valve	7	2.6×10^{-6} Every 390,000 yrs
Leak in 250 psig valve	7	2.3×10^{-5} Every 43,000 yrs

* Only those accidents that are considered to be significant are shown.

Figure 4.12.6 Expected Frequency vs. Severity of Consequences Matrix

		SEVERITY OF CONSEQUENCE				
		Negligible: No Significant risk to the public, with no minor injuries	Minor: Small level of public risk, with at most a few minor injuries	Major: Major level of public risk with up to 10 severe injuries	Severe: Severe public risk with up to 100 severe injuries or up to 10 fatalities	Disastrous: Disastrous public risk involving more than 100 severe injuries or more than 10 fatalities
FREQUENCY OF OCCURRENCE	Frequent: Greater than once a year					
	Likely: Between once a year and once in one hundred years					
	Unlikely: Between once in a hundred and once in ten thousand years					
	Rare: Between once in ten thousand years and once in a million years					
	Extraordinary: Less than once in a million years					



Defined as significant impacts

Source: County of Santa Barbara Department of Resource Management, Environmental Thresholds & Guidelines Manual, Amended 1995

Below are listed the significant equipment incidents and impacts (if a specific piece of equipment is not considered significant, it still may be included as it may be one part of a portion of equipment that is significant):

Rupture of 250 psig pipe with flash fire – Annual probability = (prob of rupture) x (prob of delayed ignition) = $1.6 \times 10^{-6} \times 0.9 = 1.3 \times 10^{-6}$ (once in 790,000 years). The frequency of occurrence for this scenario is classified as "rare" according to the matrix. The size of this hazard distance is up to 577 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "rare" and "severe" results in a significance classification of "significant".

Rupture of spherical vessel with flash fire – Annual probability = (prob of rupture) x (prob of delayed ignition) = $1 \times 10^{-6} \times 0.9 = 9 \times 10^{-7}$ (once in 1.1 million years). The frequency of

occurrence for this scenario is classified as "extraordinary" according to the matrix. The size of this hazard distance is up to 577 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "extraordinary" and "severe" results in a significance classification of "not significant". Nevertheless, though not significant, its probability is included in the 250 psig portion.

Rupture of 250 psig valve with flash fire – Annual probability = (prob of rupture) x (prob of delayed ignition) = $2.6 \times 10^{-6} \times 0.9 = 2.3 \times 10^{-6}$ (once in 430,000 years). The frequency of occurrence for this scenario is classified as "rare" according to the matrix. The size of this hazard distance is up to 577 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "rare" and "severe" results in a significance classification of "significant".

Leak in 250 psig pipe with flash fire – Annual probability = (prob of leak) x (prob of delayed ignition) = $1.4 \times 10^{-5} \times 0.9 = 1.3 \times 10^{-5}$ (once in 79,000 years). The frequency of occurrence for this scenario is classified as "rare" according to the matrix. The size of this hazard distance is up to 377 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "rare" and "severe" results in a significance classification of "significant".

Leak in spherical vessel with flash fire – Annual probability = (prob of leak) x (prob of delayed ignition) = $1 \times 10^{-5} \times 0.9 = 9 \times 10^{-6}$ (once in 110,000 years). The frequency of occurrence for this scenario is classified as "rare" according to the matrix. The size of this hazard distance is up to 377 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "rare" and "severe" results in a significance classification of "significant".

Leak in 250 psig valve with flash fire – Annual probability = (prob of leak) x (prob of delayed ignition) = $2.3 \times 10^{-5} \times 0.9 = 2.1 \times 10^{-5}$ (once in 48,000 years). The frequency of occurrence for this scenario is classified as "rare" according to the matrix. The size of this hazard distance is up to 377 ft. depending of the atmospheric conditions present so it is possible that members of the public could be impacted by this scenario. According to the matrix, the severity of consequence would be classified as "severe" if the area around the facility were developed with residences. The combination of "rare" and "severe" results in a significance classification of "significant".

The above analysis shows that a rupture or leak in the 250 psig portion of the facility (pipeline, valve, and spherical vessel) with resulting flash fire could result in a significant safety impact to members of the public. The probability of a rupture in the 250 psig portion of the facility is 4.5×10^{-6} (once in 220,000 years). The probability of a leak is 4.3×10^{-5} (once in 23,000 years). These are extremely low probabilities of occurrence and near the bottom of the classification matrix. Such accidents would produce flammable vapor clouds that, if ignited, could produce flash fires that would burn rapidly back to its source. Members of the public located within such cloud could sustain severe burns and possibly fatalities.

It is noted here that the risk from this facility is no more than is experienced by populations located near gas transmission and distribution lines which are located throughout the country. For example, in the Piru area there is a 12-inch diameter high pressure gas pipeline buried along SR-126, a 6-inch diameter gas distribution pipeline buried along Main St. from SR-126 to the gas facility, and a 12-inch diameter Vintage owned gas pipeline running along Main St. The 12-inch diameter pipelines would

present both a greater probability of a release (because of their greater length) and potential hazard distance (because their larger diameter) than the gas facility being analyzed here.

Telephone Service

The increase in demand for telephone services from the development associated with the Piru Expansion Area will impact SBC's facilities and equipment. Currently there are insufficient phone lines, conduit structures, manholes, and utility boxes. To compensate for the impacts, SBC will need to provide this equipment. SBC's central office in Piru will not be significantly impacted by the proposed development (Bob Demyan, SBC, Jan. and June 2005).

Cumulative Impacts

As mentioned in the Project Description, development in addition to the proposed project is likely to occur. The following impacts should be considered.

Gas Safety

The development of the community's residential lots, commercial/industrial land, planned farmworker units associated with Cabrillo Economic Development Corp., and UWCD's expanded recreational facilities and the proposed Rancho Temescal development will not result in need to expand or significantly alter the Piru gas facility (PJ Martin, SC Gas Co., Dec. 2005). Thus, there should be no significant cumulative health, odor, or safety impacts.

Telephone Service

The current and future development planned for Piru will increase the need for additional phone lines, conduit structures, etc. SBC will provide such equipment, with the costs being borne by developers and users of this service. Thus, impacts will be self-mitigating.

General Plan and Area Plan Policies

The General Plan *Goals, Policies and Programs* and *Piru Area Plan* were reviewed for their applicability to the proposed project. The project was determined to be consistent with all of the relevant goals and policies, with respect to gas safety and telephone service.

4.12.3 Mitigation Measures

GS-1 To reduce the risk to residents from a flash fire from a rupture or leak of the 250 psig portion of the facility (pipeline, valve, and spherical vessel), one of the following measures shall be employed prior to recordation of the Component B Tract Map:

- Add a leak detection and automatic shutdown system to the Gas Company facility, or
- Move the Gas Company facility to another site south of Highway 126.

At the present time, the gas receiving facility is equipped with systems that continuously monitor the pressure in the receiving pipeline and the H₂S content of the gas. If high pressure is detected or a high H₂S concentration is detected, a valve on the receiving pipeline near where it enters the facility is automatically closed. This system could be enhanced to rapidly detect releases and close the pipeline in several ways. First, a low pressure sensor could be added that would automatically close the valve if a rapid drop in pressure, as would happen in a large release, is detected. Second, gas detectors could be placed around the perimeter of facility that would automatically close the valve if high concentrations of gas consistent with a large release are detected. One or both of these systems would rapidly close the valve and shut off the stream of gas from the Vintage pipeline from entering the facility. While an initial puff of gas would be released, the rapid closing of the valve would prevent a large volume of gas being released thereby preventing a large flammable cloud from migrating into the surrounding area. It is felt that this mitigation measure can reduce the overall public safety impact to "not significant." It is recommended that, if this mitigation measure is implemented, the Gas Company develop and present the design of the leak detection system to the County for review and approval. It

has been roughly estimated by the Gas Company that it would cost approximately \$50,000 to design and implement such a system.

Moving the Gas Company facility to another location that would be located at least 577 feet from existing or planned residential development would necessitate that the facility would have to be moved south of Highway 126, within or adjacent to the industrially designated area. To accomplish this, all the existing piping, vessels, valves, etc. would have to be relocated and the Vintage 12-inch diameter pipeline would have to be extended to reach the relocated facility. In addition, Gas Company pipelines providing gas to the facility and leaving the facility to service the area would have to be constructed. The Gas Company would be responsible for relocating the facility and their pipelines, while Vintage would be responsible for extending their pipeline. Necessary right-of-ways would need to be obtained. It has been estimated by the Gas Company that it would cost approximately \$250,000 to relocate the facility if it were not moved more than about a mile distant from its current location.

4.12.4 Residual Impact

There is the potential for very occasional, minor odor emissions impacting the residential lots located within 175 feet of the SC Gas regulator/transmission facility. ~~In addition, any potential impacts from the mitigations themselves could likely be reduced to less than significant levels. These odor emissions would occur primarily during periodic maintenance operations.~~

While no significant odor impacts should occur during normal operations of the site, notification to homebuyers to the existence of the SC Gas regulator/transmission station and the potential for minor odor impacts from that facility should be provided for the residential lots owners of homes located within 175 feet of the SC Gas regulator/transmission station is recommended to ensure that future homeowners are aware of potential odor issues.

4.13 Law Enforcement and Emergency Services

This chapter addresses the impacts of the proposed project on law enforcement services, personnel, equipment and facilities and includes a discussion regarding disaster response preparedness within the community of Piru.

The County Initial Study Guidelines define law enforcement personnel as both sworn Deputy Sheriffs and non-sworn support personnel used to protect the citizens of Ventura County, as they relate to the Sheriff's jurisdiction. Equipment consists of those items used by Sheriff's personnel in the performance of their duties. A law enforcement facility is defined as a building used to house the personnel and equipment of the Sheriff for the purpose of performing their duties of protecting the citizens of the county.

For purposes of this analysis the assessment of project and cumulative impacts on law enforcement services is based upon the existing staffing level of the County Sheriff's Department with respect to existing and projected population levels. To maintain an acceptable level of police protection, the Sheriff's Department currently provides one patrol officer per 1,270 population. If this standard cannot be maintained, a significant impact on law enforcement would occur.

Currently, all patrol facilities are, on an average, approximately 19.5 miles apart. In considering the need for additional facilities, the Sheriff's Department's takes into consideration subjective variables (calls for service, area to be served and response times) in that evaluation.

No existing county threshold standards exist for emergency services. For the purpose of this EIR it is assumed that any project that would exacerbate a population's exposure to emergency conditions, exceed the capacity of police, fire or other emergency services or facilities (including an emergency shelter) or result in residents inability to safely reach an emergency shelter in an emergency condition, would constitute a significant emergency service impact.

4.13.1 Environmental Setting

A summary of the environmental setting for law enforcement and emergency services follows:

Law Enforcement

The Ventura County Sheriff's Department provides law enforcement service to all unincorporated areas of Ventura County, including the Piru Community. Through contractual agreements, the Sheriff also provides law enforcement services for the cities of Thousand Oaks, Camarillo, Ojai, Moorpark and Fillmore. The Sheriff's Department is headquartered in Ventura and maintains stations in Camarillo, Fillmore, Lockwood Valley, Moorpark, Ojai and Thousand Oaks. The Piru Community is within the West County Patrol Division, which operates out of a Sheriff's facility located in Fillmore. As of October 2005, the Sheriff's Department was budgeted for 742 sworn officers (81 positions were unfilled).

Through a mutual aid agreement, backup law enforcement service is provided by the Los Angeles County Sheriff.

The Sheriff is also responsible for the operation of County jails and provides courtroom security.

Piru is located within the West County Patrol Division. The West County Patrol provides law enforcement services to the City of Fillmore and 450 square miles of unincorporated territory within the Santa Clara Valley between Cummings Road (between the cities of Ventura and Santa Paula) and the Ventura/Los Angeles County line to the east.

According to statistics maintained by the Sheriff's Department, the Piru Area of Interest reports a five-year average of 274 offenses per year, of which an average of 103 incidents occur within the Piru Community. The crime rate for Piru averages 7.75 reported Part I crimes (violent and property crime incidents) per 1,000 population. This compares favorably to the 2004 countywide crime rate of 16.49 Part I crimes per 1000 population.

A community resource officer was stationed in a local storefront in Piru for 40 hours a week to meet the community's police needs. However, the position was eliminated in 2003 due to County budget cuts. In 2004, the Sheriff's department further reduced the number of night-time patrol officers.

The population of Piru has been expanding without any additional law enforcement services. Within the past few years, the following residential developments including: the Rancho Sespe farmworker housing project (520 residents), Colina Vista Apartments (200 residents), Habitat for Humanity tract, and the Citrus View tract residents, have been largely responsible for this increase in population. In addition, the Lake Piru Recreation Area is undergoing expansion and improvements and will be able to service greater numbers of visitors during the summer and holidays. The Lake Piru Recreation Area stresses Sheriff Dept. resources during peak summer hours due to sheer volume, isolation, and limited radio contact. Lake Piru receives 4,500-5000 visitors on holidays and summer weekends. The Sheriff's Department reports that this residential and recreational growth has occurred while the law enforcement presence in Piru has been reduced.

The California Highway Patrol (CHP) is responsible for investigation of all traffic accidents occurring with the unincorporated area of Ventura County. However, when an accident occurs on these roads, the CHP usually requires law enforcement assistance from the County Sheriff's Department in the form of traffic control, first aid, witness statements, etc. As of January 2005, there was 38 California Highway Patrol officers, stationed at the Moorpark CHP facility.

Emergency Services

According to County Ordinance 2538, the Sheriff is the Director of Emergency Services and during incidents of natural disaster, becomes the coordinator of County and State requested resources. Emergency Services planning in Ventura County is conducted in the Sheriff's Department, Support Services Division, Office of Emergency Services (OES). The overall goal of the OES is to save lives and protect property by developing programs and emergency operational capabilities that mitigate, prepare for, respond to, and recover from any emergency or disaster—whether peacetime or war-related.

Local government is recognized as the first line of official public responsibility for emergency management activity. In a disaster, State and Federal Governments can be counted on for major support only when damage has been unusually widespread and severe. The role of the OES, as the focus of the planning effort, is to develop and maintain an ongoing program of mitigation, preparedness, response, and recovery. It is not a separate unit or action group set apart from the normal functions of government, standing by to "save the day," in the event of an emergency. The OES serves the Board of Supervisors and Chief Administrative Office by working with the departments of local government and private sector organizations in the development of plans and capabilities responsive to those hazards which seriously threaten the jurisdiction. Prior to a crisis, hazard mitigation programs can reduce the vulnerability of people and property. In a crisis, effective response is often a result of what has been accomplished prior to the emergency.

Emergency Response Plans are prepared for a number of natural and man-made disasters, including: earthquakes, floods, tsunamis/seiches, wildland fire, hazardous materials, landslides, dam failure emergency, nuclear defense/radiological and transportation accidents (involving airplanes, boats, major highway accidents, and railroads).

As part of this planning, the OES coordinates with the Red Cross, which has developed and maintains an inventory of facilities for shelter; the Red Cross also supplies shelters with necessary materials to function. The OES will assist in supplying shelters with additional materials (if necessary) and helps to identify evacuation routes for and during disaster events. Although Piru Elementary School has been used as an evacuation center (January 2005 storm event), neither Piru nor the nearby City of Fillmore has formal, established evacuation centers that contain sufficient bedding, sanitation, food, etc. The OES prefers to consider the particular disaster event as its happening, coordinating with the Red Cross to determine the safest and best place to shelter the residents from the its inventory of sites.

Earthquake Emergency

While there are no known active faults underlying Piru, all of Southern California is tectonically active and subject to earthquake hazard. All of Piru is located within a relatively high groundshaking hazard area¹² and most of the town is subject to liquefaction¹³ hazard. Extensive damage occurred in Piru during the Northridge earthquake in 1994. Many of the commercial buildings in Piru were reinforced after the 1994 earthquake. New construction is subject to UBC requirements that are designed to protect structures from earthquake hazards. UBC requirements were strengthened after the 1994 Northridge earthquake. Nonetheless, older buildings in Piru that were not reinforced after the 1994 earthquake could be at risk during future earthquake events.

Flood Emergency

The eastern portion of Piru is within the 100-year flood hazard of Piru Creek, while portions of Piru (west of Camulos Place) are within the 100-year flood hazard of Warring Wash.

In January 2005, Ventura County experienced severe flooding, which resulted in significant loss of life and property damage. The fatal mudslides of La Conchita received much of the media's attention; nevertheless, Piru was seriously impacted by these floods. Piru was cutoff from incoming and outgoing traffic as Highway 126 was blocked to the east (at LA County line) and west (at Hopper Canyon) by water, mud, and debris.

The impacts of the 2005 flood incident in Piru began January 9, 2005. Flooding occurred at Main Street and Center Street. Additionally, there were concerns that the large release of water and debris from Santa Felicia dam could result in localized flooding over the banks of Piru Creek. Many residents temporarily re-located to Piru Elementary apparently based upon advice of the Sheriff's Department OES, as-a-precaution. (Piru uses its Elementary School as a shelter/assembly point in the event of flooding as it is located at a higher elevation than most of the community.) Piru elementary school was closed to students during this storm event. In addition, there were power outages in the area. By January 11, residents returned to their homes; though the dam continued to release excess water and debris through its spillway, the flood alert was cancelled. During this incident, the multi-agency Emergency Operations Center assessed the disaster as it happened, identified evacuation routes, and coordinated with the Red Cross as to which shelter/assembly site to use for its citizens. The Los Angeles Red Cross brought in food from Santa Clarita area when Highway 126 was opened heading east from Santa Clarita. No official evacuation was recommended or required by any government authority.

Much of the sheltering of Piru's citizens during this time was directed and coordinated by Janet Bergamo of the Piru Neighborhood Council. The evacuation routes of Center Street and Main Street are established evacuation routes and were utilized during this event. According to Ms. Bergamo, approximately 600 people went to Piru Elementary as a precautionary measure. Evacuees brought their own food and bedding (there are no evacuation beds on site), and they spent the night in the school cafeteria, the classrooms, and in their cars (at the school grounds). Piru Elementary may have been able to house an additional 300 evacuees.

Ms. Bergamo reports that food and water became an issue during Piru's isolation, as local supplies were reduced and roads remained closed. During their isolation, the Sheriff's Search & Rescue team brought food from McDonald's and Vons (in Fillmore) the night of the evacuation. Extra water was brought to those in the community by Search and Rescue and by some of the evacuees themselves.

¹² Groundshaking hazards in Ventura County are ranked from 0.35 to 1.05, with 1.05 having the worst potential for horizontal ground movement during an earthquake event. Piru is rated at 0.95.

¹³ During earthquakes, or shortly after, shaking of the ground may cause a loss of strength and stiffness that can result in the settlement of buildings. This process is known as liquefaction. Liquefaction occurs in saturated soils, that is, soils in which the space between individual particles is completely filled with water. This water exerts a pressure on the soil particles that influences how tightly the particles themselves are pressed together. Prior to an earthquake, the water pressure is relatively low. However, earthquake shaking can cause the water pressure to increase to the point where the soil particles can readily move with respect to each other.

American Red Cross personnel reported that within 3-4 days of Piru becoming isolated, their mobile food unit was able to drive in from Santa Clarita (east of town) and relieve many of the citizens. The Red Cross had no requests to provide water to the community and that severe water shortages were not a problem.

Ms. Bergamo states that some coordination and communication problems between the CHP, the Sheriff's Office, and Caltrans resulted in confusion about how passable the roads were and who was permitted to leave Piru in an emergency. In one case, a Piru citizen whose mother was in desperate need of dialysis had to get permission from Fire Station 16 to go to Santa Clarita. The road was passable, but CHP/Caltrans subcontractors did not want to let them through.

The Watershed Protection District has plans for a storm drain improvement project that will add to and increase the size of the drain system on Main, Orchard, and Center streets. This will reduce the potential for flooding in the more established, northern portion of town. Construction is anticipated in 2006. Once complete, the flooding and mud flows experienced at Main Street and Center Street should be prevented during future storm events.

Dam Inundation Emergency

Virtually the entire Piru Community as well as the proposed expansion area is within the Dam Inundation zone for Santa Felicia, Pyramid and Castaic dams.

Santa Felicia Dam, an earth dam owned by United Water Conservation District, contains the water of Lake Piru above the community of Piru. This dam is closest to the Piru Community. While the prospects of dam failure are generally considered to be very remote, the possibility of such an event cannot be taken lightly in view of the widespread potential for damage and loss of life. A sudden catastrophic failure of this dam would provide Piru residents with only a maximum of 18 minutes notice to evacuate to Piru Elementary School. Piru School is the assembly/safety location in the unlikely event of a failure of Santa Felicia dam. Piru practices its dam failure alert system by regularly sounding its warning siren.

The Countywide General plan states that because of existing development patterns and trends, particularly in the south half of the County, and the large amount of land area that is potentially subject to dam inundation, it would be infeasible to preclude future development from locating in dam inundation areas.

During the January 2005 floods (discussed above), the release of large volumes of water and debris from Santa Felicia dam alerted the community to the possibility of flooding over the banks of Piru Creek. It was thought that if enough of the debris flowed over the dam spillway, then it could jam in the creek bed and could flood parts of town. While creek flooding was a credible concern, there was never a risk of Santa Felicia dam failing or rupturing. Thus, emergency services were not impacted by threat of dam failure; rather, they were affected by the potential perceived risk of flooding.

Wildland Fire Emergency

The area north of and east of Piru is within a high fire hazard area and historically has burned 17 times since 1950, on average about every 3 years. The most recent wildland fires occurred in 2003 (Verdale and Piru fires).

Other Emergencies

Piru could be impacted by transportation (aircraft, rail or highway) related incidents. While an aircraft accident is always a remote possibility, Piru is not located near any airports.

The town is bifurcated by railroad tracks, but the tracks do not currently carry any rail traffic are only used on an occasional basis by Fillmore & Western Railroad. Thus the risk of a railroad related incident is currently very limited, non-existent. The Ventura County Transportation Commission (VCTC) hopes to restore the rail line east of town to Castaic Junction. This would facilitate future passenger train service and tourist train service by the Fillmore & Western Railway. Thus, future conditions could expose Piru to an increased potential risk with respect to railroad related transportation incidents.

Highway 126 is currently the Piru Community's only transportation connection to the outside world. A major accident or hazardous spill along Highway 126 could severely impact the community's ability to travel outside the community. The community's reliance upon this arterial was dramatically illustrated during the storm events of January 2005.

4.13.2 Impacts

Project Impacts:

Law Enforcement Impacts

In general, additional development of the proposed project will exacerbate the need for additional Sheriff's personnel, equipment and facilities.

With regard to crime enforcement, the development projects will generate an estimated 1,442 new residents for the Piru Community and thus would require slightly more than one new patrol officer, if the current "one officer per 1,270 residents" level of service standard is to be maintained. According to Captain Randy Pentis, at the current staffing levels, depending on the demand for services on any particular day, this project could significantly impact law enforcement services.

Resources can be drawn from other areas in the county, but there could possibly be an extended response time for service, sometimes up to 30 minutes to an hour or more. The areas that would be drawn would also be impacted because of the minimum deployment at those locations.

The Fillmore Police Station is located approximately 8 miles distance and about eleven minutes travel time without using sirens and flashing lights (according to MapQuest.com). The existing station is well within the 19 mile average for Ventura County.

As discussed previously, the California Highway Patrol has a new facility in Moorpark with a staff of approximately 38. According to Highway Patrol staff the existing personnel are adequate to provide continued traffic enforcement service under project and cumulative development conditions. Thus, the proposed development will have a less than significant impact on traffic enforcement.

Emergency Services

The proposed new development will be subject to the same kinds of potential emergency hazards as the existing community (fire, flood, dam inundation, earthquake, and transportation related hazards). To some degree the new development will be better protected as development must be designed to be protected from the 100-year flood event, and new buildings must be constructed in accordance with the current UBC requirements with respect to earthquake fire safety requirements.

In the event of a flooding or dam inundation emergency, Piru School is the designated assembly point for the Piru Community. The projected increase in population could significantly increase the number of people that potentially may need to gather at Piru School under emergency conditions. The Red Cross and OES use a general figure for disasters (flood, fire, earthquake, etc.) that assumes between 20 percent to one-third of the affected population may need evacuation beds. Currently, the estimated number of Piru residents that live in the 100-year flood hazard zones is 635. Using the Red Cross and OES standards there should be room for 127 to 212 evacuees in an assembly site/evacuation center. As mentioned above, Piru Elementary School can shelter 600-900 evacuees.

The Rieder and Levy components are currently located in the 100-year flood hazard area. Using the Red Cross and OES standards the Piru School theoretically would need to accommodate an additional 120 to 200 evacuees which is within the capacity of Piru School. Janet Bergamo reports that up to 50% of the residents of Citrus View Subdivision evacuated during the 2005 storm event. Based upon the percentage of Citrus View Subdivision residents who evacuated to Piru School during the 2005 storm event, Ms. Bergamo believes that the Rieder and Levy developments may generate up to 328 evacuees. Under Ms. Bergamo's calculation, the potential number of evacuees would slightly exceed the capacity of Piru School (assuming 600 existing residents and 328 new residents would try to evacuate to Piru School. Additionally, Flood Control Ordinance regulations require that new development be protected from the 100-year flood hazard. Therefore, the proposed development would not contribute to the need for additional emergency shelter space during a flooding event if the

percentage of evacuees from the Piru Expansion Area is the same as the Citrus View subdivision experienced in 2005.

Notwithstanding the Red Cross and OES standards, it is noted that during the January 2005 storm event an estimated 600 residents (35% of the Piru Community) reportedly took shelter at Piru School. due to perceived fear of flooding

It must be noted that in a catastrophic dam failure emergency, the entire community including the proposed Piru expansion are would need to be evacuated to high ground. Under such a scenario Piru School would be inadequate under the current condition to house the entire Piru population for any length of time. Presumably, once the immediate danger was over, some residents would have to be re-located to other emergency shelters located outside the dam inundation area or temporary tent shelters would need to be established.

Under this (catastrophic dam failure emergency) situation, some Piru residents have expressed concern that the location of the proposed new housing at a relatively greater distance from Piru School would place these new residents in danger if they could not travel walk to Piru School within the maximum 18 minutes warning period before floodwaters from Lake Piru would reach the Piru Community.

Evacuation of the entire community by automobile under a catastrophic dam failure emergency would choke local streets and create a challenge to find parking near Piru School. Piru School can accommodate only 60 to 70 vehicles. Center Street (west of Warring Wash) can accommodate an estimated 150 vehicles. Additional parking in an emergency could be accommodated on the La Verne Nursery property, along Real Canyon Road and at the Piru Cemetery. Assuming at least one vehicle per family within the Piru Community and the proposed Piru Expansion Area, it may be necessary to park 900 or more vehicles along west Center Street. While evacuation by automobile may be physically possible given sufficient time and organization, with a maximum 18-minute time constraint and a panicked populous, access to Piru School by automobile may not be feasible.

Under these difficulties, some residents would likely need to evacuate to Piru School on foot. Average walking speed for healthy adults on a treadmill is 3.5 miles per hour. Average walking speed for seniors over 70 years old is 2.7 miles per hour. The maximum distance from Piru School walking via Main Street and Center Street for each component ranges from 0.5 to 0.9 miles as indicated in the table below. Therefore, given a minimum 18 minutes notice, most healthy adults would be able to manage an evacuation by foot even if they lived at the extreme edge of the proposed development. However, it is acknowledged that the elderly, the very young and the infirm may need to be evacuated by vehicle from portions of the County of Ventura component (Thompson property). While the potential for catastrophic dam failure is considered extremely remote, development of the most distant portion of the Piru Expansion Area (Thompson property) would not allow evacuation by foot for persons of limited mobility. In a catastrophic dam failure emergency, residents of the Thompson property may be safer if they were to flee by automobile via Highway 126 to Rancho Camulos (or Val Verde if Castaic Lake Dam fails). This very remote impact would be significant for those families with individuals who have limited mobility.

Component	Maximum Distance From Piru School	Walking Speed Necessary to Arrive at Piru School in 18 Minutes
John Rieder	2,650 feet (1/2 mile)	1.7 mph
James Finch	3,300 feet (5/8 mile)	2.1 mph
Dana Levy	3,500 feet (2/3 mile)	2.2 mph
County of Ventura (Thompson Property)	4,900 feet (9/10 mile)	3.1 mph

The inability of some residents to walk to the high ground within 18 minutes may be considered to be an adverse impact; however, the risk of dam failure is considered extremely remote. Therefore, this potential impact is not regarded as significant and does not require mitigation.

Additionally, current residents of the Piru Expansion Area have reported that they are unable to hear the dam warning siren when windows are closed. Requiring double-paned windows for noise mitigation (Mitigation Measure N-6 and N-7) could exacerbate this condition. Existing warning sirens are located at the fire station (Church Street at Camulos Street) and in the Camulos orchard property, east of the Citrus View tract.

