Draft Environmental Impact Report

County of Ventura • Resource Management Agency • Planning Division
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • vcrma.org/divisions/planning

American Jewish University – Camp Alonim Project

Case Number PL22-0032
State Clearinghouse No.: 2023110297

Project Location: 1101 Peppertree Lane, Brandeis, CA 93064

Project Description: The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The modified CUP would also formally authorize the water system serving the project, the Brandeis-Bardin Mutual Water Company has the necessary water capacity available to supply domestic and firefighting purposes, pursuant to Ventura County Waterworks Manual.

PREPARED FOR:
Ventura County Resource Management Agency

PREPARED BY:
CAJA Environmental Services, LLC

APPLICANT:
American Jewish University

December 2025

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I. INTRODUCTION/SUMMARY

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a summary of the American Jewish University – Camp Alonim Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section of this Draft EIR is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR.

This section also references information from the following documents, which are included as Appendices A-1 and A-2 (respectively) of this Draft EIR:

A-1 Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting, County of Ventura – Resource Management Agency, November 20, 2023.

A-2 Comments Received in Response to Notice of Preparation of an Environmental Impact Report.

1. Purpose of this Draft EIR

The purpose of this Draft EIR is to inform decision makers and the general public of the potential environmental impacts resulting from the Project and to indicate the manner in which those significant effects can be mitigated or avoided, either through mitigation measures or alternatives to the project. A detailed description of the Project is provided in Section II, Project Description, of this Draft EIR. A description of the environmental setting is provided in Section III, Environmental Setting, of this Draft EIR.

The Project would require approval of certain discretionary actions by the County and potentially by other governmental agencies. Therefore, the Project is subject to environmental review requirements under CEQA.[1] For purposes of complying with CEQA, the County of Ventura Resource Management Agency is identified as the Lead Agency for the Project.

As described in Section 15121(a) and 15362 of the Guidelines for California Environmental Quality Act (CEQA Guidelines),[2] an environmental impact report is an informational document which will inform public agency decision-makers and the public of the potentially significant

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1 Public Resources Code Sections 21000-21178.

2 California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

environmental effects of a project, identify possible ways to mitigate any significant environmental effects, and identify and evaluate a reasonable range of alternatives to the project that have the potential to reduce or avoid the project's potential significant environmental effects, while feasibly accomplishing most of the project's basic objectives. When applicable, the Draft EIR recommends feasible mitigation measures that can reduce or avoid significant environmental impacts. This Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for adequacy of an environmental impact report:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

2. Organization of this Draft EIR

The Draft EIR is organized into eight sections (plus the Appendices) as follows:

Section I. Introduction/Summary: This section provides an introduction to the environmental review process and a summary of the Project description, alternatives, environmental impact analysis contained in the Draft EIR, and mitigation measures.

Section II. Project Description: This section provides a description of the Project including location, Project characteristics, Project objectives, and required discretionary actions.

Section III. Environmental Setting: This section provides an overview of the environmental setting of the Project, including a description of existing and surrounding land uses, and a list of related projects.

Section IV. Environmental Impact Analysis: This section examines the potential environmental impacts of the Project. Separate discussions are included which address the potential environmental effects of the Project by environmental topic. Each environmental topical analysis contains a discussion of existing conditions, an assessment and discussion of the potential significance of impacts associated with the Project, mitigation measures, cumulative impacts, and the level of significance of the impact after mitigation.

Section V. Alternatives to the Project: This section includes an analysis of a range of reasonable alternatives to the Project. The alternatives selected are based on their

potential ability to feasibly attain most of the basic objectives of the Project, and their ability to avoid or substantially lessen any of the significant effects of the Project.

Section VI. Other CEQA Considerations: This section provides a summary of the significant and unavoidable impacts of the Project, an explanation of significant irreversible environmental changes, discussion of potential growth inducing effects that would be caused by the Project, and effects found not to be significant.

Section VII. Acronyms and Abbreviations: This section provides definitions for all of the acronyms and terms used in this Draft EIR.

Section VIII. Preparers of the Draft EIR: This section presents a list of County staff and consultant team members that contributed to the preparation of the Draft EIR.

Appendices: The Appendices contain all technical reports prepared for the Project as well as all correspondence with various agencies regarding the Project.