OES reports that in the event Piru residents had to be evacuated due to a major wildfire, residents would likely be directed to shelters in Fillmore or Santa Clarita, depending upon the nature and type of emergency. Because of its proximity to high fire hazard areas, Piru School is not considered to be a viable assembly/evacuation site in the event of a wildland fire near the community.

An existing County fire station is located on Church Street, approximately ¼ mile from the Reider project site and a maximum of 0.6 miles from the other portions of the proposed Piru Expansion Area. Ventura County Fire Protection District (VCFPD) concluded that the distance from the existing fire station was adequate and found that the project did not require a new fire station or additional fire fighting equipment. Therefore, the VCFPD concludes that the project impact is expected to be less than significant on distance, response time, facilities, equipment, and staff.

Cumulative Impacts

Cumulative Law Enforcement Impacts

Cumulative development could generate an additional 1,048 1,757 persons, which added to the 1,442 project-generated residents, would require ~~two~~ 2.5 additional patrol officers, if the current one officer per 1,270 residents level of service standard is to be maintained. Therefore, cumulative development would result in a significant impact on law enforcement, unless additional law enforcement personnel are provided.

Cumulative Emergency Services Impacts

With respect to emergency services, the additional cumulative population will be protected from 100-year flood hazard as required by County Flood Control regulations. However, Therefore cumulative development will ~~not significantly impact~~ exacerbate overcrowding of Piru School as an emergency flood shelter. During a catastrophic dam inundation emergency, population generated by cumulative development would also need to gather at Piru School. As stated above, Piru School would not be adequate to house the entire population of Piru (much less project and cumulative development) for any length of time. Under this extremely remote scenario, once the immediate emergency is over, some residents would have to be re-located to other emergency shelters or temporary tent shelters. The risk of dam failure is considered extremely remote. Nonetheless the potential impact on Piru School as an emergency shelter during such an event may be considered to be an significant adverse impact. ; ~~however, the risk of dam failure is considered extremely remote. Therefore, this potential impact is not regarded as significant and does not require mitigation.~~

General Plan Consistency

The General Plan *Goals, Policies and Programs* and the Piru Area Plan were reviewed for their applicability to the proposed project. The project was determined to be consistent with all of the relevant General Plan goals, policies, with respect to Law Enforcement and Emergency Services.

4.13-2 Mitigation Measures

Mitigation for Law Enforcement

LE/ES-1 ~~The Sheriffs Department shall reinstate the Community Resource Officer within the Piru Community. Prior to recordation of any tract map in the Piru Expansion Area a County Service Area (CSA) or Community Services District (CSD) shall be formed to provide additional tax support for one Piru Community Sheriff's Officer. Developers shall coordinate with the Piru Neighborhood Council, the Local Agency Formation Commission (LAFCO) and the Sheriff's Department to determine the most appropriate long-term mechanism to fund a Community Resource Sheriff's Officer for the Piru Community. If the Piru Community desires formation of a communitywide special~~

district (e.g., a County Service Area or Community Services District) developers shall pay the cost of formation of such a District. Alternatively, developers may elect to form a Community Facilities District (CFD), with authorization by the Board of Supervisors.

Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. (Component A: 60 = 15.23%, Component B: 104 = 26.40%, Component C: 185 = 46.95%, and Component D: 45 = 11.42%).

In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with the creation of a special district with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps.

Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component

Funding of law enforcement costs is the responsibility of the Board of Supervisors. Proposition 172 and County Ordinance 4088 give the Sheriff's Department a guaranteed share of the County sales tax which gives the Sheriff's Department and other public safety departments a measure of stability not enjoyed by County Government in general. Notwithstanding this, budget cuts in recent years have substantially reduced the law enforcement presence in the Piru Community. The most visible loss is the loss of the Piru Community Resource Sheriff's Officer. This full-time, 40-hour a week Deputy acts as a liaison between the Sheriff department and the community to resolve conflicts and criminal problems. The cost of a deputy would be approximately \$180,000 a year, which includes all benefits. Development of the Piru Expansion Area is estimated to generate at least \$1.35 million¹⁴ in new property tax annual revenues. Based upon current County budget spending levels, approximately 6 percent or \$80,940 of this new property tax revenue is expected to be available to the Sheriff's Department for police services. ~~If the balance of the needed funds is derived from a CSA or CSD, The~~ approximate cost per household would be up to \$110 per year, if the entire community participates in the CSA/CSD cost of this service. ~~If only the new development participates, the cost would be up to \$251 per household each year.~~

LAFCO staff indicate that a CSA or CSD is legally precluded from providing services planned to benefit an area outside the proposed district. Therefore if a CSA or CSD is formed for this purpose it would have to be a communitywide district. It is unknown whether the Piru Community would be willing to provide financial support for added law enforcement service. It is also unknown whether LAFCO would approve such a district based upon its determination of financial feasibility and compliance with LAFCO policies or whether the Board of Supervisors would be willing to commit funds for this purpose, regardless of whether or not the proposed development generates sufficient property tax revenues to offset the increased Sheriff's costs. It is noted that formation of a CFD for the Piru Expansion Area could fund law enforcement services for the community. However, the County has historically opposed the use of CFDs if other mechanisms are available and there is no overriding public benefit. This is because the County's name is on the bonds and, although the County is not directly liable in the case of default, the County's overall bond credit rating can be adversely affected in such cases.

Therefore, the political and financial feasibility of forming a CSA/CSD or CFD special-district this measure cannot be determined.

¹⁴ This assumes average home values as stated by the applicants (\$280,000 to \$320,000 for the Rieder component and \$350,000 for the Levy component) and assumes \$350,000 per average dwelling unit for the Finch and County of Ventura components. It is likely that these estimates understate the actual home values. Higher home values would have the effect of increasing the property tax revenue and reducing the amount required to be collected by the CSA/CSD. The estimated breakeven point would be reached if the average home value in the Piru expansion area is \$761,400.

Recommended Mitigation for Emergency Services

- LE/ES-2** Prior to recordation of any tract map in the Piru Expansion Area, developers shall fund construction of a storage facility at Piru School along with tents, cots, blankets and 3-day emergency food and water supply for 200 evacuees. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. (Component A: 60 = 15.23%, Component B: 104 = 26.40%, Component C: 185 = 46.95%, and Component D: 45 = 11.42%).
- LE/ES-3** Prior to recordation of any tract map for the Thompson property, an emergency evacuation plan for residents of this area shall be developed. This plan may include construction of a shorter pathway to Piru School (e.g. along the Warring Wash right-of-way), construction of an emergency access road connecting the Thompson development to West Center Street, or other means acceptable to the County that would improve the residents safety in the event of a catastrophic dam failure emergency.
- LE/ES-4** Prior to recordation of tract maps in the Piru Expansion Area, developers shall provide funds to the United Water Conservation District to install an additional emergency warning siren. Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. (Component A: 60 = 15.23%, Component B: 104 = 26.40%, Component C: 185 = 46.95%, and Component D: 45 = 11.42%).

Measure LE/ES-2 would ensure that if another storm event occurred in Piru, similar to the 2005 event, there would be sufficient shelter space at Piru School and food and water supplies to ensure that the new residents do not cause overcrowding in the shelter or exacerbate the food and water supply situation. Measure LE/ES-3 and LE/ES-4 would improve the safety of the residents of the Piru Expansion Area in the event of a dam failure emergency.

4.13.4 Residual Impact

Implementation of recommended measures would reduce law enforcement and emergency service impacts to less-than-significant levels. However, as noted above, it is not currently known if formation of a CSA/CSD or CFD as recommended by Measure LE/ES 1 is feasible. Therefore, the projects could cause a significant adverse, unmitigated impact to law enforcement services. If a CSA/CSD or CFD is not formed, law enforcement services within the community will remain the standard service offered by the Sheriff's Department.

Although a catastrophic dam failure is considered extremely remote, Piru School would not be adequate to provide emergency shelter for the entire Piru Community and would not be able to accommodate automobile parking for the entire community under a dam failure condition.

4.14 Education

The Ventura County *Initial Study Assessment Guidelines* define the criteria and methodology for determining whether a proposed project may have a significant adverse impact on educational facilities and services. This includes both direct impacts and increased demand on school facilities at elementary, secondary, and post-secondary levels as well as public library facilities and services. Any residential project (excluding senior housing) that would have a significant physical impact on school facilities or would substantially interfere with the operation of an existing school facility, or exacerbate overcrowded conditions at an existing school, would create a significant impact. Likewise, all residential projects that would substantially interfere with the operation of an existing public library facility or create additional demands on a public library facility that is already overcrowded would generate a significant impact.

4.14.1 Environmental Setting

K-12th Grade

Education for Piru children in grades kindergarten to 12th grade is provided by Fillmore Unified School District (FUSD).

K-5th Grade

FUSD currently operates three elementary schools, Sespe Elementary School and San Cayetano Elementary School, both located in the City of Fillmore, and Piru Elementary School, located in the Piru Community. Existing elementary schools in Fillmore are currently overcrowded. Sespe Elementary school, for example, has added 20 portable classrooms and must hold three lunch periods per day to accommodate 775 existing students. To relieve overcrowding of existing schools, FUSD is currently constructing a new school, Mountain Vista Elementary School. Mountain Vista School is expected to be completed by January 2006. A fifth school, Rio Vista Elementary School, is scheduled to be constructed as a part of the Heritage Valley Parks project, a new development planned between Highway 126 and the Santa Clara River. Rio Vista School is expected to be completed in 2007.

Despite the current size of some existing elementary schools, FUSD policy strives to provide relatively smaller elementary schools with enrollments of 500 to 600 students. Additionally, the State recommends school site acreage standards based upon student enrollments at various grade levels, but recommends that elementary schools should have a minimum size of ten acres to provide for enrollment growth.

The Piru School attendance boundary stretches from Kern County to the north, Los Angeles County to the east and west to the City limits of Fillmore. Piru Elementary School has a current enrollment of 359 students from kindergarten to fifth grade. Most of these students come from the Piru Community and the Sespe farmworker housing project located 1½ miles west of the community. FUSD indicates 156 students at Piru School live outside the school's attendance area or outside the school district. These transfer students comprise 43.5 percent of the Piru School enrollment. FUSD indicates the Piru School campus has a capacity of 432 students¹⁵.

The Piru School campus occupies a 7.88-acre site. The school has 16 classrooms with an average class size of 22.4 students per classroom. Five of the classrooms are located within permanent buildings. The remaining 11 classrooms are located in portable facilities. Four additional portable

¹⁵ Determining the capacity of a school is complex, and several methodologies are available. The methodology used for this EIR is the District Method. The District Method is based upon FUSD generated guidelines which take into account District goals, policies, bargaining agreements, local program considerations and government regulations. Another methodology that is used to measure school capacity is the State Funding Application Method. One of the differences is that the State Funding Application Method does not count portable classrooms in excess of 25% of the number of permanent classroom. Since Piru School has a large number of portable classrooms, using this methodology, Piru School would have a capacity of only 200 students.

facilities are currently devoted to computer labs, an art resource center and after school day care. Piru School also houses a joint library operated by FUSD and the Ventura County Library.

The Piru School campus includes a mix of older buildings and portable classrooms, some of which are currently in urgent need of replacement. Because of the poor placement of the existing portables, the school cannot be readily expanded without a major redesign of the campus.

Some Piru residents have expressed concerns related to before and after school traffic congestion at Piru School due to student pick-up and drop-offs and due to poor bus circulation at the school. This issue is discussed in the Transportation and Circulation chapter.

Middle School

Fillmore Middle School currently has a student population of 960. FUSD indicates the school has a capacity of 1,034. A bond measure approved in November 2004 will provide funds for construction of up to 16 additional classrooms, increasing the student capacity to 1,482. FUSD has not yet set a timetable for completion of the planned improvements at Fillmore Middle School.

High School

Fillmore High School has a student population of 1,133. Recent construction of 24 new classrooms has increased the student capacity to 1,474 students.

College

The Ventura County Community College District (VCCCD) provides public community college education. The District serves approximately 31,000 students per year. The nearest VCCD campus to Piru is Moorpark Community College, located in Moorpark (21.6 miles driving distance). The student population at Moorpark College is currently 13,576. In addition, a VCCCD satellite-learning center is located in Santa Paula (18.3 miles) and selected VCCCD courses are offered to students online. Students in Piru also have the option of attending classes at College of the Canyons, in Santa Clarita (16.1 miles). College of the Canyons has a student population of 15,053 and is operated by Santa Clarita Community College District (SCCCD).

The California State University system operates California State University Channel Islands (CSUCI) south of Camarillo (32.4 miles) and California State University, Northridge (CSUN) in San Fernando Valley (33.7 miles). CSUCI has a student population of 2,021 while CSUN has a population of 31,341 students. The CSU system currently serves 408,946 students statewide (317,234 full time equivalent students).

Library Services

Library services in Piru are provided by the Ventura County Library at Piru Elementary School. The building occupies 1,960 square feet and the Piru Library collection holds approximately 24,400 volumes. About 30 percent of these books belong to FUSD. The library is only open 24 hours per week.

4.14.2 Impact Analysis

Impacts to Schools Serving Students from Kindergarten to 12th Grade

The proposed project is estimated to generate additional students in accordance with FUSD student generation factors as follows:

PROJECT AND CUMULATIVE STUDENT GENERATION ¹⁶						
GRADE BREAKDOWN	STUDENT GENERATION FACTOR (per dwelling unit)	PROJECT PROPOSED DWELLING UNITS	ESTIMATED CUMULATIVE DWELLING UNITS (from buildout of the existing community)	ESTIMATED STUDENTS GENERATED BY EACH PROJECT COMPONENT	TOTAL ESTIMATED STUDENTS GENERATED BY PROJECT	TOTAL ESTIMATED STUDENTS GENERATED BY CUMULATIVE DEVELOPMENT
Elementary (K to 5 th grade)	0.5374	Rieder – 60 Levy – 104 Finch - 185 County - 45	283	Rieder – 32, Levy -56, Finch-99, County – 24	212	<u>256</u> 152
Middle School (6 th to 8 th grade)	0.1862			Rieder –11, Levy -19, Finch-34, County – 8	73	<u>89</u> 53
High School (9 th to 12 th grade)	0.1241			Rieder – 7, Levy -13, Finch-23, County – 6	49	<u>59</u> 35

K-5th Grade

According to FUSD, Piru Elementary School can accommodate an additional 70 students. Principal Carol Barringer indicates that the addition of 70 students without additional construction would probably result in the elimination of the art resource center and relocation of the after school day care program. Additionally, all classrooms would be at their maximum capacity.

As the project is estimated to generate 212 elementary students and cumulative development of vacant land within the existing community is estimated to generate 256 452 additional elementary students for a combined total of 468 364 students, impacts on Piru Elementary School are deemed to be both project and cumulatively significant.

Project and cumulative development would far exceed the FUSD's recommended maximum elementary school population of 500 students. To accommodate a full buildout Piru School population of 827 723 students, it would be necessary to add at least 15 44 classrooms (and up to 18 46 classrooms if the current average class size of 22.4 students is maintained). These impacts are exacerbated because Piru School is only 7.88 acres in area, which is less than the recommended 10-acre standard and because portable units to address previous community growth have been located poorly so that any additional portable classroom units would likely result in the loss of essential playfield space.

Middle School

According to FUSD, Fillmore Middle School can currently accommodate 74 additional students. Excess capacity at Fillmore Middle School will increase to 522 students once construction of planned classroom space is completed. Project development would generate an estimated 73 middle school students. Thus project development will not exceed capacity at the middle school level, particularly once construction of the planned expansion is completed. Cumulative development in Piru and Fillmore could not be accommodated without the planned middle school expansion. However, once the new classrooms are completed, project and cumulative Piru development together would generate 162 426 middle school students, or about 31 24 percent of the available capacity of Fillmore Middle School. Thus, impacts to Fillmore Middle School would be less than significant.

¹⁶ FUSD revises its student generation rates annually. FUSD provided the County with student generation rates from 2003 and 2004. The 2004 rates are substantially lower than student rates previously used by the District (43% lower than the 2003 rate for elementary student generation). The District believes the 2004 rates are an anomaly. The rates utilized in this EIR are from 2003 and represent a more conservative analysis. The 2004 student generation rate table may be found in Appendix 8.9.

High School

Fillmore High School has space for 341 additional students. The proposed project and cumulative Piru development would generate 108 84 high school students or about 32 25 percent of the available capacity. Therefore, impacts to Fillmore High School would be less than significant.

Impacts to Colleges

Based upon Ventura County community college student ratio of 0.1232 students per dwelling unit, project and cumulative development in Piru is expected to generate 107 83 additional community college students per year at full buildout. VCCCD and SCCCDC both indicate that their facilities can absorb these additional students without difficulty. Therefore, impacts on community colleges are considered less than significant.

Based upon CSU student ratio of 0.0275 students per dwelling unit, project and cumulative development in Piru is expected to generate 24 49 additional CSU students per year. While some CSU schools are considered to be impacted, neither CSUCI nor CSUN are in this category. Therefore, impacts on CSU schools are less than significant.

Impacts to Library Services

The American Library Association (ALA) provides guidelines for small community public libraries. These guidelines recommend that small community libraries should have a size of at least 0.7 square feet per capita with a minimum of 2,000 square feet of floor area. The small library should provide 3-5 volumes per capita with a minimum collection of 6,000 books.

The Piru Library is 1,960 square feet (1.15 square feet of library space per capita based upon an estimated Piru Community population of 1,703). Thus the existing facility is generally in compliance with ALA guidelines, although the library building has slightly less floor space than that recommended by the ALA. With buildout of the project, the per capita square footage of library space drops to 0.62 square feet per capita. With cumulative development, the square footage drops further to 0.4 0.45 square feet per capita. These levels are below the recommended standard for a rural community such as Piru. To comply with the recommended library size, the Piru Library should be increased to 4,492 3,049 square feet.

The Piru Library collection holds approximately 24,400 volumes or about 14.3 books per capita. Approximately 30% of the books are owned by the FUSD. Project buildout would reduce this to 7.8 books per capita. Cumulative development would further reduce the books per capita to 5.0 5.7. However, this still exceeds the ALA guideline of 3-5 volumes per capita.

The Piru Library is only open 24 hours per week, which the Ventura County Library considers less than adequate. The County Library recommends 40 hours per week for a rural library of this type. Staff is currently shared between the FUSD and the Ventura County Library.

The Ventura County Library indicates that the Piru Library operates in a deficit mode, that is, property taxes generated within the Piru Service Area are insufficient to pay for the existing level of service. The Library service area generates approximately \$41,000 in revenue each year while the Library District's cost of operating this library is \$56,000. The balance is currently covered by Library District tax revenues collected from other portions of the unincorporated County area. While expansion of the Piru Community would be expected to add tax revenues, it would also increase the number of library users. Thus, new revenues would largely be offset by increased demand for service.

The Ventura County Library concludes that project and cumulative development will degrade library service to the community. While the book collection is adequate in terms of numbers, the collection will require enhancement if it is to remain up-to-date, and the hours of library operation and size of the library facility will be at less than adequate levels. Therefore impacts to library services will be significant.

General Plan Policies

The General Plan education goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs.

The *Piru Area Plan* education goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

Policy 4.2.2-2 Applicants for privately-initiated General Plan Amendments and/or zone changes for new development which would increase the number of school-aged children shall be required to enter into a binding agreement with the Fillmore Unified School District to mitigate the projects' impact on school facilities.

This policy is in support of the following goal:

Goal 4.2.1 Minimize overcrowding in the Schools serving Piru

Current State law (SB 50, passed in 1998) precludes implementation of the above policy. However, as indicated below (Funding Options Section), the applicants would be required to pay an estimated \$ 2.9 million dollars in school district fees that would help to mitigate impacts of students generated by the project. In addition, recommended mitigation that would defer approval of the project until November 2006 (when SB 50 is projected to sunset) or until the applicant agrees to the payment of funds to the school district for a Piru School Master Plan and agrees to the formation of a Mello-Ross Community Facilities District (or other funding mechanism acceptable to the school district) to pay for any needed school facilities in excess of what would be funded by required school district fees. Therefore, with mitigation, the project will be consistent with Area Plan Policy 4.2.2-2 (to the extent allowed by State law).

4.14.3 Mitigation Measures

Elementary School Capacity Mitigation Options

Project and cumulative development would exceed the existing capacity of Piru Elementary School. State law requires school districts to provide educational services to all students within the district. State law limits the County's authority to condition developers to address school capacity issues beyond the State prescribed school fees. The conundrum is that the state established maximum school fee is inadequate to fully fund and staff the needed school facilities (See additional discussion under *Funding Options/Developer Fees*, below). It is further noted that the County has no authority to dictate how FUSD accomplishes its legal mandate to provide educational services to Piru residents. The following describes some of the options that FUSD may consider to address elementary school capacity deficiencies in Piru:

Attendance Policies:

(1) Transfer Policy Change

Piru School has a current capacity of 432 students. The existing elementary students (359), plus project-generated students (212) and cumulative-generated students (256) (~~452~~) would result in 827 723 elementary school students, causing the school to exceed its current capacity by 395 ~~294~~ students at full buildout.

As previously noted, 43.5 percent (156) of Piru School students currently live outside the attendance boundary of Piru School or outside the District. Most of these students have Fillmore addresses. If the District were to not allow out of area and out of district transfers, Piru School would be able to accommodate an enrollment increase of up to 226 students. If this policy change were fully effective, Piru School could accommodate all of the project generated students, though cumulative development would still exceed Piru School's existing maximum student capacity by 169 438 students. Nonetheless, this policy change is considered a feasible mitigation measure.

(2) Attendance Boundary Adjustments

As discussed earlier, the Piru School attendance boundary extends to the Fillmore City limits, requiring some Piru School students living on farmland near Fillmore to be bussed up to seven miles to Piru School, when San Cayetano School and the future Rio Vista School would be much closer. Once Mountain Vista and Rio Vista Schools are completed, attendance boundary adjustment will be necessary in any case. This would create an opportunity to move the Piru attendance boundary closer to Piru. Placing students closer to their home schools would save the FUSD money in bus transportation costs, would reduce travel time for students and benefit parents who could more easily participate in school activities. This change would be expected to affect only a handful of students living in the farmland between Piru and Fillmore. The exact number would vary depending on where the boundary line was placed.

The Environmental effects of the above changes would be a net improvement as air quality and transportation impacts associated with bussing students from Fillmore to Piru would be reduced, but cumulative development would still exceed Piru School's capacity.

This mitigation alternative is considered feasible, and would have an unknown but probably minor increase in capacity at Piru School.

(3) Transfer of Rancho Sespe Farmworker Housing Project Students

At least 60 Rancho Sespe Farmworker Housing Project students are currently bussed to Piru School. In order to further increase capacity at Piru School, these students could be bussed to Fillmore schools instead of Piru School. However, in this case the bus ride would be increased from 1½ miles to about four miles, would increase student travel time, would be more inconvenient for parents and would increase transportation costs.

Bussing Rancho Sespe students to Fillmore would negate some of the benefits to air quality and transportation cited above. Additionally, by transferring the Rancho Sespe students to Fillmore, Piru School would have the lowest minority percentage of all the elementary schools, which poses ethnic balance issues for the District. It is noted that, even if FUSD incorporated all of the above changes (Mitigation alternatives A1 and A2), Piru School, at full buildout of the project and cumulative development, would still be expected to exceed the existing capacity at full buildout by an estimated 172 68 to 182 78 students.

While this mitigation alternative is considered technically feasible, the negative impacts with respect to air quality, traffic, community character and increased cost to the District would argue that this measure should be implemented, if at all, only if on a temporary basis, or in the event that expansion of Piru School capacity (as described in measure B below) proves to be financially or politically infeasible.

(4) Transfer of Fifth Grade Students

If increasing the capacity at Piru School proves politically or financially infeasible (see mitigation option B, below), FUSD could address this ultimate build-out problem by transferring some students to schools in Fillmore. For example, Piru School could be converted to a K-4th grade school by transferring fifth graders to Fillmore schools. Fifth graders total 17.4% of the Piru School population or about 144 426 students at full buildout. This, in addition to the transfer policy changes and boundary adjustments described above, would allow Piru School to accommodate all project and all but 38 of cumulative development students.

FUSD indicates that transferring fifth grade students to Fillmore schools would be disruptive to efficiencies in the educational program and enrollment balance and would contribute to overcrowding in the other Fillmore schools. Transferring fifth grade students to Fillmore schools would also fully negate any potential positive impacts to air quality and transportation resulting from the elimination of transfer and out of district students.

Solving the Piru School capacity problem by bussing of fifth grade students living in Piru to schools in Fillmore would be expected to result in additional air quality and traffic impacts over the existing condition. The number of trips generated and the added emissions quantity would vary depending on

the number of students that would be transported. If transfer of excess students continued to full buildout, ~~three~~ two 65-passenger busses would be needed to transport the fifth grade students.

This measure would also make it more difficult for Piru residents to participate in elementary school activities located in Fillmore, although it is noted that middle and high school students are currently bussed from Piru to Fillmore. Additionally, splitting Piru's children into separate schools in separate towns would generally be detrimental to Piru's sense of community. If allowed to continue over time, transfer of Piru students to Fillmore schools, coupled with planned growth in the City of Fillmore, may contribute to a return to overcrowding of Fillmore elementary schools which would have the effect of transferring overcrowded conditions from Piru to Fillmore.

Piru School Expansion:

Depending upon the pace of development in Piru and Fillmore and depending upon FUSD financial circumstances, FUSD ultimately would be expected to expand elementary school facilities in Piru. This could be achieved in several ways:

(1) Piru School Expansion - Land Acquisition

Piru School is undersized (7.88 acres vs. 10 acres recommended standard). Assuming that the Transfer Policy Changes discussed previously (Section A1) would be implemented, the school's enrollment would be expanded to 567 students and FUSD would need to provide up to 6 new classrooms to house these students. Additionally, expansion of the cafeteria, parking lots and possibly administration facilities would be needed.

In order to provide additional classrooms to house more students, the existing school could be expanded by purchase of additional acreage, most likely from the relatively flat Lavern Nursery owned lands located north or west of the existing school property. Pursuant to state recommended acreage standards, the Piru School site at full buildout would need to be expanded by at least 3.22 acres of additional land for a total of 11.1 acres.¹⁷ The additional land acquisition could accommodate needed classroom facilities, additional parking and/or additional playfields. One acre of land, depending on configuration, can accommodate up to 12 portable units, 100 parking spaces, or one AYSO soccer field.

This mitigation alternative would result in several environmental impacts. The loss of 3.22 acres of prime agricultural land would be considered a significant impact on agricultural resources. Additionally, expanding the existing school would continue to expose students to land use conflicts associated with agricultural operations (noise, odors, dust and pesticide over-drift). The feasibility of this mitigation alternative would be dependent upon the willingness of the adjacent land owner to sell land to the District.

(2) Piru School Expansion – Two-Story Construction

If additional property acquisition is not possible, the District could choose to replace some of the existing one-story portable classrooms with two-story classroom buildings. Two-story construction is more expensive than one-story construction because of higher structural costs and expenses associated with providing handicapped access requirements. Nonetheless, the District would need to assess the relative costs and availability of land vs. higher construction costs to determine whether land acquisition or two-story construction (or some combination) would be financially superior or otherwise preferable to the District.

While this alternative would not require loss of prime agricultural land, existing land use conflicts associated with agricultural operations would continue and may be exacerbated by increasing the number of students that could be exposed to noise, odors, dust and pesticide over-drift.

Additionally, a compact two-story school design is more consistent with high land value inner city areas than rural Piru, therefore, this option may be perceived as having significant community

¹⁷ State site acreage standards for Piru School were applied assuming that the ratio of students enrolled in each grade will remain unchanged as school enrollment increases. Total school site acreage recommended at buildout of project and cumulative development is calculated as follows: 2.0 acres (88 kindergarten students = 4 classrooms x 0.5 acres), + 3.2 acres (278 1st-3rd grade students) + 5.9 acres (201 4th-5th grade students) = 11.1 acres recommended

character impacts. While this mitigation alternative would be physically feasible, this alternative would not satisfy the State-recommended acreage standard for elementary schools.