3. EIR Process

a) Notice of Preparation/Public Scoping Meeting

In compliance with Section 15082 of the CEQA Guidelines, on November 20, 2023, a Notice of Preparation (NOP) was prepared by the County of Ventura Resource Management Agency and distributed to the State Clearinghouse, Office of Planning and Research, agencies, and other interested parties. The 30-day response period (i.e., the comment period) for the NOP of the Draft EIR extended until December 20, 2023. Appendix A-1 of this Draft EIR contains a copy of the NOP.

A public scoping meeting was held via the Zoom platform on December 5, 2023, from 6:00 pm to 8:00 pm, to inform the public and interested parties about the Project and solicit comments on the scope of environmental issues, mitigation measures, and range of reasonable alternatives to be addressed in the EIR.

Appendix A-2 of this Draft EIR contains the written comments to the NOP received by the County. The following provides a list of agencies and individuals who provided written comments during the NOP comment period:

i) Agencies and Groups

1. Native American Heritage Commission
2. California Department of Transportation
3. California Department of Fish and Wildlife
4. Ventura County Air Pollution Control District

ii) Individuals

1. Gary Seaton
2. Charles Lange

b) Areas of Controversy

Comments raised in letters submitted to the County of Ventura Resource Management Agency in response to the NOP include (but are not limited to) the following:

- Air quality
- Biological resources
- Tribal cultural resources
- Transportation
- Emergency access

c) Environmental Issues to be Analyzed in the Draft EIR

Pursuant to Section 15063(a) of the CEQA Guidelines, no Initial Study was prepared because the Planning Division determined that an EIR is necessary for the Project to comply with CEQA. This EIR addresses the potential environmental impacts associated with the Project and considers the full range of environmental topics contemplated under CEQA and the CEQA Guidelines, including:

- Agricultural Resources – Soils
- Agricultural Resources – Land Use Incompatibility
- Air Quality
- Biological Resources
- Cultural Resources – Archaeological
- Cultural Resources – Historic
- Cultural Resources – Tribal
- Expansive Soils Hazards
- Fault Rupture Hazard
- Fire Hazards
- Fire Protection Services – Distance and Response
- Fire Protection Services – Personnel, Equipment, and Facilities
- Flood Control Facilities / Watercourses – Other Facilities
- Flood Control Facilities / Watercourses – Watershed Protection District
- Greenhouse Gases
- Ground Shaking Hazard
- Hazardous Materials / Waste – Materials
- Hazardous Materials / Waste – Waste
- Hydraulic Hazards – FEMA

- Hydraulic Hazards – Non-FEMA
- Landslide / Mudflow Hazard
- Law Enforcement / Emergency Services
- Liquefaction Hazards
- Noise and Vibration
- Paleontological Resources
- Public Health
- Recreation Facilities
- Scenic Resources
- Transportation and Circulation – Roads and Highways – Safety and Design of
- Private Access
- Transportation and Circulation – Roads and Highways – Safety and Design of
- Public Roads
- Transportation and Circulation – Vehicle Miles Travelled
- Utilities
- Waste Treatment and Disposal Facilities – Solid Waste Management
- Water Resources – Groundwater Quality
- Water Resources – Surface Water Quality
- Water Resources – Surface Water Quantity
- Water Supply – Fire Flow Requirements
- Water Supply – Quality
- Water Supply – Quantity
- Wildfire

d) Environmental Review Process

The Draft EIR will be available for a 45-day public review and comment period, during which the public, agencies, and other interested parties are invited to provide feedback. After completion of the 45-day review period, a Final EIR will be prepared that includes written responses to comments on the Draft EIR submitted during the review period and modifies the Draft EIR, if required. Public hearings on the Project will be held after completion of the Final EIR. The County will make the Final EIR available to agencies and the public prior to considering certification of the Final EIR. Notice of the time and location will be published prior to the public hearing date. All comments or questions about the Draft EIR should be addressed to:

Michael T. Conger, AICP, Senior Planner
Ventura County Resource Management Agency, Planning Division
800 South Victoria Avenue, L#1740, Ventura, CA 93009-1740
Email: Michael.Conger@venturacounty.gov

4. Summary of the Project

The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of an existing organizational camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project.