(3) Construction of a Second School

Cumulative development as discussed above assumes development of a 146 dwelling unit Rancho Temescal project. The Rancho Temescal project proposes development of a 12 acre school site within the Rancho Temescal property. The proposed school site is about 1¼ mile northeast of the existing Piru Community. A second school site would adequately accommodate elementary students for all project and cumulative development in the Piru area (assuming adequate funds were available for site acquisition and school construction). If Rancho Temescal is not developed, FUSD could accommodate project and cumulative development by a combination of modifying transfer policies, attendance boundary adjustments, and/or by expanding the existing school as discussed above. However, if the Rancho Temescal project is included in the cumulative analysis development of a second school would be necessary to accommodate all project and cumulative development. It is noted that the school site currently proposed by the owner of Rancho Temescal is within the Piru Lake dam inundation area and may not be suitable for a school site. An alternative school site is possible outside the dam inundation area within the Rancho Temescal property or north or west of the existing Piru School site. A new school could be either an elementary school or a middle school/elementary combination school. The latter option could have benefits related to reduced bussing of middle school students. Currently Piru Middle School students are bussed to Fillmore Middle School in the City of Fillmore.

Funding Options:

However FUSD chooses to address the insufficiency of elementary school facilities, the major difficulty will be funding any needed improvements. The financing of new permanent school facilities requires a great deal of creative financing, particularly for districts serving lower income communities.

(1) Developer Fees

Prior to 1998, the *Mira*, *Hart*, and *Murrieta* court cases provided school districts and local planning agencies the legal authority under the California Environmental Quality Act ("CEQA") to require new development to fully mitigate school impacts in connection with legislative approvals. In 1998, the legislature passed SB 50 and the voters approved Proposition 1A. SB 50 suspends *Mira/Hart/Murrieta* for 8 years (until November 2006) and provides a state imposed maximum developer fee. To backfill lost revenues, Proposition 1A provided 9.2 billion for school construction and modernization funds.

SB 50 provides three levels of statutory fees that may be levied by the school district. FUSD qualifies for all three levels. Current FUSD fees are \$4.28 per square foot for residential development and \$0.36 for commercial and industrial development. Based upon average dwelling unit size of 1,704 square foot over the past five years (FUSD data) the proposed project should generate an estimated \$2.9 million ($394 \times 1,704 \times \$4.28 + 2,474 \times \$0.36$). Cumulative development (without Rancho Temescal) is estimated to generate \$2.1 million ($283 \times 1,704 \times \$4.28 + 124,000 \times \$0.36$) for a total of about \$5 million dollars in developer fees. If Rancho Temescal is developed with larger estate lots it is estimated that an additional \$2.2 million in school developer fees may be collected.

FUSD estimates the construction, site acquisition and site development costs for students generated by new housing development at \$23,430 per pupil. Based upon these rough estimates, cost of providing educational facilities for the project-generated students would be estimated at about \$7.8 million dollars. Therefore, development fees, even at their current maximum level, may not be sufficient to address school capacity deficiencies, particularly if the Rancho Temescal project is not developed.

(2) General Obligation Bond

School districts may sell general obligation (GO) bonds if authorized by the electorate. In the past, a two-thirds majority was required for approval, but since Proposition 39 was approved in November 2002, only 55% of voters are needed to approve a GO bond for school facilities. The success ratio of bond elections has dramatically improved from 35% to 85% statewide since Proposition 39 was approved.

GO bonds are used to pay for capital improvement projects, including planning, new construction, major renovations, additions and improvements. Use of GO bonds allows the cost of public facilities to be spread out over a long period of time, but requires payment of interest to bond investors.

FUSD placed a \$10 million dollar GO bond on the November 2004 ballot which was approved by voters. This bond provided the funds to complete Mountain Vista School. Two previous bond elections in 2000 failed. Based upon surveys conducted prior to the most recent bond election, it will be difficult to gain voter approval for a GO bond needed to mitigate new residential construction. This is particularly true given that Fillmore voters outnumber Piru voters by a factor of at least nine to one, and Fillmore voters are less likely to believe they will benefit from a bond that they perceive will solely benefit Piru.

(3) Parcel Tax

School districts are authorized to levy a special tax (parcel tax) on properties in addition to property taxes levied by the state (Government Code 50079). A two-thirds majority of voters must approve a parcel tax assessment. Between 1983 and 2003, 51 percent of parcel tax elections were approved by voters in California. Unlike GO bonds, which can only be used for construction of facilities, parcel tax revenue can be used for teachers, supplies and curriculum to improve the educational program. FUSD has no plans for a parcel tax election at this time.

(4) Mello-Roos Community Facilities Act

The Mello-Roos Community Facilities Act (Civil Code §1102.6 and Government Code § 53311 and § 533420.2) authorizes local governments (cities, counties, school districts, etc.) to create Community Facility Districts (CFDs) for the purpose of selling tax exempt bonds to fund public improvements for such things as streets, police protection, fire protection, elementary schools, parks, libraries, museums and cultural facilities. Property owners that participate in a CFD pay a special tax to repay the bonds. A requisite for the Mello-Roos district's establishment is that it be approved by a two-thirds margin of voters in the district. If there are fewer than twelve registered voters within the proposed district, the vote may be passed by current landowners.

Creation of such a district would allow the School District to sell bonds for construction costs of any improvements to Piru School and/or a second school if determined necessary by FUSD. Future homeowners would pay a monthly or annual fee to pay back the bond. The City of Fillmore and Griffith Enterprises anticipate formation of a Mello-Roos CFD to fund the construction of Rio Vista Elementary School needed for the Heritage Valley Park project in the City of Fillmore.

One advantage of a CFD is that this mechanism could finance other public improvements in addition to school facilities; a CFD could fund construction of park improvements, Main Street enhancements, Expansion of the Piru Library and/or expansion of the Piru Cemetery. However, a CFD cannot fund on-going maintenance and operating costs and the CFD dissolves once the bond is paid off.

The County has historically opposed Mello-Roos Districts to fund its improvements because the County's name is on the bonds (even though the County is not directly liable, its overall credit rating can be affected), and the Mello-Roos special tax lien on each affected parcel is often overlooked by home purchasers and represents a continuing monthly or annual tax obligation in addition to the sale/purchase price.

It is noted that the FUSD can enter into a Mello-Roos CFD without the County's participation, though; in this case, the CFD would be limited to only school facilities. Moreover, a FUSD Mello-Roos CFD would compete with the need to create and fund a Community Services District in Piru for the improvement, maintenance and operation of local parks, landscaping, bike paths, street lighting/maintenance, library etc.

(5) Redevelopment

Piru School is located within the boundaries of the Piru Redevelopment Agency (RDA). Redevelopment tax increment funds generated by the district can be used to help alleviate school overcrowding or provide public improvements at the School. The RDA has agreed to fund \$60,000 toward the cost of addressing the before and after school traffic circulation problems associated with

Piru School. The FUSD estimates the total cost at \$250,000. The RDA is also funding the improvement of sidewalks within the community to help provide a safer walking environment within the community which is of direct benefit to students walking to Piru School. The proposed Piru Expansion Area is generally outside the boundaries of the RDA (except for the John Rieder property). Therefore the development of the Piru Expansion Area will not generate substantial tax increment funds for the RDA.

Recommended Mitigation Measure - Elementary School Capacity

The following measure is recommended to address elementary school capacity impacts:

- E-1** Prior to recordation of any tract map within the Piru Expansion Area, The effective date of project approval shall be deferred until ~~November 2006~~, or until the following occurs: the applicants shall enter into an agreement to provide sufficient funds to Fillmore Unified School District (FUSD) to develop a Piru School master plan, that would address how the FUSD would provide educational services based on the number of dwelling units approved by the County, along with an estimate of construction and land acquisition costs, and If the cost of such improvements is determined to be in excess of required FUSD development fees the applicants shall enter into an agreement with the School District to form a Mello-Roos Community Facilities District (CFD) or other mechanism acceptable to FUSD to finance construction of needed school improvements in Piru if the cost is determined to be in excess of required FUSD development fees

Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the estimated number of elementary students generated by each project component. (Component A: 32 = 15.21%, Component B: 56 = 26.36%, Component C: 99 = 46.90%, and Component D: 24 = 11.53%).

In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with preparation of the Piru School Master Plan and shall agree to pay all costs associated with the creation of a CFD with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps. Upon application for a permit adjustment, this measure may be modified by the County in the event the FUSD fails to complete the required Piru School master plan within a timely matter (within 120 days of submission of required funds) or if the developer believes the cost of improvements are not justified.

FUSD estimates that the cost of a master plan study would be \$25,000. The FUSD is required to provide educational services to Piru residents and thus must make decisions regarding school options in response to land use decision made by Ventura County in Piru. In the past, the FUSD has simply placed portable classroom units on the school campus on an as needed basis. There is no longer any available land on the site to place additional classroom units. The result of ad hoc planning has been inefficient placement, poor parking and circulation and no provision for expansion of cafeteria or administrative space. A number of school facility enhancement options are described above. FUSD cannot determine which alternative makes the most sense until the County makes a final decision concerning how many dwelling units will be allowed in the proposed expansion area.

FUSD currently levies the maximum developer fee allowed by law. Nonetheless, the amount may not be sufficient to fund the improvements required for Piru School. State law precludes the County from requiring mitigation in excess of the development fee limits set by SB 50. State law does not allow the County to deny the project or reduce project size solely due to inadequate school capacity, but state law does not preclude the County from deferring final approval until after the provisions of SB 50 have expired. After November 2006, recommendations 1a and 1b, above, can and should be imposed as tract map conditions.

Nonetheless, the Board of Supervisors is only bound by the existing provisions of State law and may find that the above mitigation measure is not legally feasible and still approve the project with over-riding considerations.

Recommended Mitigation Measures - Library Services

The following measure is recommended to address potential library service impacts:

- E-2** Prior to recordation of any tract map within the proposed Piru Expansion Area, the developer shall deposit a fee of \$216 per dwelling unit to cover the cost of library expansion.
- E-3** Prior to recordation of any tract map in the Piru Expansion Area a County Service Area (CSA) or Community Services District (CSD) shall be formed to provide additional tax support for the Piru Library to cover developers shall coordinate with the Piru Neighborhood Council, the Local Agency Formation Commission (LAFCO) and the Ventura County Library to determine the most appropriate mechanism to fund the cost of increasing library hours of operation to 40 hours per week and to fund maintenance of the book collection. If the Piru Community desires formation of a communitywide special district (e.g., a County Service Area or Community Services District) developers shall pay the cost of formation of such a district. Alternatively, the developers may elect to form a Community Facilities District (CFD) with authorization from the Board of Supervisors.

Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. (Component A: 60 = 15.23%, Component B: 104 = 26.40%, Component C: 185 = 46.95%, and Component D: 45 = 11.42%).

In the event developers wish to proceed independently of each other, the first developer to record his tract map shall pay all costs associated with creation of a district with subsequent developers responsible for reimbursement of excess costs prior to recordation of subsequent tract maps.

The Ventura County Library indicates that a modest \$2.00 per capita will allow the Piru Library to adequately maintain the existing book collection. However, additional funds would be necessary to expand the size of the size of the Piru Library Adding an additional 1,000 square feet of library space is estimated to cost \$85,000 at \$85 per square foot (or about \$216 per proposed dwelling unit). Additionally, to increase the hours of operation from 24 to 40 hours per week is estimated to cost \$44,000 per year (or about \$442 \$49 per dwelling unit per year), assuming the existing Piru Community would support an increased tax for expanded library services. Note that the actual amount required by the library to increase hours of operation may be reduced by the amount of property tax paid to the Ventura County Library District by the new residential development within the Piru Expansion Area.

Formation of a CSA/CSD would require approval by LAFCO based upon its determination of financial feasibility and compliance with LAFCO policies and will require approval by Piru voters. LAFCO staff indicate that a CSA or CSD is legally precluded from providing services planned to benefit an area outside the proposed district. Therefore if a CSA or CSD is formed for this purpose it would have to be a communitywide district. It is unknown whether the Piru Community would support taxing themselves to increase library services. It is also unknown whether LAFCO would approve such a district based upon its determination of financial feasibility and compliance with LAFCO policies. It is noted that formation of a CFD for the Piru Expansion Area could fund enhanced library services for the community. However, the County has historically opposed the use of CFDs if other mechanisms are available and there is no overriding public benefit. This is because the County's name is on the bonds and, although the County is not directly liable in the case of default, the County's overall bond credit rating can be adversely affected in such cases. Therefore, the political and financial feasibility of forming a CSA/CSD or CFD special district this measure cannot be determined.

4.14.4 Residual Impacts

With implementation of the above mitigation measures, impacts to elementary school capacity and library services would be reduced to less than significant levels. However, expansion of Piru School would have potentially significant impacts with respect to loss of agricultural resources, as the only topographically unconstrained land available for expansion is designated as "Agriculture" by the

County General Plan, is within the Fillmore-Piru Greenbelt and has been identified as "Prime" farmland under the California Department of Conservation Farmland Mapping and Monitoring Program, *Important Farmlands Maps*.

Additionally, it is noted that in the event that the requirements of SB 50 are extended by the state legislature, the above elementary school capacity mitigation could not be legally mandated. Thus, if the State elects to extend SB 50, compliance with Area Plan Policy 4.2.2-2 would be inconsistent with State law. In order to avoid this inconsistency, it would be necessary to rescind Policy 4.2.2-2.

It is noted that if a CSA/CSD or CFD is not formed the community library hours of operation is expected to remain unchanged.

4.15 Recreation

The term Recreational Facilities includes facilities and services related to providing recreation on a countywide basis for the citizens of Ventura County. It includes the following terms:

Local Parks/Facilities - A local park/facility serves the daily needs of a defined neighborhood or group of neighborhoods within an unincorporated urbanized area of the county. Local park acreage should provide for three primary types of recreation: open areas for passive recreation and relaxation; active sports areas for sports fields and court games; and neighborhood or community centers which accommodate a wide variety of community serving activities catering to all age groups. Local parks are divided into three major classes -- *neighborhood park, community park facilities and playfields, and local trails/corridors.*

Regional Park/Facilities - A regional park/facility is an extent of land that, by its unique, natural character or unusual or extensive development, offers recreation opportunities that attract patronage from beyond the local vicinity without regard to physical, political, or municipal boundaries. There is no defined service radius. Regional park/facilities are divided into four major classes: *regional park, recreation park preserve, regional open space and specialized facility.*

Regional Trails/Corridors - Regional trails/corridors include facilities that are intended to accommodate non-motorized recreational travel. Regional trails/corridors are intended to link major park and recreation facilities. They may be designated as single purpose and/or multi-purpose by design (e.g., pedestrian, bicycle, equestrian) and major access points are served by a trailhead.

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

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

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

4.15.1 Environmental Setting

Local Parks

The County of Ventura provides local recreation services through the General Services Agency, Parks Department.

The Parks Department owns and operates Warring Park within the Piru Community. Warring Park provide a baseball field, picnic areas and a community center. Warring Park is 3.9 acres in size.

Piru Town Square, dedicated January 2002, consists of the Piru Train Depot, a bandstand pavilion and a small picnic area provides an additional 1.2 acres suitable for public gatherings and community events. Piru Town Square is owned by the Ventura County Transportation Commission (VCTC) and currently operated and maintained by the Piru Redevelopment Agency (RDA). As the RDA is not set up to provide long-term facility operation and maintenance, another agency and a permanent funding mechanism will be needed to administer and fund on-going maintenance and operation of Piru Town Square.

An existing multi-purpose path connects Warring Park to Main Street via the Railroad right-of-way, adding 0.4 acres for a total of 5.5 acres of local park and recreation land.

Piru has an estimated population of 1,703 (Planning Division, June 2004 estimate). Based upon the Parks Department's standard of 5 acres of parkland per 1,000 population, the Piru Community should have 8.5 acres of parkland. Additionally, the Rancho Sespe farmworker housing project, located 1.5

miles west of the Piru Community, shares Piru's local park facilities. Rancho Sespe has a population of 551 (2000 US Census). With the Rancho Sespe housing added to the Piru Community population, the community would require 11.3 acres of local parkland, resulting in a parkland deficit of 5.8 acres.

Regional Parks/Facilities

The County Parks Department owns 24 regional parks, three golf courses and two regional trails. The nearest County regional parks are Kenny Grove Park and Toland Park, located between Fillmore and Santa Paula, 10 and 13 miles driving distance from Piru respectively. Toland Park is currently undeveloped and Kenny Grove is operated by a private concessionaire, and offers camping, picnicking, an amphitheater and RV facilities.

The Lake Piru Recreation Area is owned and operated by United Water Conservation District (UWCD) and includes 2,200 acres at Lake Piru. The recreation area features picnicking, RV camping, horseback riding and fishing and boating activities. The Lake Piru Recreation Area is located six miles north of Piru and serves an estimated 800,000 visitors per year. The only access to Lake Piru is through the Piru Community. UWCD is currently processing an application to expand its recreational facilities at the Lake. Planned improvements include: a refurbished campground area (adding 64 additional RV campsites); expanded day use facilities (including new and refurbished picnic areas, a children's play area, a swimming pond and enhanced swimming beach); and new support facilities (including a new 3,500 square foot camp store, registration office, interpretive displays, a 1,250 square foot addition to an existing restaurant, construction of a new 8,000 square foot recreation clubhouse building, relocation of staff residences, replacement of an existing maintenance building, relocation of a boat storage area, addition of a new marina parking lot for at least 40 cars/trailer, and various landscape, trail and infrastructure enhancements). The UWCD application proposed to add tram service from Lake Piru to the town of Piru, Rancho Camulos and Blue Point campground.

Piru Motocross Park is a privately owned recreational facility for dirt bikers, located on 30 acres at 4375 Center Street (just east of the Piru Community).

Los Padres National Forest is located north of Lake Piru and provides 860 square miles of recreation land within Ventura County. As part of the Forest Service's multiple use management strategy various recreation facilities are provided, including hiking, equestrian and off-road vehicle trails and camping areas accessible by road and trail.

Regional Trails/Corridors

The County Board of Supervisors "conceptually" approved the *Regional Trails and Pathways Plan* in 1994. According to the Regional Trails & Pathways Master Plan, a Class 1 bike pathway is under consideration for the former Southern Pacific railroad right-of-way which extends from Ventura to the County line, through the community of Piru. This right-of-way is currently owned by the Ventura County Transportation Commission. A 0.5-mile portion of this planned pathway has been constructed between Warring Park and Main Street in Piru. The County CEO's office has received grants to extend this pathway and train tracks from the Piru Community to Rancho Camulos about 2.5 miles east of the community. Phase 1 will go out to bid August of 2005 and the trail portion of the project should be completed by 2007. Additionally, Los Padres National Forest attempts to maintain 10.2 miles of hiking trails within the Piru Area of Interest. However, LPNF staff indicate that the Forest Service has insufficient funds to properly maintain the existing network of trails. A portion of the Potholes trail has been recently cleared and restored by the Youth Conservation Corps. However, the Aqua Blanca Trail is mostly impassable due to storms and lack of maintenance. No funds are currently available for restoration of this trail.

Based upon Piru's existing population of 1,703 and the Parks Department's adopted standard of 2.5 miles of trail per 1,000 population, the Piru Community should have 4.3 miles of trail within the community. Once the trail to Rancho Camulos is complete, the community would have about 3 miles of bicycle trail, but would still have a trail deficit of about 1.3 miles. If the Los Padres National Forest trails were properly maintained, the community would have a surplus of 8.9 miles of regional trail.

4.15.2 Impacts

Impacts on Local Parks

As population increases, demand for local park facilities also increases. The proposed project is estimated to generate more population and therefore additional local park demand as described in the following:

Figure 4.15-1 Project and Cumulative Local Park Demand

COMPONENT	POPULATION (Generated at 3.66 persons per dwelling unit per 2000 Census)	PARKLAND ACREAGE NEEDED (At 5 acres per 1,000 population)
1. John Rieder (60 DUs)	220	1.1 ac.
2. Dana Levy (104 DUs)	381	1.9 ac.
3. James Finch (185 DUs)	677	3.4 ac.
4. County of Ventura (45 DUs)	165	0.8 ac.
TOTAL PARK ACREAGE NEEDED FOR THE PROPOSED PROJECT	1,443	7.2 ac.
Future Cumulative Development (480 283 DUs)	<u>1,757</u> 4,466	<u>8.8</u> 5.8 ac.
PROJECT PLUS CUMULATIVE PARK ACREAGE NEEDED	<u>3,200</u> 3,049	<u>16.0</u> 43 ac.
<u>Existing Piru Community Local Parkland Deficiency</u>	<u>1,703</u>	<u>8.5 ac.</u>
<u>Total Parkland Need for Existing Community, Cumulative Development and Proposed Project</u>	<u>4,903</u>	<u>24.5 ac.</u>

As described in the above table, the proposed project would generate a need for 7.2 acres of additional local parkland, while cumulative development of the Piru Community would ultimately require an additional 8.8 5.8 acres of local parkland for a total of 16 43 acres of parkland needed for project and cumulative development. (This does not take into consideration the existing 8.5-acre local park deficiency.) This impact is deemed both project and cumulatively significant.

The Piru Parks Commission has indicated that the community desires additional parkland to provide youth soccer fields and an adult softball field.

A proposed policy of the Piru Area Plan Update would require that a new park site be identified and full funding for land acquisition, construction and long-term maintenance be assured prior to recordation of any new subdivisions in the proposed Piru Expansion Area.

The County Parks Department estimates the cost of developing a local park is approximately \$16,000 per acre for development of a turf area. This includes planning, grading, utilities, landscaping and irrigation but does not include the cost of land acquisition or development of park facilities and improvements, other than a turf field.

Local park development may be funded by a variety of sources. Developers of very large subdivisions generally donate the land and construct local parks to County standards as a turnkey operation. In the absence of a larger subdivision, developer fees (Quimby) are collected by the County. Quimby fees may be combined with grants to fund parkland acquisition and construction. It is noted that the County Quimby Ordinance has not been revised since the 1970's and does not provide sufficient funds to provide local parks that meet Parks Department standards and provides no funds for maintenance and operations. Maintenance and operation costs are generally covered by the County General Fund, which in recent years has been insufficient to meet all of the operating costs of existing parks and community centers.

Quimby fees from the proposed project are expected to generate approximately \$686,000 (see Appendix 8.10). The cost of developing a 7.2-acre park is estimated at \$115,200 plus at least \$691,200 (\$96,000 per acre) for site acquisition.

Cost of operation and maintenance of a park of 7.2 acres in area is estimated at \$25,000 per year. The Board of Supervisors currently budgets \$200,000 per year for maintenance and operation of the 5 existing local parks and community centers. Given the constraints on General Fund revenues, it is unlikely that the Board of Supervisors would authorize additional funds for maintenance and operation of a new local park in Piru. The Parks Department has indicated it will not support development of a new park without assured operational funding.

The John Rieder project would provide three small (5-6,000 square foot) landscaped open space areas totaling about 0.4 acre within the proposed apartment complex. These areas would provide the dual purpose of providing stormwater detention and a visual amenity for apartment residents. The Dana Levy application describes a 61,194 square foot detention basin and a 10,683 square foot landscaped lot adjacent to Highway 126, totaling 1.7 acres of open space that would be designed to provide stormwater detention and could be landscaped as a visual amenity. Neither of these project amenities would count as local parkland for purposes of the Quimby Ordinance. However, the James Finch project application indicates a proposed park. The application does not indicate the size or location or whether the park would be public or private. Thus, it is not currently known whether, or to what extent this park might address local parkland deficiency in the Piru Community.

Impacts on Regional Parks/Facilities

The projected population of the proposed project and the projected population of all cumulative development would warrant 13 acres of regional parkland in accordance with County Parks Department standards (5 acres per 1,000 population). Although there are no County owned/operated regional parks within the Piru Area of interest, the community has access to the Lake Piru Recreation Area, the Los Padres National Forest and Piru Motocross Park. These public and private recreation facilities effectively provide thousands of acres of regional park and recreation facilities for the residents of Piru and the proposed expansion area. Therefore, impacts on regional parks/facilities are considered less than significant.

Impacts on Regional Trails/Corridors

In accordance with the County Parks Department recommended trail standard (2.5 miles of trail per 1,000 population) the proposed project would require 3.6 miles of trail. The cumulative development would require an additional 2.9 miles of trail, totaling 6.5 miles of trail needed at buildout to meet the County Parks Department standard. This trail deficiency would be in addition to 1.3-mile Piru Community trail deficit described in the setting section above. If properly maintained, the Los Padres National Forest hiking trails within the Piru Area of Interest would provide a net surplus of 2.4 miles of regional trail. However, as these trails are largely unmaintained and impassable at this time, Therefore, project and cumulative impacts associated with regional trails would be significant.

Proposed policies of the Piru Area Plan would require construction of a multi-purpose pathway along both sides of Main Street between Highway 126 and the railroad right-of way. This would provide about one mile of pedestrian/bicycle pathway but would not be sufficient to meet the Parks Department trail standard for the proposed expansion area.

General Plan Policies

The General Plan recreation goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant goals, policies and programs, with the exception of the following:

Policy 4.10.2-1 The County shall maintain and enforce the local parkland dedication requirements (Quimby Ordinance), to acquire and develop neighborhood and community recreation facilities. Parkland dedication shall be based on a

standard of five acres of local parkland per thousand population, including neighborhood and community parks.

This policy is in support of the following goals:

- Goal 4.10.1-1 *Acquire, develop and operate a system of recreation facilities to meet the recreation needs of County residents.*
- Goal 4.10.1-2 *Pursue an equitable, independent, and reliable method of financing the planning, acquisition, development, operation and maintenance of recreation facilities.*
- Goal 4.10.1-5 *Establish or assist in the establishment of a Countywide network of trails which will meet the needs of equestrians, bicyclists, hikers and other trail user groups*

The proposed project will exacerbate the existing parkland and trail deficiency in the Piru Community. The Recreation chapter recommends mitigation that would require the applicants to acquire, develop and fund the cost of maintenance for a new community sports park and require the construction of additional bicycle trails. Therefore, with mitigation as recommended, the proposed project would not be inconsistent with policy 4.10.2-1 and attendant goals 4.10.1-1, 4.10.1-2, and 4.10.1-5.

The *Piru Area Plan* recreation goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent all of the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

- Policy 4.7.2-2 *Planned Residential Development projects shall be conditioned to provide private recreation area within the development.*
- Policy 4.7.2-3 *Subdivisions shall be conditioned to provide land and improvements for park and recreation facilities or shall pay in lieu, fees to help finance needed park and recreation facilities. ...*

These policies are in support of the following goal:

- Goal 4.7.1-3 *Encourage new residential developments to provide recreational facilities for the population expected to be generated.*

The proposed project will exacerbate the existing parkland deficit in the Piru Community. The Recreation chapter recommends mitigation that would require the applicants to acquire, develop and fund the cost of maintenance for a new community sports park. Therefore, with mitigation as recommended, the proposed project would not be inconsistent with Area Plan policy 4.7.2-3.

None of the applicants are specifically proposing private recreation areas. However, the Finch project includes a park, which could be public or private. The Rieder project includes several small landscaped areas (totaling about 0.4 acre) which are intended to provide stormwater detention. These parcels would be landscaped and would presumably be available for passive recreation purposes. The Levy project contains a small landscaped lot and a detention basin. The landscape parcel and possibly a portion of the detention basin could be used for private recreation. Proposed mitigation recommended in this chapter would require all of the applicants to make provision for public and private recreation areas. Therefore, as mitigated, the project would be consistent with policy 4.7.2-2.

4.15.3 Mitigation Measures

Mitigation of Local Parkland Deficiency

The proposed project will generate a need for 7.2 acres of additional usable public parkland. To address this need and to comply with proposed Piru Area Plan policy 4.7.2-5 (see Appendix 8.3) the following measure is recommended:

- R-1** Prior to recordation of any tract maps within the Piru Expansion Area, applicants shall identify one or more park sites acceptable to the County Parks Department and the Piru Park and Recreation

Commission totaling at least 7.2 acres and must guarantee, to the County's satisfaction, full funding for site acquisition, planning, grading, construction of park facilities, landscaping, and long-term operation and maintenance of the park(s). Unless otherwise agreed upon by County and the developers, the cost of this mitigation shall be allocated based upon the number of dwelling units planned by each project component. (Component A: 60 = 15.23%, Component B: 104 = 26.40%, Component C: 185 = 46.95%, and Component D: 45 = 11.42%).

The full funding guarantee can include any combination of grants, Quimby fees, special tax, homeowner association fees, or developer contributions, and may include formation of a County Service Area (CSA) or Community Services District (CSD) or similar mechanism acceptable to the County.

Local Park Location Options

The Piru Area Plan Update Committee and County Parks Department has suggested evaluation of four alternative park sites within or adjacent to the Piru Community. These site locations are illustrated in Figure 4.15-2 and are described as follows:

Park Location Option 1 (South of the Piru Citrus Association packing plant at Main Street, within the James Finch Component)

A local park at this location would be accessible to project residents and the entire community. Because the site is controlled by one of the applicants, the site is readily available for park development, assuming approval of the proposed General Plan Amendment. Because the location is within the development area, this park site location would support a more compact community. Environmentally, this site would not result in further loss of agricultural resources, would not be growth inducing and the site would have positive land use and aesthetic benefits as the park site would act as a buffer between the Fillmore-Piru Citrus Packing Plant and proposed residential areas and would provide a visual amenity along Main Street.

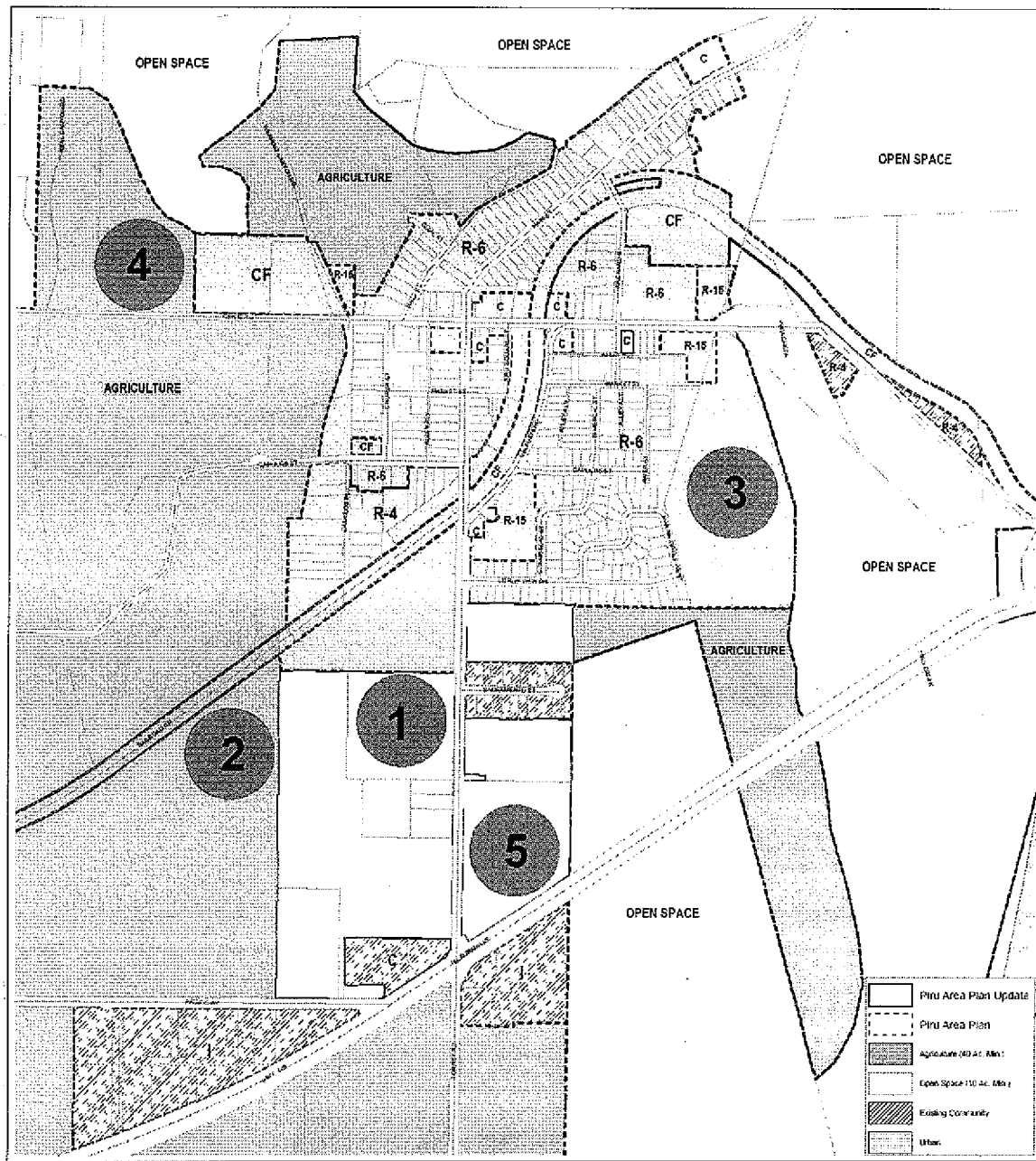
Park Location Option 2 (West of the Piru Expansion Area, south of the railroad tracks)

This park location is also on land owned by Mr. Finch and is favored by the landowner as it would not reduce the area available for housing development. However, a local park with athletic fields is an urban land use that would be inconsistent with the purpose and intent of the "Agricultural" General Plan land use designation and would require a Countywide SOAR vote. Aside from the cost, it is unknown whether the County electorate would support a park at this location. If the site were ultimately rezoned to "Open Space", the park would still be precluded by the County Zoning Ordinance from having night lighting or athletic fields. From a neighborhood planning perspective, a park at this location would be less accessible to proposed developments east of Main Street (John Reider and Dana Levy components), which would be providing a substantial portion of the financing for the proposed park. The site would result in the direct loss of an additional 7.2 acres of agricultural land and the Agricultural Commissioner's Office would recommend a buffer zone up to 300 feet around the park to minimize land use incompatibilities with remaining agricultural land. Additionally, the extension of utilities for the park and the placement of this urban land use west of Warring Wash would potentially induce growth west of the Piru Expansion Area.

Park Location Option 3 (Within the Camulos Ranch orchard property, between the Citrus View Tract and Piru Creek)

This site is approximately 20 acres in size. Although it is currently planted in citrus, the site is planned and zoned for urban residential development. This site owned by the family of Mary Rubel Burger (Camulos Ranch), thus is not under the control of any of the Piru Expansion Area developers. This park location has an existing urban Zoning and General Plan designation, thus no SOAR vote would be required. Because the location is within the existing Piru Community, this option is also considered to support a compact community. However, the park site would not be as convenient for any of the proposed developments within the Piru Expansion Area that would be providing the financing for the proposed park. A park at this location may be more expensive to build because the site is within a flood

Figure 4.15-2 Park Location Alternatives



hazard area. Also because the site is in an undeveloped area, roads and bicycle/pedestrian pathways may need to be extended to the site to provide access.

Park Location Option 4 (West of Piru Elementary School)

This site is currently utilized by Lavern Nursery and contains a single family residence. The principal advantage of this site is the opportunity for joint use of facilities and shared maintenance costs with Piru School. This would allow Piru School to expand to accommodate the proposed development without buying more land to replace field space. The park site is designated Agriculture by the General Plan and would have similar impacts and constraints as discussed for Park Option 2 above, except that the single-family residence would have to be acquired, the park would not be as conveniently located for any of the Piru Expansion Area developers, and land owners have expressed a reluctance to sell the land for park purposes. A park in this location may exacerbate existing circulation problems associated with before and after school drop off/pick up of students. Additionally, the placement of this urban land use west of Piru School would potentially induce growth in agricultural areas along West Center Street.

The following park location option was added as a result of significant traffic highway noise impacts identified in conjunction with the proposed residential development of the James Finch and Dana Levy components.

Park Location Option 5 (Adjacent to Highway 126)

This park location is owned by the applicants, thus is readily available for park development. Because the park is located within the development area, this option supports a more compact community. Environmentally, this site would not result in further loss of agricultural resources, would not be growth-inducing, would provide a landscaped entry to the Piru Community and would help to mitigate significant noise impacts from highway 126 on the proposed residential area. Attention would need to be directed towards design and provision of appropriate fencing of the park to prevent errant balls from entering Highway 126. Such fencing would need to be carefully designed to minimize adverse aesthetic impacts to the community.

Other Park Location Options

Other park location options considered and rejected by the Piru Area Plan Update Committee include the existing Piru School site and the United Water Conservation District (UWCD) percolation basin, east of the Piru Expansion Area. The Piru School park alternative was rejected because the Committee wanted to preserve the existing elementary school and because of questions of feasibility due to the lack of alternative school sites that would not be within the inundation area of one or more dams. The percolation basin park alternative was eliminated because UWCD staff, while expressing a willingness to consider recreational uses of the percolation basin site, indicated that use of turf would introduce potential contaminants into the aquifer and would not be consistent with the UWCD mission. The inability to utilize turf would preclude use of this park site for softball or soccer fields.

The owner of the Rancho Temescal project has recently proposed a park site in connection with his proposed development project. The Rancho Temescal proposed park would be located east of Piru Creek and northeast of existing Warring Park. The proposed park site is 14.4 acres with about 8 acres of the site usable for parkland purposes. The park site is on "locally important" farmland and is designated "Open Space" and thus would not be able to accommodate nighttime lighting or athletic fields. Re-designating the park site to "Urban" would require a SOAR vote.

The environmental effects of the above five park location options are compared in Figure 4.15-2. Based on the environmental factors identified in Figure 4.15-2, Park Location Option 1 (South of the Packing Plant at Main Street) and Park Location 5 (Adjacent to Highway 126) would be the environmentally superior location options and are the only options which are indisputably feasible.

Mitigation of Cumulative Parkland Deficiency

- R-2 The Parks Department should be directed to revise and update the County Quimby Ordinance to ensure that local park developer fees are adequate to ensure development of local parkland to

County standards. Additionally, the Parks Department should be directed to develop a funding mechanism to ensure adequate long-term maintenance and operation of existing and future local parks, including Piru Town Square.

The Quimby Ordinance has not been revised since it was adopted in 1978. However, raising developer fees to ensure acquisition of more local parkland as the Piru Community grows will not be effective unless a means can be found to pay for the long-term maintenance and operation of these parks. Options could include the creation of an endowment, a parcel tax, formation of a Park District, Community Services District or County Service Area, or homeowners association fees. As indicated in the setting section above, Piru Town Square is currently being maintained by the Piru Redevelopment Agency (RDA). The RDA is not appropriate for funding long-term maintenance and is scheduled to expire in 2016.

Private Recreation Facilities

R-3 In addition to providing funds for a public park, each applicant for a residential planned development within the Piru Expansion Area shall be required to provide on-site private recreation facilities for residents. A plan for private recreation facilities shall be approved by the Planning Division prior to recordation of any tract map in the Piru Expansion Area. The plan should include facilities for toddlers, youths and adults. These may include a tot lot, skate park, basketball court, volleyball courts, jogging/exercise facilities and/or picnic tables and barbeque areas.

Mitigation of Regional Trail Deficiency

R-4 Prior to recordation of any tract map within the Piru Expansion Area, applicant's shall fund a detailed landscaping and design plan for a bicycle and pedestrian pathway plan that will provide at least 3.6 miles of Class I bicycle and pedestrian pathway including both sides of Main Street between Highway 126 and the railroad tracks, and other locations within the proposed development or within the community as may be approved by the Planning Director in consultation with the Piru Neighborhood Council. Funding for the construction and long-term maintenance of the pathway system shall be guaranteed prior to recordation of any tract map within the Piru Expansion Area. In lieu of construction of off-site improvements, applicants may opt to enter into an agreement with the Los Padres National Forest or the United Water Conservation District to fund construction and/or long-term maintenance of public Class M hiking/equestrian trails within the Piru Area of Interest.

Funding the construction cost should be the responsibility of the applicants. A Community Services District (CSD), County Service Area (CSA) or a Homeowner's Association could provide the necessary guarantee of long term funding for maintenance of the pathway system. An improved pedestrian pathway system can provide improved access between the proposed development and the highway-oriented commercial center as well as downtown Piru, Piru School and the proposed park or could provide recreational access along Piru Creek or the Railroad right-of-way.

4.15.4 Residual Impact

If all of the above mitigation measures are adopted, impacts on local parks and trails would be reduced to less than significant levels. However, residual impacts may occur with respect to development of the proposed park, depending upon which park site alternative is selected. For example significant loss of agricultural resources would occur if the new park is located in an agricultural area outside the Piru Expansion Area. Significant growth inducement impacts could occur if the park site selected is located outside the Piru Community. And potentially significant biological resource and flood hazard impacts could occur with respect to the Camulos Orchard park site alternative. Mitigation as recommended above will assure compliance with General Plan Goal 4.10.1-1, Goal 4.10.1-2, Goal 4.10.1-5 and Policy 4.10.2-1 and Piru Area Plan Goal 4.7.1-3, Policy 4.7.2-2 and Policy 4.7.2-3.

Figure 4.15-2 Ranking of Park Location Options

Environmental Factors	Park Location Option 1 South of packing plant	Park Location Option 2 West of Expansion Area	Park Location Option 3 Camulos Orchard Property	Park Location Option 4 West of Piru School	Park Location 5 Adjacent to SR-126
Accessible to Project and Community	Good accessibility to proposed projects and existing community.	Good accessibility to Finch project; Poor accessibility to projects east of Main Street and balance of existing community.	Good accessibility to existing homes in eastern Piru; Poor accessibility to project, limited accessibility to balance of community.	Poor accessibility to project; Good accessibility to community, particularly existing homes in western Piru.	Good accessibility to proposed projects, somewhat longer walking distance for balance of community.
Loss of Agricultural Soils	No additional loss of agricultural land.	Loss of 7.2 acres plus agricultural buffer area.	Loss of 7.2 acres plus agricultural buffer area, but area is already designated for urban development.	Loss of 7.2 acres plus agricultural buffer area.	No additional loss of agricultural land.
Land Use Conflicts	Park would provide a buffer between proposed residential development and existing packing plant.	Conflicts with adjacent agricultural operations and an additional agricultural buffer would be required. Conflicts between proposed residences on Finch project and packing plant.	Conflicts with remaining agricultural operations. A temporary agricultural buffer would be required until the remaining agricultural land is converted to urban.	Conflicts with adjacent agricultural operations and an agricultural buffer would be required.	Park would provide a buffer between proposed residential development and Hwy 126 and would help to mitigate significant noise impacts.
Potential for Growth Inducement	None	May induce additional urban growth in agricultural areas west of Warring Wash.	Area is already designated for urban use. May expedite conversion from agriculture to urban.	May induce additional urban growth in agricultural areas along west Center Street.	None
Night Lighting/Athletic Fields	Allowed	Not permitted	Allowed	Not permitted	Allowed
Biological Resource Impacts	None	None	Site is adjacent to Piru Creek which is identified as a significant wetland, natural area, and habitat for identified sensitive species.	None	None
Hazards	Site is within dam inundation, groundshaking and liquefaction hazard zones	Site is within dam inundation, groundshaking and liquefaction hazard zones	Site is within dam inundation, groundshaking, liquefaction and flood hazard zones.	Site is within a groundshaking hazard zone	Site is within dam inundation, groundshaking and liquefaction hazard zones. Errant balls could enter Hwy 126.
Circulation Issues	No conflicts	Access to park would have to be through the proposed Finch subdivision	Streets may need to be extended to the park.	May exacerbate existing before and after school circulation problem	No conflicts
Feasibility	Yes, SOAR vote not required	SOAR vote is required. Feasibility is dependent upon outcome of SOAR vote.	SOAR vote not required. Feasibility is dependent upon willingness of land owner to sell property.	SOAR vote is required. Feasibility is dependent on outcome of SOAR vote and willingness of land owner.	Yes, SOAR vote is not required
Environmental Ranking	1	4	3	5	1

4.16 Community Character

The Ventura County *Initial Study Assessment Guidelines* define the criteria and methodology for determining whether a proposed project may have a significant adverse impact on community character. Community character is defined as the distinctive physical quality, attributes, or features of a community that sets it apart from other communities or areas. All projects would have some degree of impact on community character. Projects that are consistent with the zoning and the General Plan designation would have a less-than-significant impact on the land use of the area when the design/architecture of the project is compatible with the surrounding community. Any project that requires a Zone change and/or General Plan Amendment must be evaluated for its potential to significantly alter or degrade community character.

4.16.1 Environmental Setting

Proposed Expansion Area – The proposed Piru Expansion Area is developed primarily with agricultural operations, including citrus cultivation and row crops. The area also includes 9 single-family homes: one on the Rieder site (Component A), one on the Levy site (Component B), two farmworker residences on the Finch site (Component C) and the remaining 5 houses (including one second dwelling unit) are within the Component D portion of the expansion area. The area also includes a natural gas metering and regulator station operated by Southern California Gas Company, an agricultural produce stand (on the Levy site) and a water well, owned by Rissman Mutual Water Company, located within the Component D area.

Piru Community – This town of 502 homes on 130 acres is a mix of turn-of-the-century and newer suburban residential blocks.

The residential portion of the community comprises about 85 acres and is currently zoned as follows:

- 40.0 acres of R-P-D-6 (Residential Planned Development, 6 dwelling units/acre) and
- 25.7 acres of R-1 (Single-Family Residential 6,000 sq ft. minimum lot size),
- 12.8 acres of R-E (Rural Exclusive, 10,000 sq. ft. minimum lot size),
- 6.6 acres of R-P-D-15 (Residential Planned Development, 15 dwelling units/acre).

The character of Piru residential areas is affected by a number of design elements; including lot width, lot size, front setbacks, driveway and garage placement, architectural form and style, exterior wall/fence placement and treatment, and sidewalk placement/design. Architectural form refers to the height, bulk, and placement of buildings on the land. Architectural style refers to a building's construction design details and materials that contribute to the character of the building (e.g., Craftsman style, Victorian style). While diversity of design elements and creativity are important in crafting interesting neighborhoods, inappropriate use of non-contextual building forms can adversely affect community character. For example, a geodesic dome hidden in a forest may be an appropriate building form for a house, but in an urban residential neighborhood context, it would detract from design coherence and community value.

Residential development in the older neighborhoods of Piru is characterized by relatively smaller homes on relatively narrow and deep lots. Most of the residential blocks are predominately developed with single-story, detached single-family architectural form (Figure 4.16-1). An exception to this is the Citrus View Tract (two story, detached single-family dwellings) and the adjacent Colina Vista Apartments (two-story attached multi-family dwellings). See Figure 4.16-2 and Figure 4.16-3.

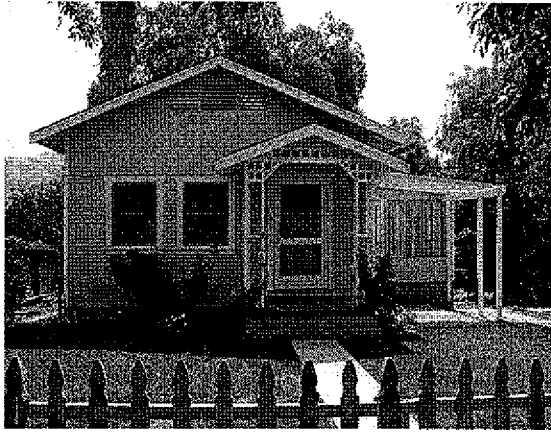


Figure 4.16-1 Typical single-story architectural form in Piru

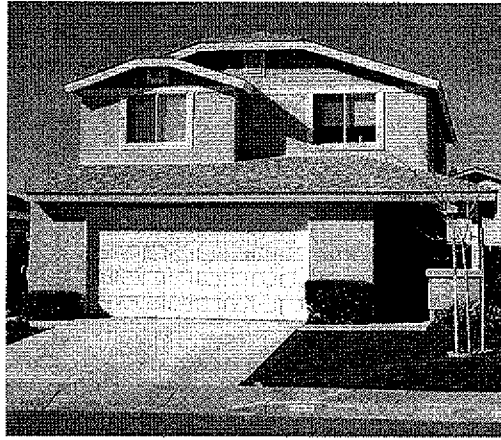


Figure 4.16-2 Two-story Citrus View Tract home

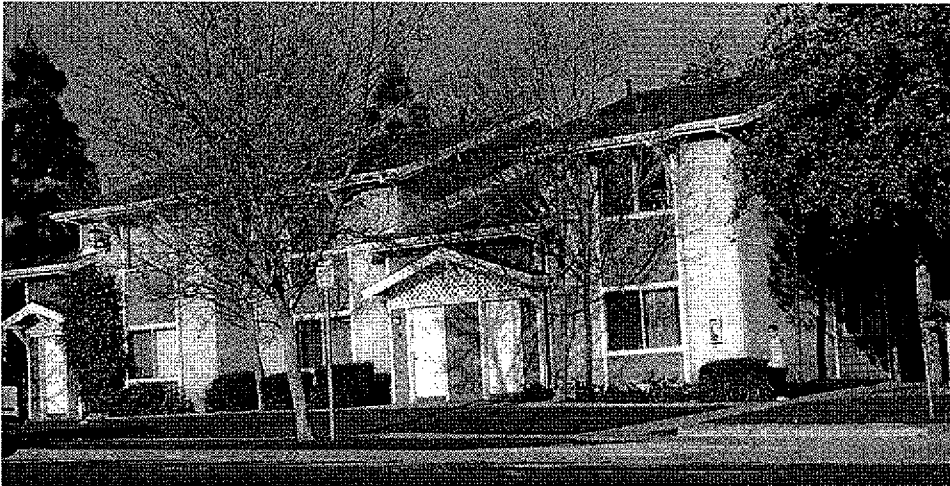


Figure 4.16-3 Two-story Colina Vista Apartments

Lot width in the residential areas of Piru is most commonly 50 feet, although much wider lots (75-100 feet) are interspersed in nearly all of the older residential blocks. Lot widths of 40 foot are prevalent along east Market Street and surrounding blocks.

Residential parcel sizes vary considerably from large lot rural single-family homes in the vicinity of Camulos Place, where lots average 17,000 square feet, to the Colina Vista apartment complex which contains 50 units on 3.2 acres. Average residential lot size within the community is estimated to be about 7,000 square feet, although lot size varies widely from block to block.

Front setbacks within the community average around 20 feet, but vary widely within the older neighborhoods. Existing rural homes along south Main Street (within the Piru Expansion Area) have much larger front setbacks, averaging 44 feet.

The older portion of the community is laid out generally in a traditional grid street pattern with landscaped parkways. About a third of the residential neighborhoods have rear alleys for garage access. Residential parking in the older neighborhoods is generally provided by single-car garages or porte-cocheres. Many of the older homes have no covered parking at all.

Newer residential tracts (Citrus View and Habitat for Humanity) generally reflect a more suburban style street pattern (curvilinear streets and cul-de-sacs) with monolithic sidewalks (adjacent to the curb). These newer subdivisions utilize attached two-car garages, accessed by driveways entering from the street rather than from rear alleys.

Architectural style can be reflective of the best architecture of the existing community and thereby promote cohesiveness between the existing community and the new development. Conversely, architectural style can be used to distinguish one area from another. Good architectural style must strive for a balance that avoids too similar design, promoting visual monotony, and too great a mix of architectural styles, resulting in visual confusion and disharmony. Either case can result in significant community character impacts.

Much of the Piru Community homes are constructed in the Craftsman style. Some of the homes in Piru contain Victorian or Spanish style details. The newer tracts (Citrus View and Habitat for Humanity) attempt to incorporate some of the Craftsman design details, such as clapboard siding, front porches and exposed rafters, but also include the liberal use of stucco siding that is indicative of a more modern, suburban style.

The Piru Community includes a small turn-of-the-century downtown business district located primarily on Center Street, between Main Street and Orchard Street. The community also includes a newer highway-oriented business district located at Main Street and Highway 126. Both commercial districts contain a substantial amount of vacant commercial property.

The most significant Industrial property is the Fillmore-Piru Citrus Association Packing Plant, located south of the railroad tracks and west of Main Street. Additional, largely undeveloped, industrial properties exist along Highway 126.

The community includes several distinctive public land uses including: Warring Park and Community Center, Piru Cemetery, the train depot and gazebo at Piru Town Square, Piru Elementary School, and several architecturally or historically significant landmarks including the David Cooke Mansion, Heritage Valley Inn, and Piru Methodist Church, among others.

4.16.2 Impacts

Loss of Rural Agricultural Entryway to the Piru Community

The Piru Community is currently separated from Highway 126 by a 750 to 1,700 foot wide rural agricultural area (the Piru Expansion Area). This rural agricultural area separates the Piru Community from Highway 126, and helps to define the Piru Community and creates a real sense of arrival. The proposed project would replace this rural agricultural area with urban residential development, connecting the existing community to existing commercial and industrial development along the Highway 126 corridor. For some Piru residents, the loss of this rural agricultural entryway to the community would be perceived as a significant adverse impact on community character, no matter how well the proposed project was designed.

The following analysis of community character impacts is provided for each project component:

Community Character Impacts Associated with John Rieder Project (Component A)

Mr. Rieder proposes townhouse complex consisting of six duplexes, four triplexes, and nine 4-plex units for a total of 60 dwelling units on five acres. The Rieder site is surrounded by single-family detached residential units to the north and south, the Fillmore-Piru Citrus Association Packing Plant to the west and the United Water Conservation District's percolation ponds to the east. Approximately 250 feet to the north is the Colina Vista apartment complex which is developed with 50 dwelling units on 3.2 acres.

While single-family detached development would be more consistent with immediately adjacent land uses, multi-family attached development exists within the vicinity. Therefore, the proposed architectural form is not significantly out of character with nearby land uses.

With respect to architectural design, the proposed development is two-stories in height. The project attempts to incorporate Craftsman style elements (low-pitched roofs, projecting eaves with exposed wood rafters, clapboard siding, and tapered river rock covered foundations). While all of the proposed buildings are two-story, the height is visually alleviated to some degree by the use partial one-story development with roof-lines at the first floor level.

Each unit is provided with a 60 square foot covered porch and a small (approximately 300 square feet) of private fenced yard area. Most units would front on one of three small landscaped greens/stormwater detention basins providing a total of 28,400 square feet of private community landscaping/open space. The units fronting on Main Street would have access to four small landscaped areas totaling approximately 5,000 square foot of additional landscaping in the entry area for a grand total of about 33,400 square feet of open space/landscaping (15.4 percent of the site). This would provide about 557square feet of shared landscaping/open space per dwelling unit).

The scale and bulk of the proposed buildings, particularly the triplex and 4-plex units, exceed the building bulk of the adjacent single-family neighborhoods. The view from Main Street would be of two duplexes and one 4-plex.

The 4-plex is set back only 10 feet from the proposed public sidewalk, and a privacy fence would be located immediately adjacent to the sidewalk. Thus, the development would visually appear to have a zero front yard setback along Main Street. Piru residents have complained about existing walls on Main Street, which tend to collect graffiti and isolate residential areas from the community. Existing setbacks along Main Street, south of the railroad tracks range from 25 to 75 feet, and average 44 feet. North of the railroad tracts, within the urban community, front yard set backs range from 10 to 85 feet, and average 25 feet. Given the oversized bulk of the 4-plex buildings and the lack of an adequate front setback, the proposed apartment building's architectural form is regarded as having a significant adverse impact on community character, as viewed from Main Street (Figure 4.16-4).

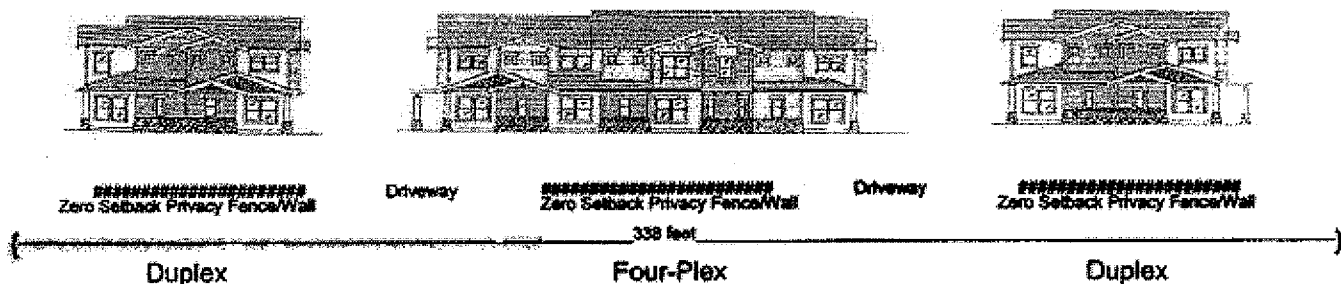


Figure 4.16-4 Main Street View of John Rieder Project

Community Character Impacts Associated with the Dana Levy Project (Component B)

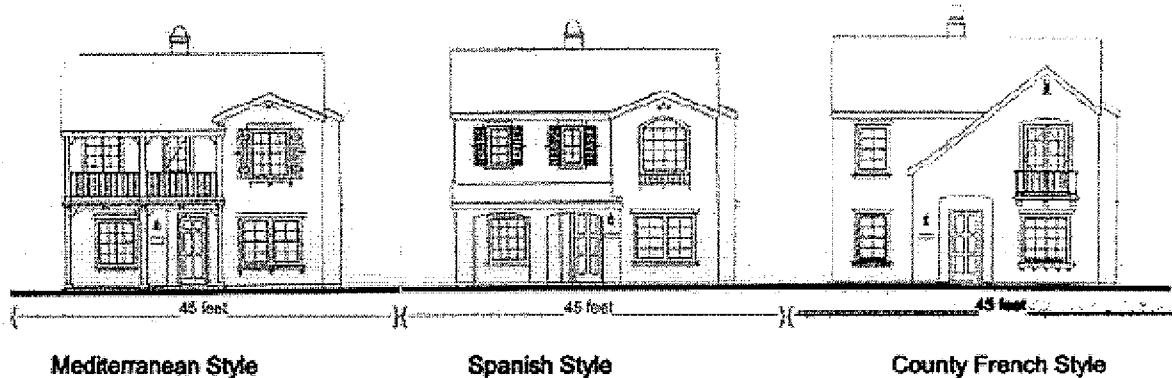
Mr. Levy proposes a small-lot, two-story single-family development of 104 homes on 16.5 acres. Proposed lot widths average 45 feet and lot sizes range from 3,952 to 6,380 square feet, with an average of about 4,000 square feet. By comparison, most lots in Piru are 50 feet wide and the smallest existing lots in Piru are found within the Citrus View Tract with an average lot size of 5,772 square feet. Residential blocks in the vicinity of east Market Street (River Street, Temescal Street) are about 40 feet in width, but average nearly 6,970 square feet due to greater depth, and are served by alleys.