5. Alternatives

In order to provide informed decision-making in accordance with Section 15126.6 of the CEQA Guidelines, this Draft EIR considers a range of alternatives to the Project. Section V. Alternatives to the Project, provides the analysis of each alternative. The Draft EIR analyzes the following alternatives to the Project:

Alternative 1: No Project Alternative

Alternative 2: Reduced Density Alternative

Alternative 3: Reduced Intensity Alternative

6. Summary Table of Environmental Impacts and Mitigation Measures

Table I-1 summarizes the environmental impacts of the Project evaluated in this Draft EIR and mitigation measures identified to reduce any identified significant Project impacts. Based on the analysis in Section IV (Environmental Impact Analysis) of this Draft EIR, the Project would not result in any significant unavoidable impacts.

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
IV.B Aesthetics	Less Than Significant	None required	Less Than Significant
IV.C Agriculture Resources	Less Than Significant	None required	Less Than Significant
IV.D Air Quality	Less Than Significant	None required	Less Than Significant
IV.E Biological Resources	Potentially Significant	**MM-BIO-1 Catalina Mariposa Lily (*Calochortus catalinae*) Protection Plan** A County-approved biologist shall conduct spring botanical surveys (March-May) prior to the start of ground-disturbing activities to map the extent of above-ground plants within the Project Construction Footprint to confirm the extent of the population and flag the areas for protective fencing. The Catalina mariposa lilies exist entirely within the expanded Fuel Modification Zone. Therefore, based on the overlap of Project activities, the biologist shall create a Protection Plan to prevent Project impacts on the lilies. If impacts cannot be avoided, a restoration plan to mitigate Project impacts shall be required. The Protection Plan shall include the installation of temporary construction exclusionary protective fencing around the observed extent of aboveground lilies plus a buffer of five feet, or as otherwise appropriate as determined by the biologist, of additional potential suitable habitat. Permanent wildlife permeable fencing shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabin development, as well as short-term impacts of construction activities. Permanent fencing or barriers shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabins. To minimize impacts of required brush clearance activities, the Protection Plan shall include retaining patches of Catalina	Less Than Significant

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		mariposa lilies within a fuel mosaic zone to the maximum extent practicable while complying with applicable fire protection standards for fuel modification (refer to Mitigation Measure MM-BIO-3 [Fuel Modification Plan]). A long-term maintenance and management protocol shall also be established. The Protection Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys shall occur 3 to 7 days before clearing, grubbing, and grading activities occur. The biologist shall conduct spring surveys and record locations of specimens. Site monitoring during subsequent springs shall be necessary to determine progress of any on-site mitigation areas. **MM-BIO-2 Catalina Mariposa Lily (*Calochortus catalinae*) Restoration Plan** If permanent impacts on the Catalina mariposa lily population cannot be avoided, a Special-Status Plant Species Restoration Plan shall be required. The Restoration Plan shall be prepared by a County-approved biologist and shall include the following components: location of mitigation site; methods for site preparation and transplanting plants; and maintenance procedures related to pest control, fencing, supplemental seeding, erosion control, access control, and supplemental irrigation. The plan shall include compensation for the loss of individual plants and associated habitat through on-site mitigation and or participation in a mitigation bank. The plan shall include the required mitigation ratios, to be no less than 1:1; quantitative success criteria; and a monitoring and reporting schedule. The plan shall also include an adaptive management program and	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		contingency measures for mitigation success if transplanting and/or propagating Catalina mariposa lilies on-site proves difficult and ultimately unsuccessful. The Restoration Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys and any necessary relocation of plants or bulbs shall occur 3 to 7 days before clearing, grubbing, and grading activities occur. The biologist shall conduct spring surveys and record locations of specimens. A biological monitor shall be present when plants or bulbs are transplanted and shall map where they are relocated. Site monitoring during subsequent springs shall be necessary to determine progress of any on-site mitigation areas. **MM-BIO-3 Fuel Modification Plan** The Permittee shall use a County-approved qualified biologist or licensed landscape architect to prepare a Fuel Modification Plan for County Planning review and approval that minimizes impacts to special-status plants, animals, and/or communities and meets the Ventura County Fire Protection District's requirements to modify fuels surrounding structures. The Fuel Modification Plan shall specify the methods of modifying vegetation surrounding structures that will avoid impacts to special-status plants, animals, and/or communities (e.g., use of hand tools to prune vegetation, thinning shrubs rather than clear-cutting, avoiding rare plants, avoiding nesting birds). The Fuel Modification Plan shall include the establishment of fuel mosaic zones, where patches of Catalina mariposa lilies, native milkweed, and other important	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		native plant species can be left undisturbed during routine vegetation maintenance activities and brush clearance events. **MM-BIO-4 Monarch Butterfly Habitat Assessment, Protocol Surveys, and Take Avoidance** A County-approved biologist shall conduct a habitat assessment prior to issuance of a grading permit, and no earlier than 30 days prior to initiating ground disturbance, to determine if Project areas contain habitat suitable to support monarchs. If suitable habitat is present, the qualified biologist shall assess the presence of monarchs by conducting protocol surveys consistent with USFWS recommendations. If monarchs are documented using Project areas for foraging, roosting, and/or breeding, then in the fall/winter prior to the start of construction, a County-approved qualified biologist must survey all suitable habitat, including native milkweed plants, within 1,000 feet of the Project Construction Footprint, with the first occurring during the first half of overwintering season (October – March) and the second in second half of the season. If the results of the surveys are negative for butterflies, the Project may proceed, and the biological monitor shall continue to monitor suitable habitat during the overwintering season for aggregations of roosting butterflies. If portions of the Project Construction Footprint are found to serve as an aggregation or roosting site for monarch butterflies, then a 100-foot no activity buffer shall be placed around these areas. No work shall be conducted within the buffer unless authorized by the County and only with the presence of a County-approved qualified biologist to monitor the populations. If winter roost trees are cited	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		for removal due to safety or mortality concerns, they shall only be removed in coordination with and approval from the County. If overwintering populations are present within the Project Construction Footprint, then at the end of each overwintering season (approximately March) a report shall be prepared by the County-approved qualified biologist and submitted by the Permittee to the County detailing the monitoring activities to serve as compliance with this measure. **MM-BIO-5 Native Milkweed Planting** During the monarch habitat assessment described in Mitigation Measure MM-BIO-4, a qualified biologist shall map and flag native milkweed plants (*Asclepias* spp.) that are likely to be removed or damaged during Project activities. Mitigation Measure MM-BIO-3 (Fuel Modification Plan) includes recommendations to leave milkweed plants undisturbed in fuel mosaic zones during vegetation maintenance activities. Where avoidance is infeasible, removed milkweed plants shall be replaced on a 1:1 basis either through transplantation of the removed plants or through installation of native milkweed container plants. Any milkweed shall be locally native, preferably the same species as those removed from the Project Site and shall be planted in similar habitat as where it was found to occur. The qualified biologist shall prepare a brief letter documenting the locations of removed milkweed plants and locations of transplantations and/or installed container plants. Identification of milkweed to be removed shall occur within 30 days of Project	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Implementation. Suitable locations for transplants and/or container plant installations shall be identified prior to milkweed removal and acquisition of container plants. The qualified biologist shall monitor the health and survival of transplanted and/or installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary. **MM-BIO-6 Prohibition on Non-Native Milkweed** No non-native milkweed or plants treated with chemical pesticides shall be installed as replacement for removed plants, nor used in any new landscaping within the Project area. To the extent feasible, landscaping within and adjacent to the Project area shall incorporate native, pesticide-free milkweed and other nectar-bearing native plants. A County-approved biologist shall monitor the health and survival of installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary. **MM-BIO-7 Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance** A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting protocol surveys consistent with the Survey Considerations for California Endangered Species Act	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Candidate Bumble Bee Species. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities. **MM-BIO-8 Nighttime Bat Surveys** A qualified bat specialist, approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45˚F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously. The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below. **MM-BIO-9 Acoustic Bat Surveys** To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats.	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate BAPP. **MM-BIO-10 Bat Avoidance and Protection Plan** If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements: • Required pre-construction surveys and monitoring • Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats) • Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal • Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		• Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats • On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat • Mitigation monitoring to evaluate the effectiveness of bat-related mitigation The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP. **MM-BIO-11 Minimization of Night Lighting for Bat Habitat** Contractors shall minimize construction night lighting on adjacent habitats. Exterior lighting within the Project Construction Footprint adjacent to bat habitat shall be the lowest illumination allowed for human safety and security and shall be selectively placed, shielded, and directed downward to the extent possible. If lighting is proposed during the construction phase, the Permittee shall submit a construction-phase lighting plan identifying the type of fixtures, lighting output, direction, shielding, and timing of operation for review and approval by the Planning Director.	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		MM-BIO-12 Nesting Bird Avoidance, Survey, and Protection Plan The Permittee shall conduct all demolition, tree removal/trimming, vegetation clearing, and grading activities (collectively, "land clearing activities"), and construction in such a way as to avoid nesting native birds. This can be accomplished by implementing one of the following options: a. Timing of land clearing or construction: Prohibit land clearing or construction activities during the breeding and nesting season (February 1 – September 15, in which case the following surveys are not required; or b. Surveys and avoidance of occupied nests: Conduct site-specific surveys prior to land clearing or construction activities during the breeding and nesting season (February 1 – September 15) and avoid occupied bird nests. A County-approved qualified biologist shall conduct surveys to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest. The County-approved qualified biologist shall conduct an initial breeding and nesting bird survey 30 days prior to the initiation of land clearing or construction activities. The County-approved qualified biologist shall continue to survey the Project Construction Footprint on a weekly basis, with the last survey completed no more than 3 days prior to the initiation of land clearing activities. The nesting bird survey must cover the	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		development footprint and 300 feet from the Project Construction Footprint. If occupied (active) nests are found, land clearing activities within a setback area surrounding the nest shall be postponed or halted. Land clearing activities may commence in the setback area when the nest is vacated (juveniles have fledged) provided that there is no evidence of a second attempt at nesting, as determined by the County-approved qualified biologist. Land clearing activities can also occur outside of the setback areas. Pursuant to the recommendations of the California Department of Fish and Wildlife, the required setback is 300 feet for most birds and 500 feet for raptors. This setback can be increased or decreased based on the recommendation of the County-approved qualified biologist and approval from the Planning Division. **MM-BIO-13 Special Status Reptile Avoidance, Protection, and Relocation Plan** A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard. At a minimum, the relocation plan shall include the following elements: • Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts • Habitat and conditions of proposed relocation sites in nearby, undisturbed areas	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		• Protocols for trapping and relocating individuals of each species • Protocols for documenting and reporting the number of individuals/species relocated If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a 1:1 ratio shall be required. Compensatory mitigation may include on and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]). The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped. During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site. A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day. The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the progress of the site towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]). **MM-BIO-14 Pre-Construction Survey and Site Clearance** A County-approved qualified biologist shall conduct a pre-construction survey one to three days before any clearing, grubbing, or grading activities occur for areas of temporary and permanent disturbance associated with the Project Construction Footprint. Grading activities shall occur no more than 3 days after site clearance occurs. If grading is discontinued for a period of	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		more than 3 days, additional pre-construction surveys shall be required prior to restarting work. Areas containing special-status species or habitat for special-status species, shall be staked and flagged off as "No Entry/No Construction" areas to be avoided until construction is completed. If special status plants cannot be avoided, they shall be transplanted and/or replaced according to Mitigation Measure MM-BIO-17 (Special-status species Avoidance and Protection Plan). If special-status animals are observed during the pre-construction survey and cannot be avoided, they shall be humanely moved off-site by a qualified (and permitted, as necessary) biologist and subsequently excluded from the project impact area following Mitigation Measure MM-BIO-17 (Special-status species Avoidance and Protection Plan). If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action. The qualified biologist shall prepare a report documenting the pre-construction survey results and site clearance activities. The original and final locations of any wildlife or plant relocations shall be recorded and mapped. The Project proponent shall ensure that pre-construction survey(s) are completed within three days prior to the start of ground-disturbing activities. The qualified biologist shall submit a pre-construction survey report to the County and CDFW and/or USFWS, as required by any regulatory permits.	