Surrounding land uses include single-story, single-family dwelling units on 7,000 square foot lots to the north (Habitat for Humanity tract), UWCD percolation ponds to the east, Highway 126 and vacant industrial property to the south, and agricultural (Finch project) and large-lot rural residential development ((1/2 acre and one-acre lots) to the west across Main Street. Within the project area is a small (0.09 acre) site used by Southern California Gas Company for metering and re-pressurizing natural gas.

Architectural treatment of the proposed housing units along Main Street include: a Spanish style, a Monterey style, and a Country French style. While the Spanish and Monterey styles arguably reflect the existing community architectural heritage by employing some of the elements of Craftsman and Spanish style architecture, the Country French style introduces a new architectural style to the Piru Community. All three styles utilize the same floor plan, and except for a few minor differences in

decorative elements, visually look the same, thus resulting in a fairly monotonous row of housing units with uniform two-story height and uniform 20 foot setbacks (Figure 4.16-5).

Figure 4.16-5 Dana Levy Component Main Street View



Most of the proposed houses along Main Street face Main Street and rear garage access would be provided by an alleyway, minimizing the need for curb cuts on Main Street. This street facing orientation generally relates to the existing houses along both sides of Main Street, albeit with much smaller lot sizes. Two of the proposed houses would have a side orientation to Main Street and would likely result in placement of additional privacy walls on Main Street. As previously discussed, Piru residents have complained about existing walls on Main Street, which tend to collect graffiti and isolate residential areas from the community.

The interior lots, would utilize three different floor plans, combined with the three architectural styles, and would provide a little more visual variety. All of the interior houses would employ two-story construction and uniform 20 foot setbacks (Figure 4.16-6).

Figure 4.16-6 Dana Levy Component Interior Lot Dwelling Unit Elevations



Interior lots would be accessed by public streets as narrow as 32 feet in pavement width. Such streets ~~are inconsistent with existing road standards in would require an amendment to the Piru Area Plan and approval of a deviation from the County Road Standards by the Public Works Department.~~ This proposed narrow street would accommodate on-street parking only on one side.

All of the proposed streets would utilize monolithic sidewalks (no parkways). This would be contrary to the existing requirements of the Piru Area Plan and is considered a significant adverse impact on community character (Figure 4.16-7 and Figure 4.16-8).

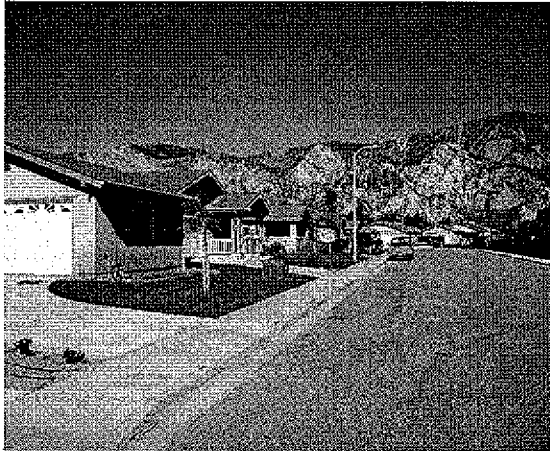


Figure 4.16-7 Monolithic Sidewalk



Figure 4.16-8 Sidewalk with
Landscaped Parkway

The interior lots would have two-car garages accessed from the front of the property. Visually, the two-car garage occupies more than half of the building frontage, thus dominating the front of the house. It is noted that the Market Street neighborhood, which also utilizes narrow lot widths, is served by a rear alley.

Because of the narrow width of the lots (45 feet wide) and the 20 foot curb cuts required to access the front-loaded garages, combined with narrow streets which limit parking to one side, minimal on-street parking ($\frac{1}{2}$ space per dwelling unit) would be available for guest parking. No additional guest parking is proposed.

Although a 0.2 acre landscaped lot in connection with a 1.4 acre stormwater detention facility would be provided near Highway 126, the project does not include any public or common recreation areas.

The proposed small sized lots combined with uniform two-story architectural form, with minimal side yards and two-car garages dominating the front of the houses, lack of adequate guest parking and common recreation areas would create the appearance of an overcrowded, automobile dominated residential tract, which is not in character with majority of the existing residential areas of the Piru Community. Additionally, the very similar appearing residential units planned along Main Street would create a monotonous and overcrowded appearance along this vital entry corridor to the Piru Community. For these reasons this component is regarded as having a significant adverse impact on community character.

Community Character Impacts Associated with the James Finch Project (Component C)

No tract map has been submitted for the Finch component, therefore it is not possible to provide a review of the proposed development other than to note that the project is expected to provide up to 185 dwelling units in a mix of single-family, duplex and multi-family development, and may include a park.

Surrounding land uses include the Fillmore-Piru Citrus Association Packing Plant to the north, large-lot rural residential along the west side of Main Street, single-family residential (Habitat for Humanity

Tract) and agricultural orchards (Levy project) east of Main Street, a gas station and mini-market and vacant commercial and agricultural (Thompson property, Ventura County component) to the south and agricultural fields to the west (also owned by Mr. Finch.).

The community character impacts cannot be determined for this component until more detailed plans have been submitted.

Community Character Impacts Associated with the Ventura County Component (Component D)

No tract map has been submitted and none of the property owners have indicated any desire to develop within this component. Nonetheless, since these properties are surrounded by the Finch component, it is assumed that they would eventually develop at a similar density.

Surrounding land uses include agricultural to the north (Finch property), vacant commercial and agricultural land (Levy project) to the east, agricultural (Finch property) and vacant industrial and the Palms apartments (south of Pacific Avenue).

The community character impacts cannot be determined for this component until more detailed plans have been submitted.

General Plan Policies

The General Plan goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the General Plan goals, policies and programs relevant to community character.

The *Piru Area Plan* goals, policies and programs were reviewed for their applicability to the proposed project. The project was determined to be consistent with the relevant Piru Area Plan goals, policies and programs, with the exception of the following:

Policy 1.3.2-4 State Highway 126, [and] Main Street, [...] are hereby designated as Local Scenic Roads. Discretionary permits located within view of a Local Scenic Road shall be reviewed for compliance with the following criteria: [...]

(d) Discretionary development shall be designed consistent with the *Piru Community Design Guidelines*.

Policy 1.4.2-3 *Discretionary development* shall be encouraged to adopt architectural designs which reflect the historical and cultural traditions of the area.

Policy 3.5.2-3 Discretionary residential development shall be conditioned to incorporate good design standards and maintain the character of the Piru Community consistent with the Piru Community Design Guidelines.

These policies are in support of the following goal:

Goal 3.1.1-3 Ensure that existing and future land use patterns result in a cohesive and consolidated community.

The existing *Piru Area Plan* Community Design Guidelines do not currently provide any specific requirements for residential development. Therefore, Criterion (d) of Policy 1.3.2-4 technically does not apply. However, one of the purposes of the Piru Area Plan Update was to ensure that the new development is well integrated with the existing community. Toward this end the Piru Area Plan Update Committee considered Residential Design Guidelines to ensure that the new development reflected the architecture and character of the existing community and the enhanced Main Street concept was drafted to emphasize the Main Street corridor connection between the new development and the existing community (see Appendix 8.3).

The proposed Rieder project would be inconsistent with proposed Piru Residential Design Guidelines that would discourage walls or fences along Main Street in excess of 3 feet in height. The proposed Levy subdivision would be inconsistent with proposed design guidelines which require that garages be de-emphasized, that tree planted parkways be provided, that traffic calming features be incorporated

into the project, that houses be designed to avoid excessive uniformity of styles and exterior treatments and that housing styles reflect the historical and cultural traditions of the Piru Community. Additionally, two of the Levy homes would have a side orientation to Main Street, contrary to the proposed Residential Design Guidelines and would presumably require privacy fencing along Main Street in excess of three feet.

4.16.3 Mitigation Measures

Mitigation for Loss of Rural Agricultural Entryway to the Piru Community

CC-1 Develop properties adjacent to Main Street with large-lot, single-family (or duplex units designed to look like large single-family units) residential development with average 75 foot lot width, 10,000 square foot average lot size and a variable front setback, averaging 25 feet on each lot, with a minimum of 20 feet, unobstructed by walls or fences or hedges, and minimum 10 foot side yard setbacks.

CC-2 Prior to recordation of any tract map within the Piru Expansion Area, developers shall be required to fund preparation of a detailed enhanced Main Street plan entryway to the community featuring a landscaped median (first block only), coordinated planting and maintenance of parkway landscaping, pedestrian and bicycle pathways and an enhanced pedestrian crossing with bulb-outs and pedestrian-activated signal at the intersection nearest the park (Figure 4.16-9, Figure 4.16-10, Figure 4.16-11 and Figure 4.16-12).

The enhanced Main Street Plan shall include a full funding commitment for construction and long-term maintenance of landscaped parkways and medians and shall be reviewed and approved by the Piru Neighborhood Council, and approved by the Public Works Department, Fire Department and Planning Division prior to recordation of any tract map within the Piru Expansion Area. The landscape plan shall take into consideration truck and recreational vehicle usage on Main Street.

If additional right-of-way is required for off-site improvements, the developers shall make an offer to construct the required improvements. If the offer is refused, and the County does not agree to use its power of eminent domain, the developer's responsibility for off-site improvements will be deemed to be satisfied.

Unless otherwise agreed upon by County and the developers, the fair share cost for this measure shall be allocated based upon the percentage of linear street frontage along Main Street. (Component A: 338 LF = 10.54%, Component B: 1,313 LF = 40.94%, Component C: 1,215 LF = 37.89%, and Component D: 341 LF = 10.63%).

Large lot residential development, as described in measure CC-1, and an enhanced Main Street, as detailed in measure CC-2, would create a more stately character for Main Street and would establish a cohesive land use pattern for this important entryway to the Piru Community. Properties along Main Street could be developed with larger single-family homes or duplexes designed to emulate a larger single-family home. Single-family development (or duplexes designed to appear as single-family) along Main Street would be more in keeping with the character of Piru and the large homes on larger lots oriented around an enhanced Main Street landscape feature would create an attractive entryway for the Piru Community. This change would not substantially reduce the development potential along the Main Street Corridor. For example the Levy component proposes fifteen 45-foot wide residential lots along Main Street. Under measure CC-1, the same area could accommodate no more than ten large residential lots (75 foot wide). However, if each larger lot was developed with a duplex, the development potential of the Levy site would remain about the same. Implementation of measure CC-1 would cause Mr. Rieder to substitute about 14 apartment units for 4 large-lot residential properties. If the large lots were developed with duplexes, the change could result in a net loss of four to six dwelling units.

No urban development within the Piru Expansion Area can fully avoid the loss of the existing rural agricultural entryway. See Project Alternatives chapter regarding "No Project" and "Lower Density Project" alternatives. Nonetheless, the above measures can reduce the perceived impact. Whether

Figure 4.16-9 Enhanced Main Street Design Concept

Figure 4.16-10 Enhanced Main Street Concept - Cross-Section A

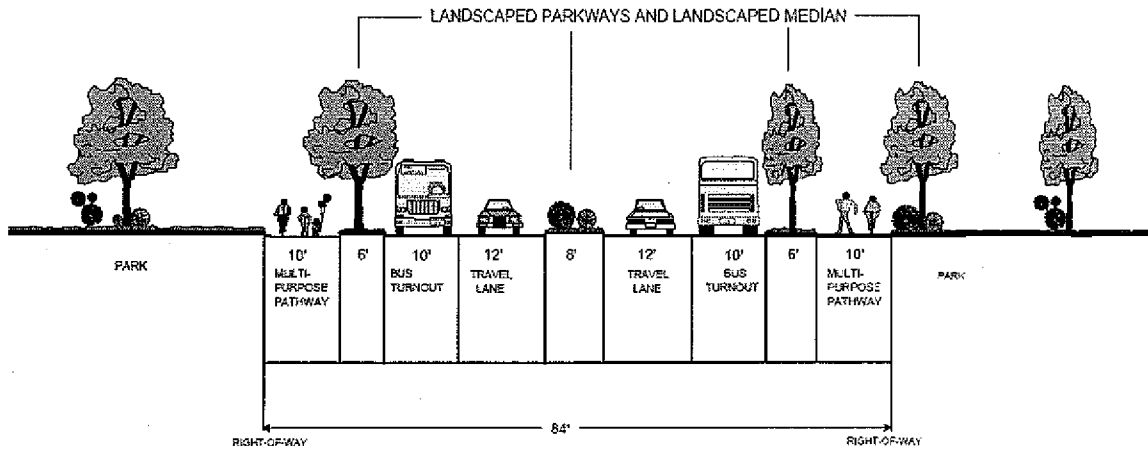


Figure 4.16-11 Enhanced Main Street Concept - Cross-Section B

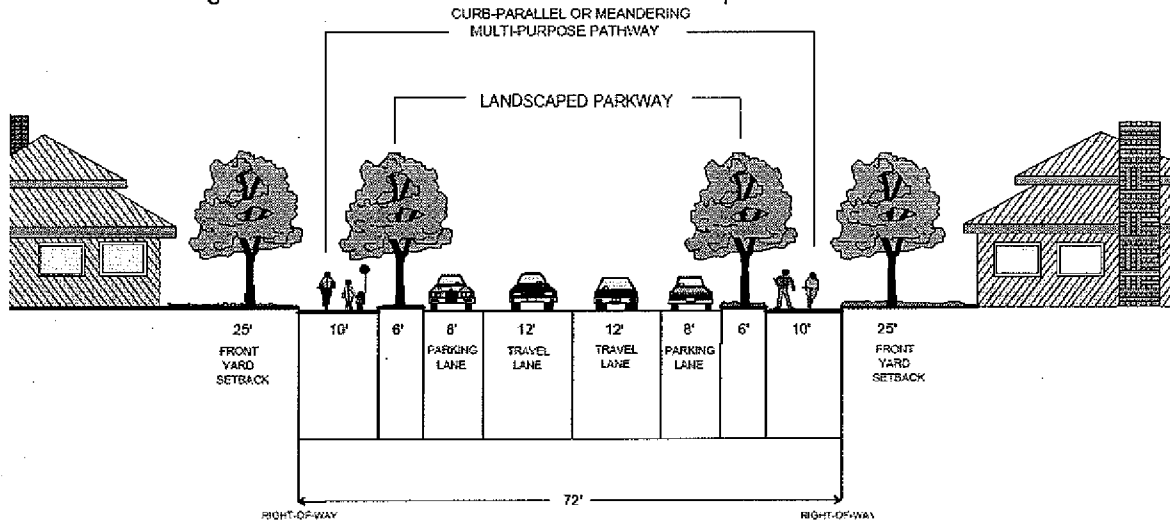
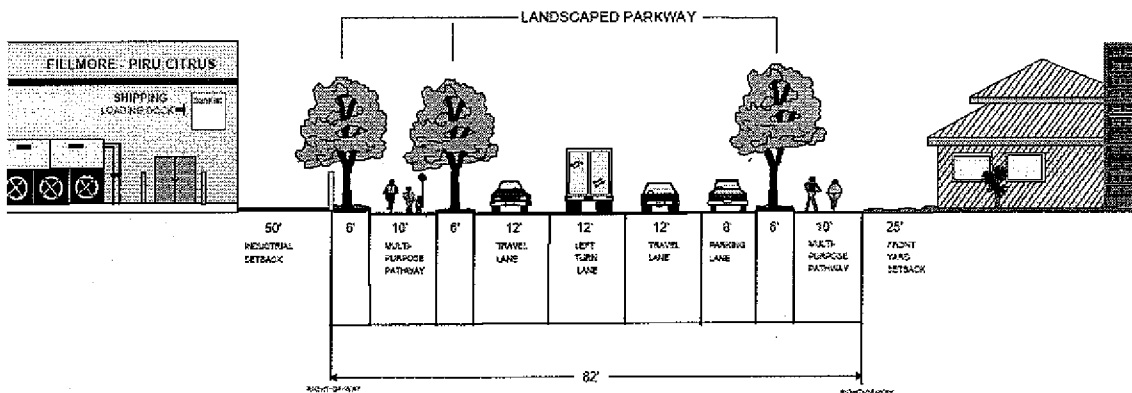


Figure 4.16-12 Enhanced Main Street Concept - Cross-Section C



the reduction would be less than significant would be up to the judgment of individual Piru residents. It is likely that some residents would continue to perceive the suggested project revision as a significant community character impact.

Mitigation of Community Character Impacts Associated with the Rieder Project

Mitigation CC-1 would largely resolve the community character impacts, with respect to architectural form (building bulk and front setbacks), associated with the Rieder project, at least as viewed from Main Street., reducing impacts to a less than significant level. Nonetheless, some Piru residents may continue to perceive the interior 4-plex units, or multi-family development in general, as an adverse community character impact, compared to the adjacent single-family residential development. To further mitigate impacts related to architectural form, the applicant could be required to eliminate the 4-plex units, limiting the project to duplex and triplex units. However, this measure would further reduce the development potential of the property by approximately six additional units. However, given that there are other multi-family developments in the vicinity (Colina Vista Apartments), this additional measure is not necessary.

Mitigation of Community Character Impacts Associated with the Levy Project

- CC-3** Architectural forms and styles, building elevations, colors and materials shall be reviewed and approved by the Piru Neighborhood Council and shall be designed to be consistent with the (proposed) Piru Community Residential Design Guidelines. The PNC shall respond in writing to the Planning Division either recommending approving the design or providing a list of corrections necessary to achieve consistency with the Piru Residential Design Guidelines. Such response shall be provided within 45 days of PNC's receipt of an architectural package including building elevations, site plans, and a palate of colors and materials. If substantial changes are made by the applicant in response to the PNC determination, the Planning Director may request additional review by the PNC. If the PNC fails to provide a written response within 45 days, the Planning Director is authorized to approve the architectural design, subject to the normal appeal process.
- CC-4** For houses fronting on Main Street, the developer shall employ a minimum of three distinctly different floor plans building footprints, with architectural styles reflective of the existing Piru Community.
- CC-5** Landscaped parkways shall be provided along all residential streets and shall be planted with trees designed to form a shade canopy over the street at maturity. Tree trimming within the parkway area shall be the responsibility of the a Landscape Maintenance District, homeowner's association or other means acceptable to the County.
- CC-6** Internal streets "A", "C", "D" and "G" shall be redesigned to comply with the County Road Standards that apply to Piru or the Fire Protection District's Private Road Guidelines. A deviation shall be obtained from the Public Works Department for any public roads not consistent with the applicable County Road Standards.
- CC-7** Attached garages facing the public street shall not exceed 33% of the front width of any house. This does not apply to garages accessed by a rear alley or garages set back behind the house and accessed by a single-car wide driveway.
- CC-8** Minimum lot width of interior lots shall be based upon the following standards (Figure 4.16-13):

Figure 4.16-13 Recommended Interior Lot Width Standards

GARAGE LOCATION/ORIENTATION/SIZE	MINIMUM LOT WIDTH
Garage entry is from a rear alley	45 foot
Garage is set back behind the house and accessed by a single-car wide driveway	50 foot
Attached tandem garage is accessed by a single-car wide driveway	50-foot
Two-car garage accessed from the street	65 foot



Measure CC-1 above will address the perception of overcrowding caused by two-story houses on very small lots along Main Street.

Measure CC-3 will ensure that the community has a say regarding the architectural design of the housing units planned within this and the other components. In the event the applicant and the Neighborhood Council are unable to agree on architectural details, the developer may appeal to the Planning Director to resolve any differences. Planning Director decisions regarding architectural design details may be further appealed to the Planning Commission and Board of Supervisors in the usual manner. Measure CC-4 will ensure that some variety in building form will be provided to provide some visual variety along the critically important Main Street corridor.

Measure CC-5 and CC-6 will correct inconsistencies with the existing Piru Area Plan and the County Road standards. It is noted that narrower than standard roads are encouraged under many modern planning movements (New Urbanism, Smart Growth, Neo-Traditional Planning and Livable Communities). Nonetheless, Public Works is responsible for ensuring safe public roadways.

Measures CC-7 and CC-8 are intended to encourage a less automobile oriented development. This measure could inspire a project redesign that would incorporate rear alleyways, or result in wider residential lots. See also measure CC-11, below.

Mitigation of Community Character Impacts in General

CC-9 All residential development constructed adjacent to Main Street shall be designed to face Main Street. No residential walls or fences over three feet in height shall be constructed along Main Street.

CC-10 Amend the proposed Piru Residential Guidelines to ensure that future development of the Finch and County of Ventura components would contain similar development as on the east

side of Main Street, with respect to lot width and size, setback and building height requirements and to ensure that proposed access roads align with the developments planned east of Main Street.

~~CC-11 Amend the Non-Coastal Zoning Ordinance to permit tandem garages (at least in Piru)~~

CC-11 Maintenance of private streets and alleys, detention basins and private recreation areas shall be the responsibility of a homeowner's association or other means acceptable to the County. Such facilities shall be subject to reviewed by the Sheriff's Department to ensure defensible space issues are addressed.

Measure C-9 reflects the community-expressed desire that any new housing on Main Street should have a frontal relationship, rather than a side or rear orientation. See proposed residential design guidelines in Appendix 8.3.

With respect to measure CC-10, it is difficult to create a cohesive urban form that does not require a similar development pattern on both sides of Main Street. Given that the applicants east and west of Main Street are on distinctly different time frames, it is important that the requirements for developing along Main Street be clearly articulated.

~~Measure CC-11 is intended to provide an additional option to reduce the automobile dominance in Piru subdivisions. In Piru, most homes have single-car garages or porte-cocheres. A tandem garage would provide additional covered parking while maintaining the appearance from the street of a single-car garage.~~

Measure CC-11 is intended to ensure that any private streets, alleys recreation areas and detention basins are safe and attractive, and are maintained over time.

4.16.4 Residual Impact

The recommended mitigation measures identified above would substantially reduce identified community character impacts. However, residual impacts associated with loss of the existing rural entryway to the community of Piru may continue to be perceived as significant to some Piru residents. Likewise, some Piru residents may perceive that any multi-family development, even limited to the rear of the Rieder project may still result in significant community character impacts. Likewise, utilization of lots smaller than what is typical for Piru on the interior of the Levy property may be perceived as a significant community character impact by some Piru residents.

Compliance with the residential standards proposed for the Piru Community Design Guidelines and the recommended mitigation measures would assure compliance with applicable Piru Area Plan goals and policies.

4.17 Growth Inducement

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR discuss the growth-inducing impacts of the project. The Guidelines defines growth inducement as the way in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth inducement is further defined in the Ventura County *Initial Study Assessment Guidelines* as any action that would eliminate or remove an impediment to growth in an area. This includes both physical impediments (e.g., lack of sewers, constraints on water supply) and policy impediments (e.g., general plan policies, zoning ordinance regulations).

Under the CEQA Guidelines, there is no requirement that growth-inducing impacts be characterized as either significant or less-than-significant. Nonetheless, according to the County *Initial Study Assessment Guidelines*, the significance of the growth inducing impacts of a project should be determined on a case-by-case basis and depend on:

- How much added growth/development would be accommodated by removing the impediment and setting a precedent for similar actions in the future;
- Whether that growth is consistent with the planned land use of an area; and
- The physical impacts of said growth (secondary impacts).

4.17.1 Environmental Setting

The County General Plan and Piru Area Plan, in concert with the Zoning Ordinance, specify where and what general types of land uses can be built within the Piru Area of Interest. The proposed Piru Expansion Area is currently designated Agricultural. Amendments to the General Plan are permitted up to four times per year. However, in Ventura County a County-wide voter-initiated Save Open-space and Agricultural Resources (SOAR) ordinance was enacted in 1998. This ordinance generally prohibits urban conversion of unincorporated land designated as Agricultural, Open Space or Rural unless a majority of the County voters approve a ballot measure allowing such a change. The County SOAR ordinance specifically excludes the Piru Expansion Area *"in recognition of the urban nature of the Piru Community and to provide essential flexibility to the Board of Supervisors to address the special needs of that community"*. The proposed Piru Expansion Area includes virtually all of the area exempted by SOAR, except for a half-acre located south of Highway 126 (portion of APN# 057-0-01-18). The SOAR ordinance is operative through the year 2020. Therefore, the SOAR ordinance serves to limit potential urban development within the county to fixed geographical areas (with most urban development within the ten cities) and serves as a major constraint to change through the year 2020.

4.17.2 Impacts

Because the SOAR ordinance precludes further conversion of other agricultural lands without an affirmative vote of the County electorate, the proposed general plan amendment and zone change for the expansion area are not expected to set a precedent for further conversion of agricultural lands, with the possible exception of the half-acre parcel described above.

In order to develop the proposed Piru Expansion Area, additional roads would be required, and sewer, water, and flood control facilities would need to be extended to the site. However, the extension of urban infrastructure to the site can be adequately accommodated by service purveyors and would not be expected to facilitate additional development of adjacent areas because of SOAR limitations.

Therefore, the project is expected to have less-than-significant impacts to growth inducement.

4.17.3 Mitigation Measures

No significant growth inducing impacts have been identified; therefore no mitigation measures are required.

4.17.4 Residual Impacts

No significant growth inducing impacts have been identified.

5. Alternatives to the Proposed Project

CEQA requires that an EIR evaluate a range of reasonable alternatives that may feasibly attain most of the basic objectives of the project that may reduce or avoid one or more of the significant environmental impacts caused by the project. CEQA further requires an evaluation of the "No Project" alternative, even if it does not meet any of the project objectives, in order to provide decision-makers with a comparison of the impacts of approving the project with the impacts of not approving the proposed project. Alternatives that 1) fail to meet most of the project objectives, 2) are infeasible, or 3) would not avoid significant environmental effects need not be discussed in detail in the EIR (Public Resources Code, Section 15126.6).

Project Objectives

As indicated in the Project Description chapter, the project is a focused update to the County general plan to fulfill the following objectives:

1. Increase the housing land inventory for unincorporated Ventura County to help meet its long-term regional housing objectives.
2. Provide for a diversity of housing opportunities within a 62-acre proposed Piru Expansion Area.
3. Develop a cohesive plan for this area that integrates the new development with the existing community.
4. Update the goals, policies and programs of the Piru Area Plan to:
 - ▶ Ensure that any new community expansion will be provided with an adequate level of public services and does not exacerbate public facility and service levels currently provided to the Piru Community.
 - ▶ Ensure the enhancement of Main Street as the primary entrance to the Piru Community
 - ▶ Encourage the revitalization of the Piru commercial core by permitting mixed use development and allowing a greater range of allowable uses for the Heritage Valley Inn property.
 - ▶ Ensure that new residential neighborhoods reflect the historic architectural character of the existing Piru Community

Significant Impacts to be Avoided or Reduced

The following impacts of the proposed project were found to be significant and unavoidable, or the mitigation measures necessary to reduce the impacts of the project would have significant impacts:

- The proposed project would result in the addition of an estimated 52.99 lbs/day of ROG and 55.69 lbs/day of NO_x which, even after all feasible mitigation measures are imposed, would exceed the Air Quality Assessment Guidelines significance threshold of 25 lbs/day.
- The project would result in the direct loss of 57.3 62.3 acres of prime agricultural soils and up to 6.5 acres of additional prime agricultural soils if the agricultural buffer, stormwater detention and street circulation are developed west of the Finch property.
- The project (Components B) would result in visual impacts associated with loss of agricultural and mountain views from Highway 126, an eligible scenic highway.
- The project (Components B, C and D) would result in significant exterior noise impacts due to the proximity of Highway 126. If mitigation includes a sound wall/berm to address noise impacts, the wall/berm itself could result in significant visual and community character impacts.
- The project would generate an estimated 3,417 daily vehicle trips. Project and cumulative traffic would cause the intersections of Highway 126 at Center Street and Highway 126 at Pacific Avenue to fall below an acceptable level of service.