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		MM-BIO-15 Biological Monitoring A County-approved qualified biologist shall be present each day during construction phase ground-disturbing activities, including vegetation removal, grubbing, and grading to the first 24 inches of soil depth, and at least weekly during other construction activities to ensure that biological avoidance and minimization measures are implemented. If special status wildlife species are observed within the work area, work shall be halted until the animal leaves the area of its own volition or is hand-captured and relocated to suitable habitat outside of the work area by a qualified biologist. If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action. The biological monitor shall prepare daily field notes of monitoring activities, which shall be summarized in a final monitoring report when construction activities have been completed at a particular site. The date and original and final locations of any wildlife relocations shall be recorded and mapped. Monitoring shall be conducted daily during initial ground-disturbing activities and on a weekly basis during all other construction activities unless greater frequency is required in a protection plan developed for special-status species, bats, or nesting birds. Daily / weekly monitoring reports shall be sent to the Planning Division. The Project proponent shall ensure that biological monitoring occurs as required by this mitigation measure, or as stipulated for the protection of special-status species, bats, and/or nesting birds, whichever is most frequent. The biological monitor shall submit daily / weekly monitoring	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		reports and a final monitoring report to the County. The County shall provide the final monitoring report to CDFW and/or USFWS, as required by any regulatory permits. **MM-BIO-16 Focused Surveys for Special Status Wildlife** Where reconnaissance-level biological surveys indicate that areas within the Project Construction Footprint encroach upon potentially suitable habitat for special-status species, a County-approved qualified biologist shall conduct focused surveys for the potentially occurring species, utilizing agency-recommended survey protocols for applicable species. The timing of surveys may be species-specific. If the presence of a special-status species is documented within the Project impact area, the Project proponent shall consult with the appropriate agency or agencies (CDFW and/or USFWS) for recommended take avoidance measures and additional permitting requirements and prepare a Special-status species Avoidance and Protection plan (refer to Mitigation Measure BMM-IO-17 [Special-status species Avoidance and Protection Plan]). While focused and protocol surveys following the CDFW and/or USFWS protocols are considered most effective for detecting the target species, they may fail to detect individuals. The Project proponent may choose to assume presence of certain species based on the presence of high-quality habitat in lieu of, or in addition to, presence/absence surveys. The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitats and individuals observed. Protocol-level surveys and resulting agency consultations shall occur prior to the approval and/or the issuance	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		of a grading permit for Project activities. The qualified biologist shall report the results of any protocol surveys to the County and appropriate regulatory agencies, following all applicable protocol standards. **MM-BIO-17 Special-status Species Avoidance and Protection Plan** If focused surveys indicate the presence of a special-status species, a County-approved qualified biologist shall notify the appropriate regulatory agencies (CDFW and/or USFWS) and prepare a Special-status species Avoidance and Protection Plan. Depending on the site and project specifications, the plan may include the following elements: • Timing considerations for temporal avoidance. • Required pre-construction surveys and construction monitoring. • Humane relocation and exclusion methods to remove and/or exclude wildlife from the Project Site. • Translocation plan and procedures for special status plants. • Protective fencing to avoid impacts to plants or wildlife habitat that shall remain on site. • Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations during construction. • On and/or off-site mitigation measures to compensate for lost or disturbed habitat.	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		• Required post-mitigation monitoring. The qualified biologist shall prepare the Special-status species Avoidance and Protection Plan, as described above, and submit it to the County and the appropriate regulatory agencies (CDFW and/or USFWS). The Special-status species Avoidance and Protection Plan shall be submitted to and approved by the County and appropriate regulatory agencies (CDFW and/or USFWS) prior to the issuance of a grading permit. The County shall review the Special-status species Avoidance and Protection Plan and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of project activities, as required. **MM-BIO-18 Contractor Education** Before conducting construction activities, all Project personnel shall participate in an educational training session conducted by a qualified biologist. The education training shall include information about relevant special-status species, their habitat, identification, conservation, and appropriate protocol if they are observed during construction. The training session shall be repeated for any new personnel joining the Project before they begin construction activities. The qualified biologist shall provide a copy of the contractor education brochure to all Project personnel and the County for their review. The biologist shall also keep a list of Project personnel who have completed the training and submit it to the County at the completion of construction. The qualified biologist shall conduct contractor education for Project personnel prior to the start of any ground-disturbing activities and	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		