- If the School District expands Piru School to accommodate students generated by project and cumulative development, additional loss of prime agricultural soils would occur.
- If a required new park site is located in the agricultural area outside the Piru Community, additional loss of prime agricultural soils may occur, or if the Camulos orchard park site is selected biological resource impacts and flood hazard impacts may occur.
- The project would result in community character impacts due to loss of the existing rural-agricultural community entryway.

5.1 No Project and Rieder Only Project Alternatives

The following alternatives evaluate the effects of not approving the project or approving only infill development of the John Rieder site.

5.1.1 No Project Alternative

This alternative assumes that the proposed General Plan Amendment, zone change and associated tract maps are not approved, and that the Piru Expansion Area remains designated "Agricultural" by the County General Plan and Piru Area Plan. Under this alternative, the 62-acre Piru Expansion Area would be expected to remain largely as in the current state. No further subdivision would be possible, as the A-E zoning and existing General Plan designations require minimum 40-acre lots. (It is noted that all of the existing parcels within the expansion area are currently legally non-conforming.)

Under the "No Project" alternative, the following significant adverse impacts associated with the proposed project would be fully avoided:

- No reduction in ambient air quality
- No loss of prime agricultural soils
- No loss of historic resources
- No loss of agricultural or mountain views from Highway 126 (an eligible scenic highway)
- No significant exterior noise impacts from Highway 126
- No added traffic
- No increased demand for educational facilities
- No alteration of community character

Under the A-E zoning, each legal lot could be developed with a single-family home. Assuming each assessor's parcel within the Piru Expansion Area constitutes a legal lot, the existing A-E zoning could potentially accommodate an additional 4 principal dwelling units, in addition to the nine existing dwelling units. An estimated 15 additional persons could potentially reside within the Piru Expansion Area.

Also allowed by right are crop and orchard production, animal husbandry, relatively small structures for packing and preliminary processing of agricultural products, small-scale composting operations, greenhouses, wholesale nurseries, small produce stands, apiculture, vermiculture, small family day-care/residential care facilities and home occupations.

With issuance of discretionary entitlements, a variety of agriculture-related industrial uses are permitted such as agricultural contractor's yards, larger structures for agricultural processing, sales and related uses. Additionally, farmworker housing complexes or farmworker community centers are allowed uses, subject to issuance of a Planning Commission-approved Planned Development Permit.

Many of the uses allowed by right or by discretionary permit could result in significant noise, dust, odors, pesticide over-drift, and other potential land use conflicts to existing homes adjacent to the Piru Expansion Area (Citrus View and Habitat for Humanity subdivisions). Uses allowed by right would not require public hearings or legal notices nor would agricultural buffers be provided.

It is noted that under the No Project Alternative, cumulative development by 2020 would cause Main Street to decline in Level of Service from LOS B to LOS C (LOS C is still considered an acceptable level of service). Additionally, the intersections of Highway 126 at Center Street and Pacific Avenue would fall to LOS E and LOS F, which is not consistent with the County's adopted level of service standard.

Unlike the proposed project, the "No Project" alternative would not result in the protection of existing historical dwellings, nor help alleviate existing parkland deficiency as no new park would be provided, library facilities would not be expanded and Main Street would not be enhanced to accommodate pedestrians or bicyclists, or aesthetically improved. No additional TIME fees would be collected to fund identified Piru traffic and pedestrian safety improvements. In addition, this project alternative would not meet any of the project objectives listed above.

5.1.2 Infill Development of John Rieder Site Only

This alternative is similar to the "No Project" alternative, discussed above, but assumes that the John Rieder site would be allowed to develop as an infill development since the site is surrounded on three sides by existing urban development. Under this alternative it is assumed that the Levy, Finch and County of Ventura components would remain designated as "Agricultural" by the County General Plan and Piru Area Plan, and the Rieder property would be developed with up to 60 dwelling units. The estimated population would be 219 additional residents.

Under this alternative, the following significant adverse impacts associated with the proposed project would be avoided or reduced:

- o Less than significant impact on ozone precursors
- o No-Loss of five acres of prime agricultural soils (compared to the potential loss of 62.3 to 68.8 acres if the proposed project is approved)
- o No loss of agricultural or mountain views from Highway 126
- o No significant exterior noise impacts from Highway 126
- o Minor traffic increase
- o Less than significant impact on elementary school capacity

The development allowed under this "Infill" alternative would exceed the Piru Growth Area population projections and thus would be inconsistent with the AQMP and Policy 1.7.2-1 of the Piru Area Plan. This inconsistency would require the APCD to amend the AQMP population forecasts for the area and the Board of Supervisors would need to amend Policy 1.7.2-1. This is true of all project alternatives except the No Project alternative.

Development of the Rieder project as proposed would result in potentially significant historical resource impacts associated with the destruction of the Maltby house and associated heritage trees. As discussed in the Historical Resources chapter, this impact could be mitigated by requiring that the Maltby house be preserved and requiring that healthy mature trees be incorporated into a revised site plan. This mitigation may result in the loss of several proposed dwelling units.

This alternative would be expected to generate 352 vehicle trips per day or about 10.3% of the traffic generated by the applicant-proposed development of the Piru Expansion Area. Although this alternative would not be expected to result in any significant traffic impacts by itself, it would contribute to a cumulative reduction of level of service at several intersections under P.M. peak hour (Center Street & Orchard Street, SR 126 & Center Street and SR 126 & Pacific Avenue). The Intersection of SR 126 and Pacific Avenue would decline to LOS E, under cumulative buildout (without the proposed project), which exceeds the County's LOS standard.

The project would generate an estimated 32 elementary students. As Piru School has an estimated excess capacity that can accommodate 73 students, this alternative would not have a significant impact on Piru School. However, cumulative development is expected to generate up to ~~256~~ 452 students which would require the School District to consider reducing the number of transfer students

allowed at Piru School, adjusting the attendance boundary and/or adding additional classroom facilities.

This alternative would exacerbate the existing community parkland deficiency. The development of the Rieder component alone would warrant the construction of a one-acre public park. Such a small park would have a limited utility, although one acre is sufficient to accommodate one AYSO youth soccer field. As discussed in the Recreation Chapter, parkland deficiency impacts can be mitigated by requiring the developer to identify a park site, acquire parkland, construct a park to County standards and find a source of funding for long-term maintenance. Mr. Rieder only controls the 5-acre Component A parcel. If a one-acre park were located along Main Street on the Rieder site, the one-acre park would be readily available to future residents of the Rieder project as well as Habitat for Humanity and Citrus View Tract residents. However, the loss of 20% of the land area for the Rieder project would reduce the site's development potential (by about 12 units) or would require the balance of the site to be developed at 15 dwelling units per acre rather than 12 units per acre as currently proposed. Alternatively, Mr. Rieder could purchase a one-acre site elsewhere within the community. There are more than 37 acres of vacant residential designated land within Piru that would allow development of a park.

As discussed in the Flooding, Erosion and Drainage Facilities chapter, the Rieder component proposes to utilize dual-purpose recreation area/flood control detention basins. Such basins potentially could have safety impacts during and immediately after a storm event and potentially could expose people to health risks. Mitigation Measure FC-2 would reduce these potential impacts to less-than significant levels.

Community character impacts would occur as a result of placement of a four-plex on Main Street, which may be perceived to be excessively bulky, compared to adjacent single-family developments in the Habitat for Humanity and Citrus View tracts. Additionally, the lack of a front yard setback and the use of a front wall along Main Street would result in community character impacts and would be inconsistent with development elsewhere in the Piru Community. As discussed in the Community Character chapter, these impacts can be reduced or avoided by redesigning the front portion of the project, limiting residential buildings along Main Street to single-family (or duplex units designed to look like single-family units), by eliminating the front wall and by providing an adequate front setback. These design changes may result in a modest reduction in the number of dwelling units within the Reider component.

The mitigation measures identified in this EIR assume development of the entire Piru Expansion Area. If only the Rieder project were approved, some of the recommended mitigation measures would not be required, while others would need to be revised.

The following measures would no longer be necessary:

AQ-2 (requires development of an enhanced Main Street);

AQ-4 (requires a TDM fee);

AR-2, AR-3, AR-4, AR-5, AR-6, AR-7 and AR-8 (agricultural/residential land use compatibility measures);

HR-3 (preservation of Finch farmworker house);

SR-1, SR-2, SR-5 (Scenic Resource policies associated with views from Highway 126);

N-4, N-6, N-7 (Highway 126 traffic noise mitigation measures);

N-9 (water pump noise);

T-4 (improved pedestrian crossing of Main Street);

T-16 (bus turnout at Via Fustero at Piru Town Center Park);

GS-1 (Gas Safety from SC Gas Company metering station);

LE/ES-1 (enhanced law enforcement services);

LE/ES-2 (emergency shelter provisions);

LE/ES-3 (emergency evacuation plan);

LE/ES-4 (additional dam failure siren);

E-1 (Piru School Master Plan study);

E-3 (enhances library services);

CC-2 (enhanced main street plan);

CC-4 (requires several different plans for houses fronting on Main Street);

CC-6 (road standards applicable to Levy property);

CC-8 (lot width standards); and

CC-10 (design standard applicable to Finch property).

Additionally, other measures would need to be revised:

T-11 (TIMF fee costs would be revised to reflect fewer improvements required and higher cost per unit due to reduced total number of dwelling units);

T-15 (Piru School circulation improvements cost per unit would be revised due to reduced number of dwelling units);

R-1 (park size would be reduced due to reduced number of dwelling units).

This alternative would avoid many of the impacts identified for the proposed project but would not support development of an enhanced Main Street entrance to the Piru Community, enhanced law enforcement or enhanced library services. Additionally, this alternative would not be consistent with the objective of providing a diversity of housing opportunities.

5.2 Design Alternatives

The following alternatives assume the entire 62-acre expansion area would be developed, but evaluates various design approaches:

5.2.1 Low Density Residential Design Alternative

This project alternative assumes that the entire Piru Expansion Area would be developed, but at a substantially lower density than that proposed by the applicants. Rather than 394 dwelling units developed at an average density of 6.3 dwelling units per acre, this alternative assumes that the Rieder component would be developed with single-family dwelling units at 5 dwelling units per acre and the balance of the Piru Expansion Area would be developed with large-lot single-family residential at a density of 1.5 dwelling units per acre. Under this alternative the Rieder site could accommodate up to 25 dwelling units and would likely be developed with a cul-de-sac similar to the adjacent Habitat for Humanity tract. The Levy, Finch and County of Ventura components would be developed with semi-rural 25,000 square foot lots and would allow development of an estimated 85 housing units. Under this alternative, the Piru Expansion Area could yield a maximum of 110 dwelling units.

Under the "Lower Density Residential" alternative, the following significant adverse impacts associated with the proposed project would be avoided or reduced:

- o Less than significant impact on ozone precursors
- o Traffic impacts would be substantially reduced compared to the proposed project
- o Less than significant impact on elementary school capacity
- o Community character impacts would be avoided

This alternative would be expected to generate an estimated population of 396 new residents.

As the entire 62-acre expansion area would be subject to development, the loss of prime agricultural soils would be the same as the proposed project.

Noise impacts from Highway 126 would be the same as the proposed project. To comply with the County noise standard the development would require substantial setbacks and/or construction of sound walls/berms which may in turn result in visual impacts.

The project would generate an estimated 61 elementary students. As Piru School has an estimated excess capacity that can accommodate 73 students, this alternative would not have a significant impact on Piru School. However, cumulative development is expected to generate up to 256 152 students which would require the School District to consider reducing the number of transfer students allowed at Piru School, adjusting the attendance boundary and/or adding additional classroom facilities.

Air quality impacts would not be expected to exceed the APCD adopted significance threshold of 25 pounds per day of ROC and NOx, therefore ozone precursor impacts would be less-than-significant.

This alternative would be expected to generate 1,053 vehicle trips per day or about 30.8% of the traffic generated by the applicant-proposed development of the Piru Expansion Area. As with the above alternative, this alternative would not be expected to result in any significant traffic impacts by itself. However, this alternative would contribute to a cumulative reduction of level of service at several intersections under P.M. peak hour (Center Street & Orchard Street, SR 126 & Center Street and SR 126 & Pacific Avenue). The Intersection of SR 126 and Pacific Avenue would decline to LOS E, under cumulative buildout, which exceeds the County's LOS standard.

This alternative would generate a need for about a two-acre park per County Park Department standards. There is sufficient room to accommodate a public park of this size on-site.

Some Piru residents have expressed the view that development in the Piru Expansion Area should be equestrian-oriented. This alternative would provide residential lots of sufficient size to accommodate horses and other domestic animal keeping.

Since there are no other horse-related facilities in the Piru Community, development of an equestrian-oriented community should require development of an equestrian center, and an equestrian pathway system.

An equestrian-oriented community can be expected to generate potentially significant dust, odors, vector control and water quality impacts (relating to surface water runoff from horse keeping areas). Healthy adult horses generate 20-25 lbs (0.8 cubic foot) of waste per day. Up to 175 lbs of waste per horse per week must be removed and properly disposed of each week to minimize fly breeding. Animal waste contains nutrient (phosphorus and nitrogen), bacteria and other pathogens. Nutrients cause excessive plant and algae growth and deprive river ecosystems of oxygen needed for life. High bacteria levels in water cause gastro intestinal disorders and other medical problems for people. Barns, corrals and other equestrian facilities should be located at least 100 feet from water courses, including the UWCD recharge basins, located east of the Piru Expansion Area. Potentially significant land use compatibility impacts may occur at the interface of the new equestrian development with the non-equestrian Habitat for Humanity subdivision. Equestrian and automobile circulation conflicts may result from the introduction of horses to the Piru Community as equestrians attempt to negotiate surface streets in an attempt to access trails located north of the community in the National Forest area.

This low density alternative would preserve a rural entrance to the Piru Community along Main Street, and would be compatible with existing large lot development within the Piru Expansion Area. Therefore this alternative may be considered to be superior to the proposed project from a community character perspective. However, this alternative would not be consistent with the objective of providing a diversity of housing opportunities. To partially address this deficiency, Janet Bergamo, President of the Piru Neighborhood Council suggests allowing duplex units along Main Street, similar to that suggested by the Mitigated Design Alternative, the Piru Charrette Vision Design Alternative and the James Finch Design Alternative discussed below.

Mr. Rieder has previously argued that single-family residential development is not financially feasible for the Rieder component. Financial proformas have not been submitted by any of the applicants. Thus, it is not possible to confirm financial feasibility (or infeasibility) of this alternative. If applicants are unable to profitably develop this (or any other alternative) the net result will be the same as the "No Project" alternative discussed above.

5.2.2 Park-Centered Design Alternative

This design alternative was put forth during the Piru Area Plan Update Committee's deliberations and assumes that the proposed dwelling units would be dispersed so as to concentrate the highest density in the vicinity of the proposed park, with lower density as distance from the park increases. A critical issue with respect to this alternative is the location of the park. Depending upon the location selected for a park, the land use pattern would consist of concentric rings of varying intensity of development, the highest density residential (multi-family residential) located closest to the park and the lowest density development (large-lot single-family residential) located at the greatest distance from the park site. For purposes of analysis, it is assumed that the community park would be located on Main Street just south of the Fillmore-Piru Citrus Association Packing Plant, within the Finch component. ~~It is noted that with the park located as indicated, the Rieder project would be designated for single-family development, while the Finch and Levy properties would be designated for a mix of residential densities.~~

It is assumed that the entire 62-acre expansion area would be developed with the same total number of dwelling units as under the proposed project. Therefore, environmental impacts and recommended mitigation for this alternative would be essentially the same as for the applicant-proposed development. The primary difference would be the organization of the residential land uses.

Noise impacts from Highway 126 would be the same as the proposed project. To comply with the County noise standard the development would require substantial setbacks and/or construction of sound walls/berms which may in turn result in visual impacts.

The intent of this alternative is to provide maximum access to parkland to higher density housing homes which normally have the least amount of private recreation space available to residents, while traditional single-family residential and large-lot rural single-family units have private recreation space in their back yards. To a degree this concept is also incorporated into the "Mitigated" community design concept discussed above.

This alternative is consistent with all of the project objectives.

~~This alternative is rejected as it does not reduce or avoid any of the significant environmental impacts associated with the applicant-proposed project, although the concept of providing higher density development near recreational parkland has merit from a social design perspective.~~ Elements of this alternative are integrated into the "Mitigated Design" and "Piru Charrette Vision Design" alternatives discussed below.

5.2.3 Dispersed Density Design Alternative

This design alternative assumes that each neighborhood unit (block) would be designed to accommodate a range of dwelling unit density and product type. The purpose of such a scheme is to encourage neighborhoods to include housing that will meet the needs of a variety of lifestyles and income and avoid monolithic neighborhoods of all the same type of residential product type.

This design alternative would be reflective of some of the existing older Piru residential areas which incorporate mixed residential products types, including single-family detached, duplexes and court style apartments. How exactly this would be achieved is left to the developers and the decision-makers, but in concept, one block might include single family product on several distinctly different lot sizes. Another block might include a mix of housing types (single-family detached homes, juxtaposed with single family zero-lot-line units or duplexes). A third block might provide for some combination of duplexes, triplexes, townhouse, apartment and condominium development. Note that under the proposed Planned Development zoning, this mix of residential product would be allowed, subject to

approval of a Planned Development permit. As a matter of fact the Rider proposed townhouse component already provides for a mix of six duplex units, four tri-plex units and nine four-plex units. If this design alternative is selected performance standards would need to be prepared that would describe how much of a mix of product type should be required within each neighborhood unit (block).

The environmental effects of this alternative would be essentially the same as the applicant-proposed project and similar mitigation measures would be recommended. However, it is noted that while mixing of housing product can provide a visual break from the monotony of too similarly styled housing and would increase the range of families which may reside in a neighborhood, random mixing of housing forms may be overdone, resulting in a crazy quilt mix of land use pattern, with no apparent form. Such development without appropriate guidelines can result in a lack of cohesiveness and community character impacts. To mitigate this it is recommended that form-based residential transects be created and adopted that would describe the form (height, bulk, setback standards etc. that would describe the form of the residential units. At minimum, a residential transect should be provided for dwelling units planned along Main Street and a separate transect should be provided for interior lots. Additional transects may be desirable along the agricultural/residential interface and perhaps for dwelling units which are adjacent to Highway 126 and fronting the park.

This alternative is consistent with all of the project objectives.

Nonetheless, this project alternative ~~is rejected as it~~ does not reduce or avoid any of the significant environmental impacts associated with the applicant-proposed project, and has the potential to result in significant community character impacts if poorly executed, although the concept of providing a mixture of housing types within residential blocks has merit from a visual and social economic perspective. Elements of this alternative are integrated into the "Mitigated Design, "Piru Charrette Vision" Design and "James Finch Design" alternatives discussed below.

5.2.4 Mitigated Design Alternative

In directing the Planning Division to evaluate the potential for urban development within the Piru Expansion Area, the Board of Supervisors expressed the intent that the Planning Division should develop a cohesive plan for this area that makes sense in relation to the existing community. The developers have not made any discernable effort to coordinate their proposed plans with each other and the proposed site plans reflect this ad hoc approach. In addition, the EIR concludes that the Reider and Levy project designs are not entirely in character with the existing community. The Planning Division evaluated several potential land use designs that seek to create a more cohesive unified approach to planning within the Piru Expansion Area.

The Planning Division prepared a "Mitigated" community design alternative, to illustrate many of the recommendations contained in various EIR chapters. This alternative also attempts to reflect the concepts of New Urbanism form-based planning, and the Planning Division's interpretation of input by the Piru Area Plan Update Committee. A concept drawing illustrating the "Mitigated" community design alternative for the Piru Expansion Area is provided in Figure 5-1. For purposes of evaluation, this alternative assumes that the Piru Expansion Area would be developed with nearly about the same overall number of dwelling units, as currently proposed, but that the units would be dispersed differently. Figure 5-1 illustrates a total of 367 dwelling units, a reduction of 7%, compared to the proposed project. However, it should be noted that the "Mitigated" community design concept can accommodate a further reduction in number of dwelling units, if determined appropriate by decision-makers.

Under the "mitigated" community design concept, the following significant adverse impacts associated with the proposed project would be avoided or reduced:

- Impacts associated with ozone precursors would be reduced, compared to the proposed project due to a 7% reduction in the number of dwelling units and a more walkable community.
- Impacts on historic resources would be reduced, compared to the proposed project.
- Exterior noise impacts from Highway 126 would be reduced to a less than significant level.

- o Traffic impacts would be reduced slightly compared to the proposed project due to a 7% reduction in the number of dwelling units and a pedestrian-friendly design.
- o Community character impacts would be substantially reduced compared to the proposed project.

The circulation scheme suggests a "grand" Main Street entrance to the Piru Community. The enhanced Main Street concept would include a landscaped center median on Main Street, just north of Highway 126 surrounded by public parkland. Main Street would be developed with wider parkways and an off-street pedestrian/bicycle pathway that would connect to existing pathways to within the community. The enhanced Main Street design includes zebra-striped crosswalks with a pedestrian-activated signal would be provided at the proposed park to facilitate safe access to the park.

Roundabouts, bulb-outs or other traffic calming techniques would be employed to slow traffic on the interior collector streets, provide some visual relief and to encourage walkable neighborhoods.

The enhanced Main Street concept incorporates a pattern of large-lot residential development fronting on Main Street, designed to create a cohesive land use pattern and reflect the perceived nature of the existing Piru Community. These lots would be developed with larger single-family dwellings or duplexes that would be designed to look like single-family dwellings. Triplex, development would be permitted on large lots facing the proposed parks. Four-plex units would be permitted on larger corner lots facing the proposed parks.

Rural large-lot development would be required along the urban/agricultural edge, protected by a vegetative buffer and an agricultural easement area, intended to address agricultural/residential interface land use conflicts. Interior lots would be allowed to develop with smaller, traditional single-family or zero-lot-line single family detached development. Average lot size of these interior lots is reflective of the Citrus View tract which has the smallest lots within the existing Piru Community, although developers would be encouraged to vary the lot size within this area to accommodate a range of single-family housing opportunities.

A system of alleyways would separate garage parking from the front of the homes and a system of interconnected class I bicycle/pedestrian pathways would connect residential areas to the highway-oriented commercial center, the proposed park and the existing school and existing commercial town center.

This alternative also illustrates the use of vegetative buffers along the edge of the development to address potential visual impacts of the new residential development.

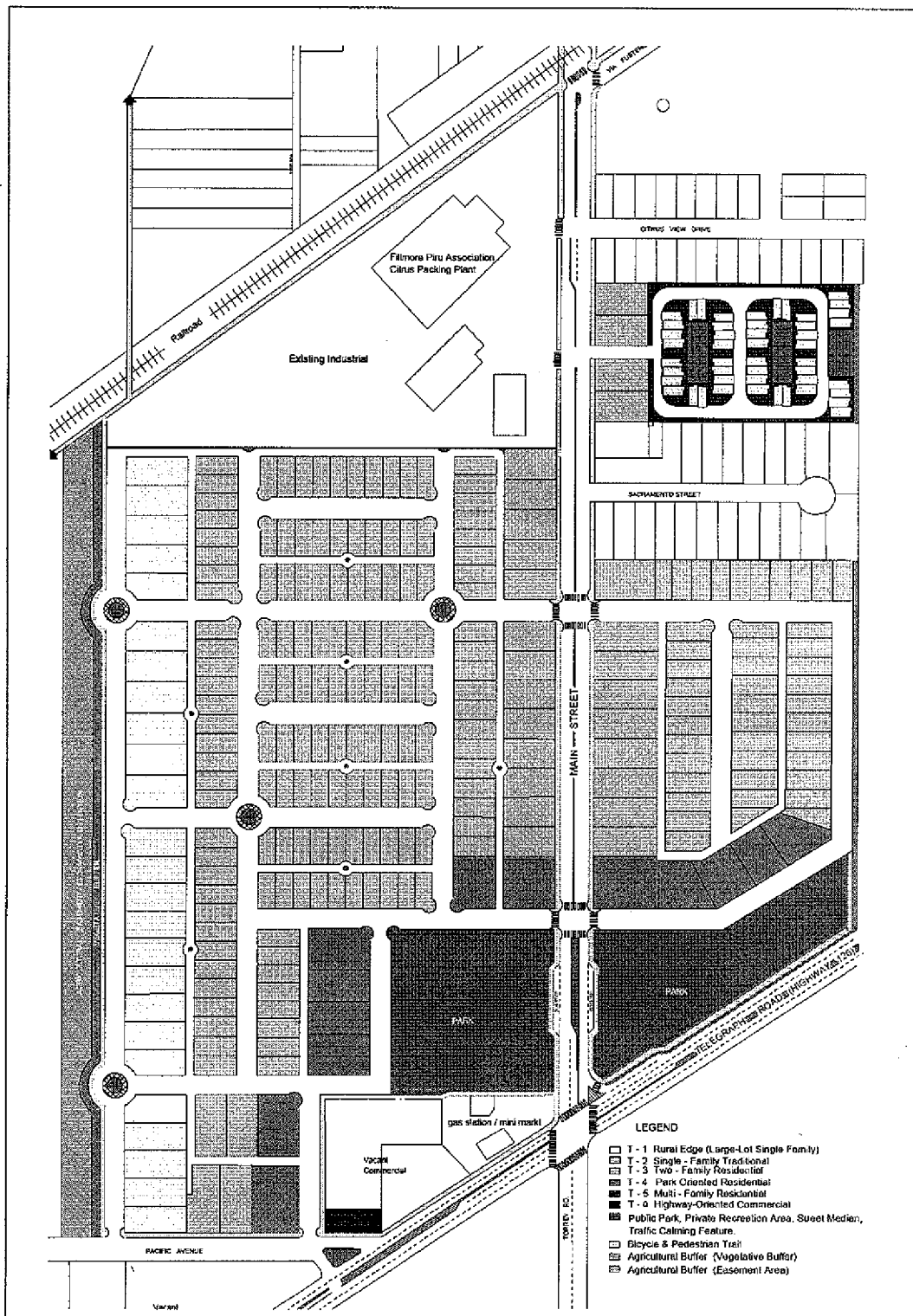
Two public parks, and a network of class I bicycle/pedestrian trails are provided to address local parkland and trail deficiencies.

Note that the location of a three-acre park on the Levy property significantly reduces the number of units that could be developed on this site, but eliminates the need for the applicant to negotiate with other property owners for a guaranteed park site as required by proposed Piru Area Plan Policy 4.7.2-5 (Appendix 8.3) and avoids the need for an oversized sound attenuating wall located on Highway 126 which would otherwise be required to address significant noise impacts from highway traffic. The placement of a park on the Levy site reduces the overall density on the Levy site from 6.3 dwelling units per acre requested to about 5 dwelling units per acre (a net loss of about 23 dwelling units).

This design alternative incorporates several potential stormwater detention basin locations, within or adjacent to the proposed parks and/or west of the Finch/Thompson properties (within the agricultural easement area).

To address traffic noise impacts from Highway 126 the "mitigated" design alternative provides for an increased setback from Highway 126 and orients proposed residential buildings facing Highway 126 so that the houses themselves act as noise attenuation to reduce noise impacts. The proposed parks could accommodate landscaped noise attenuating berms along Highway 126 that would act as both visual and acoustical barriers.

Figure 5.1 Mitigated Design Concept



Noise impacts associated with the FPCA packing plant could have a significant impact on residential units located near this industrial facility. The County's noise consultant recommends an 8 foot high noise wall along the FPCA property line (Measure N-11).

The "mitigated" design concept avoids the use of subdivision walls by facing new homes toward Main Street, consistent with the existing pattern within the older portion of the Piru Community. Subdivision walls are disliked by Piru residents as they isolate new housing from the community and can become graffiti magnets. Likewise homes along the edge of the development face outwards, in part to avoid the need for subdivision walls. However, this design feature results in single-loaded streets at the project exterior. Single-loaded streets are more costly to the developer because it reduces the number of housing units per square foot of street construction, compared to double-loaded streets.

This alternative is consistent with all of the project objectives.

As much as practical, the "Mitigated" community design concept attempts to incorporate the principals of "New Urbanism". New Urbanism is a form-based planning concept, with roots in such concepts as "Neo-traditional Planning", "Smart Growth" "Livable Communities" and other recent planning innovations which have evolved as the planning community's response to post World War II suburban sprawl. New Urbanism promotes the creation and restoration of diverse, walkable, compact, vibrant, mixed-use communities composed of the same components as conventional development, but assembled in a more integrated fashion. A new urbanism community contains housing, work places, shops, entertainment, schools, parks, and civic facilities essential to the daily lives of the residents, all within easy walking distance of each other. The principles and benefits of new urbanism are described in Appendix 8.11.

The enhanced Main Street concept and the proposed parks located near Highway 126, would provide a striking entrance to the Piru Community, and would provide a sense of cohesiveness to the proposed development along Main Street, notably lacking in the current developers' proposal. The plan would incorporate specific residential guidelines to guide development of each of the five distinct residential land use sub-areas (transects). Proposed transects for the "Mitigated" community design concept are described in Appendix 8.12.

During the Piru Community charrette (see section 5.2.5 below), this alternative received the most positive votes and received no negative votes.

Elements of this design alternative have been incorporated into the Piru Charrette Vision Design Alternative, and the James Finch Design Alternative discussed below.

5.2.5 Piru Charrette Vision Design Alternative

In May 2006, Downtown Solutions conducted a 3-day charrette in the Piru Community to elicit Piru residents ideas on the kind of development the community would like to see if development is approved for the Piru Expansion Area. A total of 63 citizens participated in the charrette. As a result of the charrette, Downtown Solutions prepared a Vision Poster (Figure 5.2) which illustrates the vision identified by the Piru residents. Additionally, Downtown Solutions prepared a Smart Growth Study, which includes a Smartcode/Zoning Code Regulating component and Design Guidelines component (See Appendix 8.14). This document is intended to provide additional guidance to planners and developers in order to achieve the objectives of the Plan.

The Piru Charrette Vision Design Alternative would provide a total of 321 dwelling units (an 18.5% reduction compared with the proposed project. This alternative would result in a wide mix of residential products including single-family equestrian estate homes on 9,000 square foot lots, traditional single-family development on lots ranging from 4,000 to 7,000 square foot, duplex homes along Main Street and multi-family cottage cluster homes located within the interior of the Rieder property (Component A) and near Highway 126 and adjacent to the existing Highway Commercial site. A small mixed use commercial/residential parcel is proposed along Main Street, adjacent to the sports park. Residential blocks are planned around centrally located small neighborhood parks with an additional sports park planned adjacent to the Fillmore Piru Citrus Association packing plant and an equestrian staging center is proposed to support the equestrian lots. The plan also features

Figure 5.2 Piru Charrette Vision Design Alternative



community garden plots to permit residents to garden at an off site location and would retain citrus orchard plantings near Highway 126 to reflect the agricultural tradition of the Piru Community. The plan also features a network of pedestrian/bicycle and equestrian pathways.

Under the Piru Charrette Vision Design Alternative, the following significant adverse impacts associated with the project would be avoided or reduced:

- Impacts associated with ozone precursors would be reduced compared to the proposed project due to an 18.5% reduction in the number of dwelling units and a pedestrian-friendly design.
- Agricultural impacts would be about 3.5% less than the proposed project
- Exterior noise impacts from Highway 126 would be reduced, compared to the proposed project due to an increased setback from the highway and construction of a sound wall.
- Traffic impacts would be reduced compared to the proposed project due to an 18.5% reduction in the number of dwelling units and a pedestrian-friendly design
- Impacts with respect to elementary school overcrowding would be reduced compared to the proposed project due to an 18.5% reduction in dwelling units
- Community character impacts would be substantially reduced compared to the proposed project.

As the entire 62-acre expansion area would be developed, Agricultural Resource impacts would be very similar to the proposed project except that the Piru Charrette Vision Design Alternative would retain approximately two acres of agricultural orchard as a visual amenity and landscaped setback from Highway 126 and proposed community gardening plots would provide a partial agricultural buffer along the western boundary of the site. The Agricultural Commissioner's Office reviewed and endorsed this concept. Normally community garden area are located in relatively obscure difficult to develop areas (such as under power lines). However, the charrette design generally places these facilities in prominent locations.

It is noted that residential lots next to agricultural fields to the west must have an agricultural buffer of at least 150 feet with a vegetative shelter-belt (Recommended mitigation measures AR-6 and AR-7).

Highway 126 traffic noise is largely addressed by a terraced, landscaped sound wall and an agricultural orchard buffer. It is unknown how high this sound wall would have to be, but since residential development is setback from Highway 126 about 175 feet further than the applicant proposed project, the sound wall for the Charrette design would likely not have to be as high as the 19 feet wall required to mitigate the developer proposed project which is much closer to Highway 126.

Scenic resource impacts from Main Street and Highway 126 would largely be reduced to less than significant levels due to landscaped setbacks from highway 126, an equestrian trail along the eastern boundary of the project (which would presumably be landscaped appropriately) and due to the relatively large lot development adjacent to the eastern boundary of the Levy (Component B) site. The project would utilize orchard plantings along Highway 126 to reflect Piru's agricultural heritage and create a visual buffer. However, a landscaped sound wall potentially could have significant visual impacts, depending upon its design and location. Downtown solutions recommended that any walls be screened by heavy landscaping to thwart potential graffiti and mitigate visual impacts.

As this alternative reduces the number of dwelling units by 18.5% compared to the applicant proposed project, population related impacts (e.g., air quality, traffic, education, etc.) would be similarly reduced.

The project would still exceed the AQMP significance thresholds for ROG and NO_x.

Traffic impacts would be reduced compared to the proposed project due to reduced number of dwelling units and emphasis on walkable neighborhood design. However, traffic impacts would still contribute to significant cumulative impacts with respect to LOS at the intersections of Pacific Avenue and Center Street at Highway 126 and vehicular and pedestrian safety at various locations within the Piru Community.

The modified grid circulation system reflects the pattern of Old Piru and short blocks. The block pattern along with a network of multi-purpose trails, would enhance neighborhood walkability.

However, the circulation plan is dependent upon a single access road connection to Pacific Avenue that would traverse the Thompson property and another access road that would extend through existing residential lots on the west side of Main Street (France/Chessani properties). These properties, while part of the Piru expansion area (Component D), are not currently proposed for development and access roads would not likely be extended through these properties in the near-term unless the County was to utilize its power of eminent domain. Lack of connection to Pacific Avenue and only a single access to Main Street in the near-term is unacceptable to the County Transportation Department. Additionally this alternative would delay an EIR recommended measure that would prohibit left turns from Pacific Avenue to Highway 126 as Pacific Avenue residents would not have an obvious way to access the Piru Community until this connection is constructed. Thus a significant adverse traffic level of service impact would remain indefinitely until such time as the Thompson property is proposed for development.

This alternative provides for a number of multi-use pathways linking neighborhoods together and connecting to the existing Piru Community. However, the design does not encourage access to existing highway commercial area at Highway 126 and Main Street. Additionally, with a multipurpose pathway planned behind the multi-family development's garages, the project may result in a defensible space safety hazard.

This alternative would be expected to generate 173 elementary students which would be less than the proposed project but would still exceed the capacity of Piru School.

Parkland/open space is distributed throughout the project area giving a feeling of openness to the project and the athletic park would help mitigate noise generated by the citrus packing plant. However, dispersing parkland in relatively small parks throughout the project area results in less flexibility for the parks department and provides a relatively small area available for sports fields.

A development of 321 dwelling units would be expected to provide 5.9 acres of parkland pursuant to the County parkland standards. This alternative would provide in excess of 7 acres of local parkland which would meet the needs of the 321 dwelling unit alternative and contribute an acre or more to the Piru Community's existing parkland deficit. However, the County is unable to require park acreage in excess of the County park standard (5 acres per 1,000 population) due to legal nexus requirements, unless the developer agrees to waive nexus by means of a development agreement.

This alternative provides a variety of housing products and density appealing to a wide range of buyers and is, thus, consistent with objectives associated with providing a diversity of housing opportunities. Duplex and parkland along Main Street would create a unifying landform feature similar to the Mitigated Design Alternative.

The Charrette design alternative proposes nine 9,000 square foot equestrian lots, an equestrian staging area and ¼ mile of equestrian trail. Several problems are associated with this component of the Charrette Design Alternative.

First, the County zoning ordinance requires a minimum of 10,000 square feet per horse. A minimum of 20,000 square foot lots would be appropriate for equestrian lots so that residents could have at least two horses. Since horses are large animals, they need to have adequate room to run around and for stabling. It would not be appropriate to reduce the animal standards of the Non-Coastal Zoning Ordinance.

Second, while the alternative proposes less than ¼ mile of equestrian trail (1,200 linear feet) there are no connecting trails. Thus, the nine horses have nowhere to go unless they travel on the bike trails or in the public streets, which would present a nuisance problem and a public safety hazard. At the Charrette, community members opposed permitting horse trails along Main Street. It is unlikely that United Water District would permit equestrian trails across the adjacent percolation basins due to water quality issues and conflicts with United's groundwater enhancement program. Thus equestrians would have to trailer their horses offsite where horse facilities are provided (e.g., Piru Canyon).

While horses are viewed as a rural element and are apparently desired by at least some members of the Piru Community, they produce significant impacts (e.g., noise, odors, dust, vector control and water quality, associated with runoff from equestrian use areas) which may be perceived less favorably by their non-horse-owning neighbors. Healthy adult horses generate 20-25 lbs (0.8 cubic foot) of waste per day. Up to 175 lbs of waste per horse per week must be removed and properly disposed of each week to minimize fly breeding. Animal waste contains nutrient (phosphorus and nitrogen), bacteria and other pathogens. Nutrients cause excessive plant and algae growth and deprive river ecosystems of oxygen needed for life. High bacteria levels in water cause gastro intestinal disorders and other medical problems for people. Barns, corrals and other equestrian facilities should be located at least 100 feet from water courses, including the UWCD recharge basins, located east of the Piru Expansion Area.

Nine substandard equestrian lots would dictate a trail system, an equestrian staging area and would require a maintenance effort that may not be supported by the 312 non-equestrian property owners within the remainder of the development area. If decision-makers determine that equestrian development is desirable for the Piru Community, the Low Density Design Alternative discussed above, or the Rancho Temescal Alternative discussed below would be better suited to accommodate equestrian development.

The Downtown Solutions prepared Smart Growth Study provides development guidelines and standards designed to assist planners and developers to implement the Piru Charrette Design Alternative. However, several aspects of this study are in conflict with recommended mitigation measures. These conflicts are identified as follows:

- a. Measure N-4 (discourages tall sound walls) – The Smart Growth Study recommends a terraced and landscaped sound wall located behind an agricultural tree orchard buffer adjacent to Highway 126. The EIR recommendation is based upon input by the Piru Area Plan Update Committee, while the participants in the Charrette indicated that a well designed terraced and landscaped sound wall would be an acceptable option.
- b. Measure CC-1 (establishes standards for large lot duplex development adjacent to Main Street) – The Smart Growth Study also recommends duplex development, but on smaller lots (7,000 square foot, vs. 10,000 square foot recommended by the EIR). The larger lots recommended by the EIR are intended to emulate the large-lot single-family development already existing along Main Street within the Piru Expansion Area.
- c. Measure CC-2 (Enhanced Main Street Concept) – The Smart Growth Study recommends an enhanced Main Street concept that is similar to the EIR version (Figures 4.16-9, 4.16-10, 4.16-11 and 4.16-12), but limits the Main Street multi-purpose trail to the west side of Main Street (rather than both sides) and bulb outs would not extend into Main Street as a design feature intended by the EIR version to slow traffic and maximize pedestrian safety. The Charrette version would also extend a landscape median along the length of Main Street, in addition to a wider median near Highway 126, while the EIR version would limit the median to the area closest to Main Street. The EIR's more limited median is based upon direction of the Piru Area Plan Update Committee and requirements of the Fire Protection District.
- d. Measure CC-6 (requires roads to comply with County Road Standards applicable to Piru) – The Smart Growth Study recommends interior roads with 32 feet of pavement within 54 feet of right-of-way. The Piru Area Plan Road Standard requires 36 feet of pavement within 56 feet of right-of-way. This recommendation for narrowed roadways is consistent with New Urbanist concepts which recommend narrower roadways to calm traffic and de-emphasize the automobile. However, this standard is not acceptable to Public Works or the Fire Protection District, which are responsible for public safety.
- e. Measure CC-7 (limits garages to no more than 33% of the front of the house) – The Smart Growth Study recommends a standard that ratio of garages to the front of the house not exceed 50%.

The Piru Charrette Vision Design Alternative meets all of the project objectives and provides a thoughtfully designed land use arrangement that seems to have engendered the support of many members of the Piru Community based upon public comments made at the Piru charrette and at a

subsequent Piru Neighborhood Council meeting. However, if this design alternative is approved, the following changes are recommended:

1. A full access road connection to Pacific Avenue would need to be provided as part of any development on the west side of Main Street.
2. East-west access roads should be relocated to take into account the existing residential properties on the west side of Main Street.
3. A development agreement will be required if park acreage exceeds the County parkland standards.
4. An ordinance amendment will be required to permit the commercial/residential mixed use development (recommended by Piru Area Plan Update Committee, Program 3.2.3-2, Appendix 8.3)
5. The multi-family area adjacent to the highway commercial site should be redesigned to encourage pedestrian access to the commercial area facilities and the multi-purpose pathway should be designed to avoid indefensible space issues associated with pathway being hidden from view behind the multi-family garages.
6. The equestrian center and equestrian designated lots should be eliminated. Note that horses on 9,000 square foot lots would require a zoning ordinance amendment.
7. Inconsistencies between the Downtown Solutions prepared Smart Growth Study and the EIR recommended mitigation measures (items a-e above) should be reconciled and the Smart Growth Study should be incorporated into the Piru Area Plan along with an additional policy requiring developers to be consistent with these requirements.

5.2.7 James Finch Design Alternative

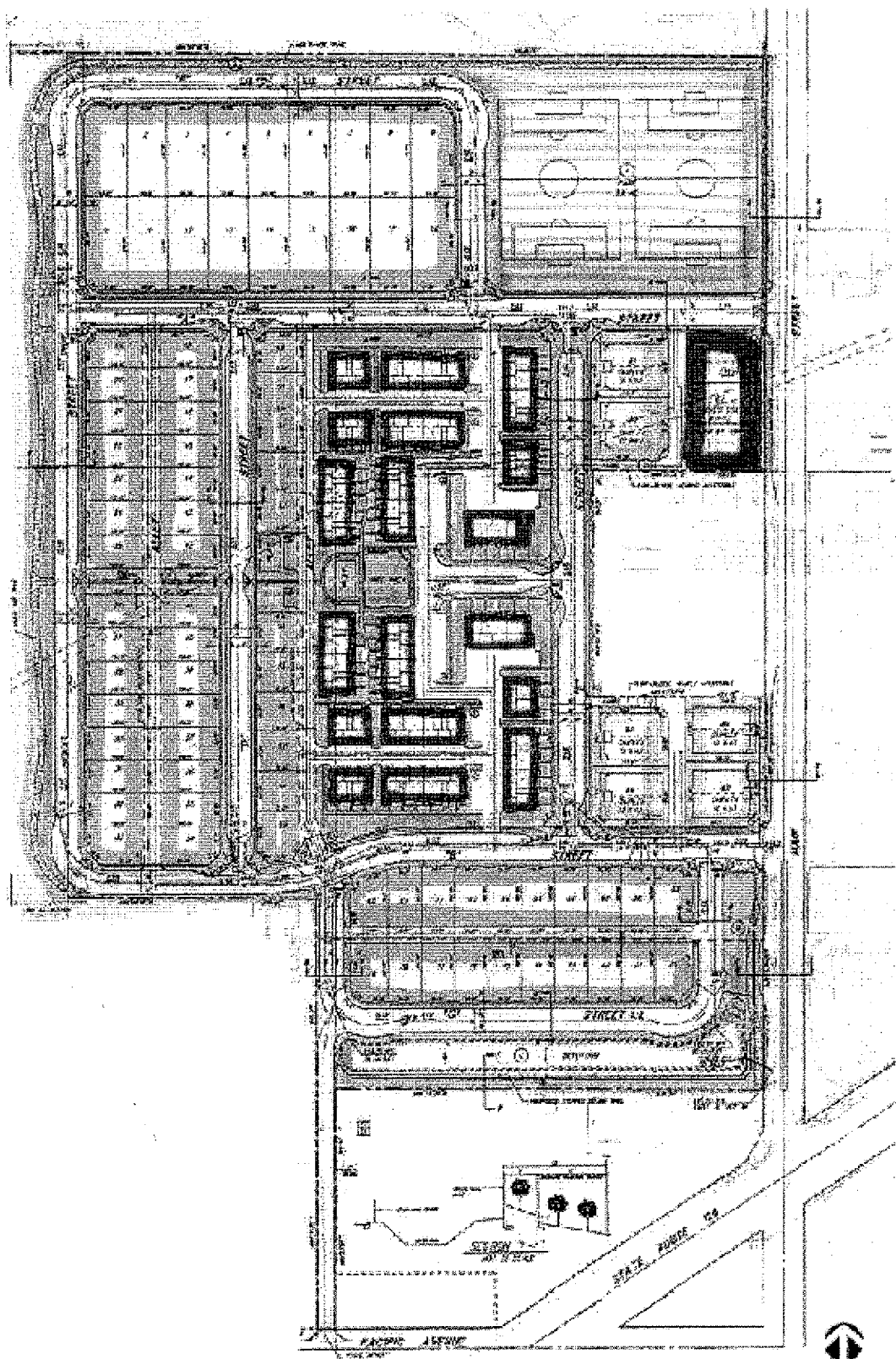
Following the Piru Community charrette, James Finch, the owner/applicant for the Component C portion of the Piru Expansion Area, submitted a concept plan for his property (Figure 5.3). Strictly speaking, this alternative is not an alternative to the proposed project, but rather a refinement of the applicant proposed project. However, Mr. Finch's design concept is addressed here because it was submitted after the Draft EIR was completed and circulated to the public. Mr. Finch's concept plan was not accompanied by a Tract Map or Planned Residential Development application.

The total number of dwelling units proposed under this alternative is 185, which is the same as originally proposed by Mr. Finch; however the mix of dwelling unit products has been altered. As indicated in the Project Description chapter, Mr. Finch originally proposed 139 single-family dwelling units (75%) and 46 multi-family units (25%). The James Finch Design Alternative proposes 79 single-family detached dwelling units (43%), and 106 attached units (57%). The attached units include 12 duplex units, 88 attached condominium units, and 6 condominium units associated with a commercial/residential mixed-use site.

The James Finch Design Alternative is centered around a 5-acre condominium complex. The condominium complex's multifamily units are organized as ten 6-plexes, two 5-plexes and six triplexes. The condominium complex is organized into long straight rows of housing units resulting in large, imposing, monolithic buildings, compared to either the Rieder project or the multi-family cottage cluster housing development proposed for the Piru Charrette Vision Design Alternative discussed above. This building form is similar to the Colina Vista apartment complex, which the Piru Neighborhood Council has indicated is not representative of the character of Old Piru (Letter from Janet Bergamo, dated April 30, 2006). Thus, the bulk/form of the condominium complex may be perceived as a significant adverse impact on community character. This impact is lessened to a degree because the complex is located 250 feet from Main Street and would be partially obscured by existing and planned residential development between Main Street and the condominium complex.

The condominium complex buildings would be two stories in height and would utilize Spanish and Italianate style architecture. While Spanish style is reflective of the Piru community's historical

Figure 5.3 James Finch Design Alternative



architectural character. Italianate architecture would introduce a new architectural style. While the proposed Piru Residential Design Guidelines encourage Craftsman, Victorian and Spanish style architecture, strictly speaking, the Guidelines do not prohibit the introduction of new architectural styles into the community. However, to ensure compatibility with community character, Mitigation Measure CC-3, requires the architectural plans must be reviewed by the Piru Neighborhood Council. Garages for the condominium complex are accessed from a rear alley and by means of an interior circulation system of private driveways. The proposed condominium complex includes a small recreation area (0.2 acres) and the density of the condominium complex is 17 dwelling units per acre. By contrast, the Rieder project proposes 12 dwelling units per acre and provides 0.4 acre of private recreation area for 60 dwelling units).

West of the condominium complex are 40 single-family detached housing units with alley access. Lot sizes for these units range from 4,350 to 5,000 square feet. A small 0.34 acre private recreation area is provided along with a landscaped multi-purpose pathway (paseo) that bisects this residential area. These units would be a mix of one story and two stories in height, and would be developed with a variety of architectural styles, including bungalow, traditional and contemporary farmhouse Craftsman, Monterey and contemporary style architecture. West of these residential units is a landscaped multipurpose pathway and a 150 foot wide agricultural buffer area, which if accompanied by a vegetative barrier would comply with the requirements of EIR recommended measures AR-6 and AR-7.

North of the condominium complex, adjacent to the FPCA packing plant and Main Street, is a 3.8-acre sports park. The park acts as a buffer between the packing plant and the proposed residential development. The park is sized to meet the County Parks Department standards for the proposed Finch dwelling units, but additional parkland would be necessary to accommodate dwelling units planned within Components A, B and D. The park as sized could accommodate two youth soccer fields or one full-size adult soccer field.

West of the proposed park are 18 larger lot (8,400 square foot parcels) that would be developed with estate single-family dwelling units. These estate lots would be developed with a mix of one and two-story units employing French Country, Spanish Colonial Revival, Monterey and Craftsman architectural styles. These estate units include three and four-car garages and generally face the public street. The garages dominate the front of the houses (the ratio of the garages to the front of the houses is up to 49% of the width of the housing unit) and would be inconsistent with proposed Piru Residential Design Guidelines and recommended Mitigation Measure CC-7 (but would be consistent with the Downtown Solutions Smart Growth Study, which recommends a maximum garage to house ratio of 50%).

East of the condominium complex would be 12 duplex units on six lots between 10,000 and 12,000 square feet. Two of the units front on Main Street. The duplex units would be two-story in height and would have rear alley access. The duplex units would utilize contemporary Spanish style architecture. The units along Main Street do not appear to be designed to look like single-family homes, but otherwise conform to EIR recommended Measure CC-1.

The balance of the Main Street frontage would be designated for commercial/residential mixed use development on a half-acre parcel. No elevations or site plans have been submitted for this parcel. This parcel would be developed with 10,800 square feet of commercial and six dwelling units. The mixed use parcel would be adjacent to the sports park and would be consistent with the Charrette Vision Design alternative, discussed above. An ordinance amendment would be required to permit this use.

South of the condominium complex would be 20 single-family detached units on 5,000 square foot lots and a 1.6-acre parcel containing a stormwater detention basin. These dwelling units would be accessed by alleys and developed similar to the previously described 60 units located west of the condominium complex.

This alternative does not identify land uses for Components A, B or D, but extrapolation of the Finch concept land use pattern would provide for about 16 duplex units on 8 lots near Main Street (Gilmore/Chessani/France properties) and about 38 single-family units for the Thompson property.

This is about the same number of dwelling units as described in the Project Description chapter for Component D.

Access would be provided by two new roads extended west from Main Street and a 24-foot wide emergency second access road extended north from Pacific Avenue, just west of the existing highway commercial parcel. The County Transportation Department has indicated a full access road should be required from Pacific Avenue.

Internal access roads include bulb-outs at most intersections and at key pedestrian crossings to calm traffic. The arrangement of blocks results in relatively long blocks (nearly 700 feet in length). Typical block size in Piru is less than 400 feet. At the Piru Charrette, community residents indicated a preference for short blocks which are more conducive to walkable communities.

A Multi-use trail is proposed around the perimeter of the property and would connect to the condominium complex by means of a landscaped paseo which extends through the single-family development to the west.

A bus turnout would be provided near the stormwater detention basin (similar to the Mitigated Design alternative).

Because the number of dwelling units remains the same as the original proposed project, population related impacts (e.g., air quality, traffic, sewage treatment, law enforcement, education and recreation impacts) would be about the same as originally proposed. Likewise since the entire site will be developed, impacts to biological resources, agricultural resources, and historical resources would also be about the same, except that with the 1.7 acre stormwater detention basin and all access roads located onsite, offsite agricultural resources would be reduced compared to the original project description, which assumed the stormwater detention facility and the western access road may be located within the agricultural buffer area.

Noise impacts from Highway 126 traffic would be mitigated by installation of a 12-foot high stepped sound wall that would be at least partially screened by a 20-foot wide sloped buffer area with orchard plantings. This is similar to the concept recommended by the Charrette Design alternative discussed above. Because the wall would exceed 6 foot in height, it would require review by the Piru Neighborhood Council pursuant to recommended mitigation measure N-4.

Although the James Finch Design alternative looks very different from the Piru Charrette Vision Design alternative, it shares a number of features. For example, both plans provide for a wide range of residential product types; both plans provide for duplexes along Main Street; both plans provide a residential/commercial mixed-use site; both plans provide for a sports park adjacent to the FPCA packing plant; and both plans incorporate a network of multi-purpose pathways designed to encourage walking and bicycling within the project and community. The primary differences between the two plans are that the Finch plan is centered around a multi-family condominium development while the Charrette design is designed around a centrally located park and in the Charrette design multi-family units are located adjacent to the existing highway commercial designated area. Additionally, the Finch plan provides for larger block size than the Charrette plan, the James Finch Design Alternative circulation and land use pattern better reflects the existing land ownership pattern west of Main Street, and the Finch plan does not include any community garden plots.

Overall, the James Finch Design alternative represents a fairly well thought out development design, which provides for a variety of housing products and incorporates pedestrian, bicycle and transit amenities, and both public and private recreation areas. If approved, it is recommended that:

1. The condominium complex should be redesigned to be more consistent with the multi-family cottage cluster housing concept embraced by the Piru Charrette Vision Design alternative discussed above. This would require smaller buildings, with greater variation in exterior walls and recesses and wall height as well as roof form and structure height to reduce the perceived scale of the buildings, and articulation of individual residential units to more closely resemble single-family residential. It is further recommended that the private recreation area within the multi-family area be expanded to at least an acre in size as public or private parkland to provide a more desirable living environment for residents of the condominium complex, and to emulate the central park

concept suggested by the Piru Charrette Vision Design alternative. These changes would reduce the number of dwelling units by 14 to 18 units and would decrease the density of the complex from 17 units per acre to about 14 units per acre.

2. A full access road should be required to connect the project to Pacific Avenue. This is required by the Transportation Department to provide improved access for residents within the development and those living on Pacific Avenue.
3. A development agreement will be required if public park acreage exceeds the County parkland standards.

Existing EIR recommended mitigation measures would require that the duplex housing units fronting on Main Street be designed to look like single-family homes (CC-1), and that the estate housing be designed to de-emphasize the multi-car garages (CC-7). This can be done by placing some of the garage units to the side or by placing them at the rear of the house. Additionally, while the project does incorporate some of the architectural styles which reflect historic Piru, the project also introduces a number of architectural styles which are not part of the historical architectural character of the Piru Community. The Piru Neighborhood Council will need to review the project architecture to determine whether the project is sufficiently in compliance with the proposed Piru Residential Design Guidelines. The PNC would also need to review the proposed sound attenuation wall concept.

5.3 Alternative Locations

The following objectives consider the environmental effects relocation of the 394 proposed dwelling units to other sites.

5.3.1 Higher Density Infill Development within the Piru Community

Instead of developing the Piru Expansion Area, this alternative assumes that the vacant parcels within the community of Piru would be re-designated by the Piru Area Plan and rezoned to accommodate the applicant proposed dwelling units. Infill development would in general result in a more compact urban form, encourage a walkable community and may reduce the cost of extending some infrastructure (sewer lines, water lines, power lines, etc.). This option would also avoid loss of prime agricultural soils and would preserve the existing rural entry to the Piru Community.

The largest infill parcel is the Rancho Camulos orchard property east of the Citrus View subdivision (about 20 acres). Development of the Camulos orchard site would need to address potentially significant flood hazard impacts.

Including the Rancho Camulos orchard property, there are approximately 37 acres of vacant undeveloped residential land within the Piru Community. This would accommodate a maximum of about 213 dwelling units at the current zoning designation (about 54% of the proposed dwelling units). In order to accommodate all of the 394 dwelling units requested, the vacant parcels would need to be rezoned and developed at an average density of 10.6 dwelling units per acre. Development at this density would likely result in significant community character impacts, particularly for the relatively rural Camulos Place subdivision (located south of Camulos Road and north of the Piru-Fillmore Citrus Association Packing Plant). If the vacant parcels within the Camulos Place subdivision were excluded from consideration, average density would need to be increased to 12 dwelling units per acre, or about the same density proposed by the Rieder component. If a new 7-acre community park site must be provided within the existing Piru Community, density of the remaining area would need to be increased to 15.3 dwelling units per acre average. Such density may be appropriate in some areas, but not all single family infill parcels could accommodate this density and still remain consistent with the character of the Piru Community.

Additionally, designating infill parcels for substantially higher density than surrounding properties may result in "spot" zoning. Spot zoning occurs when a city or county is considering the rezoning of a single lot or small parcel of property held by a single owner and the rezoning will permit land uses not available to the adjacent property. Because spot zoning often focuses on the single parcel without considering the broader context, that is, the area and land uses surrounding the parcel, it is commonly

considered the antithesis of planned zoning. The courts have found spot zoning illegal unless action is shown to be consistent with the community's land use policies. The legality often turns on public interest, the effect the spot zoning has on the current uses of neighboring properties, and any ramifications created by the zoning.

If this alternative were adopted, and the vacant infill parcels were rezoned there is no assurance that these vacant parcels would be made available for development. As the Piru Expansion Area would remain exempt from SOAR, this alternative would not assure that development of the Piru Expansion Area would not occur at a future date.

This alternative would generally be consistent with the project objectives, except that substantially higher density within existing residential blocks may not promote a cohesive plan that integrates the new development with the existing Piru Community.

Although this alternative would avoid significant impacts related to the loss of agricultural soils and would preserve the existing rural entrance to the Piru Community, the higher density required to achieve the same amount of development as the applicant proposed project would likely result in unacceptable community character impacts and may result in legal constraints with respect to spot zoning. ~~For these reasons, this alternative is rejected.~~

5.3.2 Development Along Center Street Adjacent to the Piru Community

This alternative assumes that rather than developing within the Piru Expansion Area, development would occur adjacent but outside the existing Piru Community along Center Street.

Along West Center Street there are in excess of 100 acres of relatively flat land along both sides of Center Street between Warring Wash and Piru Cemetery and south to Camulos Road. Much of this area is currently developed as a wholesale nursery and single family residence. The nursery is currently undergoing expansion. This area is of sufficient acreage to accommodate the 394 dwelling units requested at the applicant proposed density.

Along East Center Street there are 15 to 30 acres of relatively flat land including agricultural land owned by Rancho Camulos and an abandoned farmworker housing site owned by the Fillmore-Piru Citrus Packing Association. This site is under consideration for a farmworker housing complex. This location is of sufficient size to accommodate up to 189 dwelling units (less than half of the proposed 394 dwelling units at the applicant requested density). Thus this area, by itself, would not be of sufficient size to accommodate the proposed project without substantially increasing the density over that proposed by the project applicants.

This alternative would preserve the existing rural entrance to the Piru Community. Development along West Center Street would place new residents closer to the existing elementary school, would facilitate expansion of the existing school property and would allow for development of a new public park adjacent to the existing school. This alternative would also reduce agricultural/school interface land use conflicts.

The land, identified for this alternative is designated as prime agricultural soils or soils of local importance. Thus, impacts associated with the loss of important agricultural soils would be similar to the proposed project, although, potentially the acreage involved could be more than the 62-acre Piru Expansion Area.

The land identified for this alternative is located within the Fillmore-Piru Greenbelt, adopted on October 2000 as a County ordinance. The Greenbelt Agreement is an agreement between the City of Fillmore and the County Board of Supervisors to prohibit urban development or annexation of land within the greenbelt area and commits the County to maintain agricultural and open space uses within this area.

Additionally, all of this land is subject to the County SOAR Ordinance and development in any of these areas would require an affirmative vote of a majority of the Ventura County electorate. Thus, feasibility of development of these parcels cannot be known. It is noted that the Piru Expansion Area along South Main Street would still be exempt from SOAR and would remain available for conversion to

urban land uses at a future date. It is further noted that the applicants do not control any of the above identified lands, so whether they would be made available for development is unknown.

While, this project alternative would provide some environmental benefits with respect to Piru School and would preserve the rural entrance to the Piru Community, because of the Greenbelt Agreement and a requirement for a SOAR vote and the uncertainty of the landowner's support, the feasibility of this alternative is questionable. ~~For these reasons, this alternative is rejected.~~

5.3.3 Rancho Temescal

Rancho Temescal is an approximately 5,000 5,688 acre property located between Lake Piru and the existing Piru Community. ~~In August 2006, the owner of Rancho Temescal has expressed an interest in developing up to 400 10-acre parcels, submitted an application for General Plan Amendment Screening to permit development of about 1,500 acres of the Rancho Temescal property with 127 ten-acre "farms", 19 farmworker housing units, a school site and a park site (Figure 5.4).~~ The Piru Neighborhood Council has expressed interest in pursuing this project as it would attract higher income residents that are thought to benefit businesses in the Piru Community to a greater degree, compared to the workforce housing planned by the Piru Expansion Area applicants.

If the Rancho Temescal property were developed instead of the proposed Piru Expansion Area, the following significant adverse impacts associated with the project would be avoided or reduced:

- o Avoidance of potential historical resource impacts associated with the loss of the Maltby residence and Finch farmworker housing
- o Scenic resource impacts would be reduced compared to the proposed project
- o Avoidance of noise impacts associated with Highway 126 traffic
- o No need to expand sewage treatment plant (assuming use of septic systems)
- o Avoidance of gas safety impacts associated with housing adjacent to the Southern California gas metering station
- o While the traffic and air quality impacts generated per dwelling unit would be greater than the proposed project, overall traffic and air quality would be reduced if only 146 dwelling units are constructed.
- o Elementary school overcrowding may be avoided if a new school site is provided
- o Local parkland deficit may be reduced if a new park site is provided
- o Community character impacts would be avoided with rural equestrian home development.

The existing Piru Area Plan requires minimum 80-acre lot size for the agricultural and open space areas outside the Piru Community. Thus, an amendment to the Piru Area Plan would be necessary.

There are an estimated 37,483 acres of Open Space designated land within the Piru Area of Interest. Therefore, this alternative would have significant growth inducement potential to the extent that it inspires other landowners to request similar development. Approval of this alternative could set the stage for consideration of up to several thousand ten-acre lots on surrounding properties.

Development of ten-acre parcels on Open Space zoned property would not require a SOAR vote. If the Rancho Temescal development were approved instead of the proposed project, the Piru Expansion Area would remain exempt from SOAR and, due to a shortage of "Urban" designated land in Ventura County, would likely be subject to future development requests.

10-acre development would potentially involve the loss of hundreds of acres of prime, statewide important, locally important and unique farmlands.

Because of the proximity to Piru Creek and its tributaries, the project is likely to have significant biological impacts and wildlife corridor impacts.

[illegible]

Residents would have to travel longer distances by automobile to access public facilities and services, including libraries, public transit, shopping, employment and so forth. The development would consequently be expected to have greater traffic and air quality impacts per dwelling unit, compared to the applicant proposed project. However, if the current 146 dwelling unit project is approved the overall traffic and air quality impact would be reduced compared to a 394 dwelling unit proposed project.

The current concept plan indicates a new school site would be provided onsite to address overcrowding of Piru School. However, the school site proposed is problematical in that it is located within the dam inundation area for Lake Piru and Pyramid Lake. In addition, schools are regarded as an urban land use inconsistent with the Open Space designation and Non-Coastal Zoning Ordinance. Nonetheless, public school districts are not legally obligated to follow the County General Plan or Zoning Ordinance.

The current concept plan indicates a new 14.4 acre park site would be provided onsite. Because of slope issues and a proposed access road only 8 to 9 acres would be usable park land. However, 146 dwelling units would require only 2.7 acres of public parkland; thus, the proposed project would provide surplus parkland to help address Piru's local parkland deficiency. It is noted that a public park in Open Space would not permit night lighting or athletic fields.

Existing access to Rancho Temescal is via Piru Canyon Road. Piru Canyon Road is a long, narrow, winding road, subject to erosion damage and traffic safety issues. Widening of this road would be expected to involve significant grading. The current Rancho Temescal concept plan indicates that a second access road would be constructed to meet Fire Department safety requirements. The second access road connects to East Center Street and could help to relieve traffic on Piru Canyon Road and Main Street but may contribute to cumulative adverse impacts to the intersection of Center Street with Highway 126 and may require installation of a traffic signal.

Development of Rancho Temescal with 10-acre farm parcels may result in a significant impact associated with loss of groundwater from downstream aquifers (see discussion in the Groundwater Quantity and Water Supply Distribution Chapter).

In the event of overtopping or failure of Santa Felicia dam, the residents of the development would have virtually no warning and may not be able to evacuate if Piru Canyon Road and the proposed second access road is flood damaged. However, as discussed elsewhere in this EIR, catastrophic dam failure is considered to be an extremely remote possibility. However, flooding during a 100-year or greater storm event is considered much more likely and the availability of a second school located outside the 100 year flood zone provides a second emergency shelter that could be used during such flood emergencies.

Rancho Temescal is within a high fire hazard area. With limited access, residents may have difficulty evacuating Piru Canyon under emergency conditions. However, construction of a second access road would lessen this impact.

Although there may be up to 1,000 acres of relatively flat land in Piru Canyon, the current Rancho Temescal development plan attempts to concentrate building pads in relatively less steep areas of the property, much of Rancho Temescal is steeply sloped and significant grading for construction of building pads and road access would be required.

The current concept plan would provide 127 10-acre parcels and 19 farmworker housing units. This alternative would only partially be consistent with project objectives with respect to providing a diversity of housing opportunities and would only provide for about 37% of the units planned for the Piru Expansion Area. This alternative does generally address the affordable housing requirement imposed by the Board of Supervisors. Although to meet the 15 percent affordable requirement by farmworker housing alone, the number of farmworker units would need to be increased to 23 units or the number of 10-acre parcels would need to be reduced to 115. Alternatively, some of the affordable housing requirements could be met by providing affordable second dwelling units.

The Piru Neighborhood Council indicates that development of the Rancho Temescal property would provide a rural balance to the proposed Piru Expansion Area development and could be easily integrated with the existing Piru Community. Thus, community character impacts associated with the proposed project would be avoided.

~~This alternative would not be consistent with project objectives with respect to providing a diversity of housing opportunities, nor would development of the Rancho Temescal property result in a new development being integrated with the existing Piru Community only partially meet the housing objectives of the proposed project. As This alternative offers minimal benefits and much may result in greater potential impacts compared with the applicant proposed project, this alternative was rejected with respect to biological resources, agricultural resources, dam inundation failure, wildland fire hazards and growth inducement, but may be considered superior with respect to historical resources, scenic resources, noise, education, recreation and community character compared to the applicant-proposed project. If this alternative is selected by decision-makers, a detailed project EIR will be required since the site specific impacts of the Rancho Temescal project are very different than those described in this EIR.~~

5.3.4 Alternative Locations on Urban and Rural Designated Sites Elsewhere in Ventura County

An analysis of the Vacant Land Infill Study (Planning Division, 2004) indicates there is sufficient vacant unincorporated urban residential zoned land to accommodate the proposed project only in the Ahmanson Ranch and in the Lake Sherwood areas. The Ahmanson Ranch site has been acquired by the State of California and is currently being operated as a regional park. Therefore, this site is not available for development.

The Lake Sherwood area contains a number of small RPD-zoned parcels which cumulatively could accommodate the number of dwelling units planned for the Piru Expansion Area. However, these parcels have already been subdivided and are fully accounted for by the Lake Sherwood developer. No additional sub-dividable parcels exist in this area. Therefore, this area is not available to the applicants.

Rural-zoned land exists in various areas of the County that is sufficient in acreage to accommodate the proposed number of dwelling units (Bell Canyon, Camarillo, Lake Sherwood, Las Posas, Moorpark, North Half, Ojai, Simi Valley and Thousand Oaks Areas of Interest). Zoning in these areas is largely R-A (Rural Agricultural, one acre minimum lot size), R-E (Rural Exclusive, 10,000 square foot minimum), R-O (Rural Estate, 20,000 square foot minimum), C-R (Coastal Rural, one acre minimum), and C-R-E (Coastal Rural Exclusive, 20,000 square foot minimum). While the gross number of dwelling units could be accommodated, the proposed residential product type and density would not be permitted. Even if these properties were available to the applicants, development would need to be consistent with rural development standards, requiring very large parcels. Developers would need to acquire a minimum of 90 acres and up to 394 acres of land in these rural areas to develop the equivalent number of dwelling units proposed for the Piru growth area. While development at these locations would avoid many of the environmental impacts identified with the proposed project, rural development at these locations would not be consistent with the project objectives.

Rezoning of these rural lands to an urban density would require a SOAR vote, which mandates approval by a majority of the countywide electorate. Thus, feasibility of development of these parcels at urban density cannot be known. Additionally, increasing the density of these rural designated properties may result in significant impacts, including air quality, traffic, sewage treatment, water supply, education, recreation, community character and growth inducement.

~~For the reasons discussed above, development of the proposed dwelling units at alternative Urban or Rural-designated locations elsewhere in Ventura County is rejected.~~

5.4 Environmentally Superior Alternative

The Environmentally superior alternative is the "No Project" alternative. However, this alternative would not be consistent with the project objectives listed at the beginning of this chapter. If the environmentally superior alternative is the "No Project" alternative, CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among the other alternatives. Therefore, among the project alternatives that are consistent with the project objectives,

the "Mitigated Community Design Alternative" or "Piru Charrette Vision Design Alternative" (excluding the equestrian lots and center) are is the environmentally superior alternatives. Additionally, with redesign of the condominium complex and the addition of a centrally located park, the James Finch Design Alternative could also be considered an environmentally superior sub-alternative for the western portion of the Piru Expansion Area.

~~The following project alternatives were briefly considered but were rejected as politically infeasible, or because the alternative would not reduce or avoid any significant impact identified for the applicant-proposed project, or the environmental impacts of the project alternative are greater than the applicant-proposed project, and/or the alternative would not meet the project objectives.~~

6. General Plan Consistency Analysis

This chapter evaluates the Piru Area Plan Update with regard to potential inconsistencies with adopted policies not already addressed in the context of the individual environmental impact chapters.

In accordance with the County Initial Study Assessment Guidelines a project that is inconsistent with a specific environmental policy of the County General Plan is considered to have a significant environmental impact. Any project that appears to be inconsistent with an environmental goal of the General Plan must be evaluated in light of the other related goals, policies and programs of the General Plan in order to determine significance. Environmental goals and policies are defined as General Plan goals and policies that serve to protect the environment (e.g., preservation or conservation of resources, avoidance of hazards, preservation of existing land use, or preservation of adequate public facility service levels. The following analysis was prepared based upon a review of applicable Ventura County General Plan and Piru Area Plan goals, policies and programs.

6.1 Ventura County General Plan

The County General Plan was adopted by the Ventura County Board of Supervisors in May 1988. The General Plan consists of four technical appendices (Land Use, Resources, Hazards and Public Facilities/Services) and a separate policy document which contains goals, policies and programs applicable to development within unincorporated Ventura County. The County General Plan currently designates the Piru Expansion Area as "Agriculture" (40 acre minimum parcel size).

The proposed urban residential land uses are not consistent with the existing "Agriculture" designation. The proposed project would amend the General Plan designation from "Agriculture" to "Urban" on approximately 62 acres. The "Urban" designation is consistent with the requested residential land uses. Therefore, upon approval of the requested General Plan amendment, the General Plan designation inconsistency would be resolved.

The General Plan land use goals, policies and programs were reviewed for their applicability to the proposed project. In addition to the goals, policies and programs identified in the context of individual environmental impact chapters, the project was determined to be potentially inconsistent with the following policies and attendant goals:

Energy Resources

Policy 1.9.2-2 *Land use policies in area plans should be developed to promote energy conservation and should include the following:*

- (1) *The pattern of residential, commercial and industrial land use should be compact, relate to transit routes and centers and minimize vehicular travel.*
- (2) *The infill of vacant lots should be encouraged over step-out developments.*

This policy is in support of the following goals:

Goal 1.9.1-1 *Promote land use patterns which minimize energy consumption*

Goal 1.9.1-2 *Encourage the use of renewable sources of energy and energy conservation techniques in new development*

The proposed projects do not include any specific energy saving design or technology. However, the land use pattern for the Rieder and Levy components can be described as compact, and all the proposed developments are within an easy walking distance from commercial and public facilities in the existing Piru Community. The Rieder project can be described as an infill project.

Recommended air quality mitigation would require the applicants to reduce energy consumption 20% below Federal guidelines by using improved insulation, efficient heating and ventilation, skylights, or use of efficient water heaters and compact florescent light bulbs. New technology, such as solar electric generation systems must be showcased in model homes and made available as an option to buyers. ~~and each homeowner must be provided with an electric or battery-powered lawnmower and~~

edger. Additionally, the applicants are required to encourage public transportation, pedestrian and bicycle use by construction of a bus turnouts, construction of a bicycle/pedestrian pathway along Main Street, and by incorporating pedestrian-friendly street design features, such as traffic circles and bulb-outs. Therefore, with recommended mitigation, the project will be consistent with policy 1.9.2-2.

Land Use

Policy 3.2.2-1(3) *... If a suitable amount of developable land exists within an unincorporated urban center then expansion of the unincorporated urban center shall be prohibited.*

This policy is in support of the following goal:

Goal 3.2.1-1(3) *Discourage outward expansion of urban development when suitable developable areas exist with cities and unincorporated urban centers.*

Existing ~~vacant~~ undeveloped land within the Piru Community can accommodate an estimated 213 dwelling units or about 54% of the proposed 394 dwelling units. The largest ~~vacant~~ undeveloped property within the existing Piru Community is the Camulos orchard property (about 20 acres, zoned R-P-D-6u) located adjacent to Piru Creek, east of the Citrus View subdivision. The property is currently cultivated with citrus trees, is subject to flooding and the landowner has not shown any interest in selling or developing the site. While existing ~~vacant~~ undeveloped property could accommodate a portion of the proposed project, there is insufficient vacant land within the existing Piru Community to accommodate the proposed project. Therefore, the project is not inconsistent with policy 3.2.2-1(3).

Public Facilities and Services

Policy 4.1.2-1 *Discretionary development shall be conditioned to contribute land, improvements or funds toward the cost of needed public improvements and services related to the proposed development.*

Policy 4.1.2-2 *Development shall only be permitted in those locations where adequate public services are available (functional), under physical construction or will be available in the near future.*

These policies are in support of the following goal:

Goal 4.1.1-2 *Promote the cost effective operation, equitable distribution, and funding and development of public facilities and services to meet the County's existing and future needs.*

The proposed project will contribute to the cost of various public facilities and services including traffic and safety improvements to local roads and Highway 126, maintenance of landscaping in public right-of-ways, such as along an enhanced Main Street corridor, construction and maintenance of a new public park, expanded library operations, and expansion of Piru School, if required. The EIR recommends a variety of funding mechanisms, including direct developer funding, payment of prorated fees, and formation of a community services district. With mitigation as proposed, the project will be consistent with policy 4.1.2-1.

As discussed in the Sewage Treatment and Education chapters, the Piru Wastewater Treatment Plant and Piru Elementary School are currently inadequately sized to accommodate the proposed projects. However, the Public Works Agency plans to expand the treatment plant in the near future and proposed mitigation measures would prohibit construction until the treatment plant expansion is under construction. Additionally, FUSD has the option to adjust the school district's transfer policies, adjust the school boundary, transfer existing students to Fillmore schools or expand the existing school facility. Proposed mitigation recommends that the approvals not become effective until SB 50 expires (November 2006) or until the applicants enter into an agreement with the FUSD to fund a Piru School Master Plan Study and form a Mello-Roos Community Facilities District or other mechanism acceptable to the school district to finance construction of needed school facilities to the extent that FUSD developer fees are not adequate. Therefore with mitigation as proposed, the project will be consistent with General Plan Policy 4.1.2-2.

6.2 Piru Area Plan

The Piru Area Plan, adopted by the Board of Supervisors in May 1988, establishes land use designations, goals, policies and programs for the Piru Area of Interest. The Area of Interest includes the Piru Community and outlying agricultural and open space areas. The Piru Plan also designates the Piru Expansion Area as "Agriculture" (40 acre minimum lot size).

The proposed residential development is not consistent with the Agriculture land use designation. However, the applicants have requested a General Plan Amendment to change the Area Plan Land Use designation from "Agriculture" to "R-15" (Residential, 15 dwelling units per acre) for the Rieder and Levy component and "R-6" (Residential, six dwelling units per acre) for the Finch and Ventura County components. With approval of the General Plan amendments, as proposed, the inconsistency would be avoided.

The Piru Area Plan environmental goals, policies and programs were reviewed for their applicability to the proposed project. In addition to the goals, policies and programs identified in the context of individual environmental impact chapters, the project was determined to be potentially inconsistent with the following Piru Area Plan goals, policies and programs:

Energy Resources

Policy 1.6.2 New discretionary development shall be required to submit an energy conservation plan which shall demonstrate energy savings over conventional construction (e.g., by use of solar energy or other means).

This policy is in support of the following goals:

Goal 1.6.1-1 *Create a land use pattern which minimizes energy consumption.*

Goal 1.6.1-2 *Encourage the use of alternative sources of energy within new development.*

Goal 1.6.1-3 Encourage the employment of energy conservation techniques in new development.

The above policy and goals are essentially the same as General Plan policy 1.9.2-2 and goals 1.9.1-1, 1.9.1-2. (See analysis of General Plan Resource Goals, Policies and Programs above.)

Land Use

Policy 3.1.2-3 Applicants for large development projects shall submit phasing plans designed to spread development impacts over time.

Policy 3.1.2-4 Outward expansion of the Urban boundary ... shall be discouraged if suitable developable areas exist within the Piru Community.

These policies are in support of the following goals:

Goal 3.1.1-2 Provide for a slow, even growth rate in a manner consistent with the ability of service agencies to provide quality services.

Goal 3.1.1-4 Locate new development within a compact urban community and avoid encroaching on established agricultural operations.

None of the applicants has submitted plans for development that would be phased. Although this policy does not define what a large project is, in the context of a small town such as Piru, a development that would result in a 78% increase in the size of the existing Piru Community should probably be considered a large project. If the entire Piru Expansion Area were developed concurrently the project could be considered to be inconsistent with Area Plan policy 3.1.2-3 and attendant goal 3.1.1-2. However, it is noted that Mr. Finch has stated that it is likely to be several years before the Finch Component develops due to existing contractual agreements with the growers. There are no plans currently to develop the Ventura County component.

It is further noted that recent changes in State law make it very difficult to implement this policy unless the phasing is tied to a specific infrastructure deficiency. For this reason the proposed Area Plan Update would eliminate policy 3.1.2-3 and modify goal 3.1.1-2 as follows:

Ensure that Provide for a slow, even growth rate occurs in a manner consistent with the ability of service agencies to provide quality services.

If the Piru Area Plan Update is approved as proposed, the potential inconsistency would be avoided.

As discussed above in response to General Plan policy 3.2.2-1(3) and attendant goal 3.2.1-1(3), there is insufficient land within the existing Piru Community to accommodate the requested 394 units. All of the proposed projects are within an easy walking distance of commercial and public services in the existing Piru Community. Therefore the project is consistent with Area Plan policy 3.1.2-4 and attendant goal 3.1.1- 4.

Policy 3.5.2-2 Residential designations in the Piru Community shall be directed toward an approximate overall 85% single-family/15% multi-family mix based on total potential housing units.

This policy is in support of the following goal:

Goal 3.5.1-1 To promote a diversity of housing types, tenure, and price in order to provide a variety of housing options and increase housing opportunities for persons of all income levels.

As proposed, the project would provide 73% single-family units and 27% multi-family units. While the percentage of multi-family units within the project exceeds the standard established by policy 3.5.2-2, when total development of the Piru Community is considered as required by policy 3.5.2-2 (existing Piru Community, plus project, plus cumulative build-out potential of vacant parcels zoned for development) the percentage of multi-family drops to 19%. However, this percentage still slightly exceeds the 15% multi-family envisioned by this policy. Therefore the project could be considered technically inconsistent with policy 3.5.2-2, although the policy is only an approximation of percentages. One of the changes recommended by the Piru Area Plan Update Committee is that this policy be deleted. If the Board deletes this policy the potential inconsistency is resolved.

6.3 Save Our Agricultural and Open Space (SOAR) Ordinance

In ~~1968~~ 1998 Ventura County voters approved a ballot initiative which, in essence, requires an affirmative vote of the County-wide electorate prior to rezoning of land in the County unincorporated area which is currently designated Agricultural, Open Space or Rural. The SOAR ordinance has been incorporated into the County General Plan and is operative through the year 2020.

As the proposed project would change the land use designation of the Piru Expansion Area from Agriculture to Urban, a vote of the countywide electorate would normally be required. However, the one exception to the County SOAR Ordinance is the land within the Piru Expansion Area. The County SOAR ordinance specifically excludes the Piru Expansion Area *"in recognition of the urban nature of the Piru Community and to provide essential flexibility to the Board of Supervisors to address the special needs of that community"*. Therefore, re-designation of the Piru Expansion Area would not require a vote. The proposed Piru Expansion Area includes virtually all of the area exempted by SOAR, except for a half-acre located south of Highway 126 (portion of APN# 057-0-01-18).

6.4 Piru Earthquake Recovery Program Redevelopment Plan

The Northridge Earthquake of January 1994 caused extensive damage within the Piru Community. The Piru Redevelopment Plan was adopted in May 1995 to provide the necessary funds to maintain, repair, restore, demolish or replace property or facilities damaged as a result of the earthquake. The Redevelopment Plan includes the existing Piru Community and also includes the Rieder property (Component A) and the Gillmore, Chessani and France properties within Component D. The Redevelopment plan is operative through the year 2015.

The objectives of the Redevelopment Plan are to provide financial assistance to owners and tenants of residential and commercial buildings damaged by the earthquake; to restore as many existing businesses as possible; to promote private sector investment within the project area; to preserve and enhance the Piru area's employment base; to plan, design and develop areas that are damaged or

stagnant; to repair or ameliorate public infrastructure (including roads, water, sewer, storm drainage, sidewalks, parking, and other similar public improvements, facilities and utilities whose deficiencies affect the Project Area; to reflect a high level of concern for landscape, urban design and land use principals; and to replace or improve the existing Piru Community's housing supply, both inside and outside the Project Area, including opportunities for low and moderate income households.

The proposed project is not inconsistent with the above objectives and generally supports objectives related to promotion of private sector investment within the Project Area, amelioration of roads and other public infrastructure and improvement of the Piru Community's supply of housing.

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Agencies and Individuals Contacted:

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Transportation and Circulation – Dennis Hawkins, Senior Planner, Ventura County Planning Division

Agencies and Individuals Contacted:

- Butch Britt, Director. Transportation Department. Public Works Agency. County of Ventura.
- Nazir Lalani, Deputy Director. Planning and Traffic Division, Transportation Department. Public Works Agency. County of Ventura.
- Mary Travis. Ventura County Transportation Commission
- Rock Miller, Principal; Ronn Knox, Associate Transportation Planner. Katz, Okitsu & Associates

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**Groundwater Quantity and Water Supply Distribution – Chuck Anthony,
Assistant Planner, Ventura County Planning Division**

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- Dana Wisehart; Ken Turner; Pete Dal Pozzo; Murray McEachron; Mike Solomon. United Water Conservation District
- Dave Panaro. Water Resources Division, Public Works Agency, County of Ventura
- Karen Fox. Cabrillo Economic Development Corporation
- Gary Pace. Warring Water Service.
- John Rieder. Applicant.
- Roger Campbell. Consultant (for applicant Dana Levy)
- James Finch. Applicant
- Fred Thompson. Property owner of parcel within Component D

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Sewage Treatment – Dennis Hawkins, Senior Planner, Ventura County Planning Division

Agencies and Individuals Contacted:

Reddy Pakala, Manager, Mitri Muna, Marco Segui. Water and Sanitation Services Division, Public Works Agency, County of Ventura

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Utilities – Gas Safety and Telephone Service – Chuck Anthony, Assistant Planner, Ventura County Planning Division

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Will Walters. Aspen Environmental Group.

Tim Chambers. Reese-Chambers Systems Consultants, Inc.

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Law Enforcement and Emergency Services – Chuck Anthony, Assistant Planner; and Dennis Hawkins, Senior Planner, Ventura County Planning Division

Agencies and Individuals Contacted:

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Laura Hernandez, Assistant Director; Dale Carnathon, Program Administrator. Office of Emergency Services, Sheriff's Department, County of Ventura

Mike Moriarty. California Highway Patrol

Janet Bergamo, President. Piru Neighborhood Council

Tom Buske. American Red Cross of Ventura

Tricia Maier. Planning Division, Resource Management Agency, County of Ventura

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Education – Dennis Hawkins, Senior Planner, Ventura County Planning Division

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Mario Contini, Superintendent. Fillmore Unified School District

Carol Barringer, Piru School Principal; Martha Rodgers. Fillmore Unified School District
Starrett Kreissman, Director. Ventura County Library

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Recreation Facilities – Dennis Hawkins, Senior Planner, Ventura County Planning Division

Agencies and Individuals Contacted:

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Monica Nolan. County Executive Office/Piru Redevelopment Agency, County of Ventura
Heidi Henderson. Wilderness Trail Ranger, Las Padres National Forest

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Agencies and Individuals Contacted:

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