repeat the training, as needed, for any new Project personnel before they begin construction activities. The Planning Division shall review the copy of the contractor education brochure as well as the list of Project personnel who have completed the training and shall maintain such documents in the Project file. **MM-BIO-19 Development and Implementation of a Habitat Restoration and/or Replacement Plan** The Project proponent shall provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of riparian habitat results from the development. The restoration and/or replacement habitat shall be "in kind" (i.e., same type and acreage) and provide habitat of comparable biological value. On-site restoration and enhancement of riparian habitat adjacent to the impacted area is recommended at a 1:1 ratio, or higher ratio if required by CDFW. The Project proponent shall develop a 5-year Habitat Restoration and/or Replacement Plan in consultation with all agencies that have jurisdiction over the resource. Components of the Plan shall include but are not limited to the locations and acreages of compensatory mitigation sites, habitat restoration and enhancement activities, mitigation success criteria, and a monitoring schedule. The Permittee shall submit a Habitat Restoration and/or Replacement Plan prepared by a qualified biologist. The Habitat Restoration and/or Replacement Plan should be submitted to and approved by the County and any other agencies with jurisdiction over the resource prior to issuance of a grading permit. Monitoring of the mitigation site shall be conducted at least annually for five years following initial mitigation implementation to track progress of the site	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource. **MM-BIO-20 Best Management Practices** During construction, the Permittee shall adhere to the following BMPs: a. All food items and associated refuse shall be placed in covered containers that preclude access or use by wildlife. b. No dogs or other potentially predatory domesticated animals shall be allowed on the Project Site unless on a leash or otherwise contained at all times. c. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area. d. Feeding of wildlife by any employee or contractor of the Permittee shall be prohibited. e. Temporary signage on the Project Site to inform personnel and visitors of the above requirements. f. A County-approved qualified biologist shall confirm and photo-document the installation of the temporary signage. The Permittee shall prepare photo documentation of the complete installation of the signage and implementation of the above BMPs. Prior to the issuance of a Zoning Clearance for construction (i.e. grading or land clearing activities), the Permittee must take the following actions: 1) install signage; and 2) submit photo documentation of the signage to the Planning Division. The	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Planning Division maintains copies of the signed photo-documentation in the Project file and has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition. **MM-BIO-21 Low Impact Lighting Plan** The Permittee shall submit two copies of a lighting plan to the Planning Division for review and approval prior to implementing such plan. The lighting plan shall comply with the following: a. The lighting plan shall be prepared by an electrical engineer registered by the State of California. b. The lighting plan shall include a photometric plan and manufacturer's specifications for each exterior light fixture type (e.g., light standards, bollards, and wall mounted packs). The Permittee shall also include the lighting color and maximum lumens for each light fixture. c. The lighting plan shall provide illumination information within parking areas, pathways, streetscapes, and open spaces proposed throughout the development. d. In order to minimize light and glare on the Project Site, all light fixtures shall be high cut-off type that divert lighting downward onto the property and shall not cast light on any adjacent property or roadway, or wildlife habitat. e. The outdoor lighting shall maintain the maximum light trespass levels identified in Table 1 of NCZO Section 8109-4.7.4.	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		The Permittee shall bear the total cost of the review and approval of the lighting plan and shall install all elements of the approved lighting plan according to the approved Lighting Plan. The Permittee shall submit the lighting plan to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for construction. The Permittee shall maintain the lighting as approved in the lighting plan for the life of the permit. The Planning Division shall maintain a stamped copy of the approved lighting plan in the Project file. The Building and Safety inspector and Planning Division staff have the authority to ensure that the lighting is installed according to the approved lighting plan prior to the issuance of a Certificate of Occupancy. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition. **MM-BIO-22 Protected Tree Mitigation and Protection Plan** The Permittee shall avoid impacting protected trees to the extent feasible and shall offset or mitigate any damage to protected trees or associated impacts from such damage. If protected trees are felled/damaged and require offsets/mitigation pursuant to the County's TPR (Section 8107-25.10) and TPG (Section IV.C, Offset/Replacement Guidelines), the Permittee shall post a financial assurance to cover the costs of planting and maintaining the offset trees. To avoid impacts to protected trees to the maximum extent feasible, the Permittee shall prepare a Tree Protection Plan.	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		The TPP must include (but is not limited to): a. locations of trees to be removed; b. locations of trees to be encroached upon; c. measures (such as protective fencing) to protect all TPR-protected trees whose tree protection zones (TPZs) are within 50 feet of the Project Construction Footprint (including stockpile and storage areas, access roads, and all areas to be used for construction activities) or within 10 feet of other trees proposed for felling or removal; d. indication of which trees shall be transplanted as well as designated transplant and replacement planting locations; e. the offset or mitigation that will be provided for any trees approved for felling; and f. the offset or mitigation that will be provided should any protected trees be damaged unexpectedly. A qualified arborist shall prepare the TPP in conformance with the County's TPR, TPG, and "Content Requirements for Tree Protection Plans." If in-lieu fees will be paid to a conservation agency for tree offsets/mitigation, the Permittee shall submit to the Planning Division for review and approval, a tree mitigation plan from a conservation agency that explains how the mitigation funds will be used to support the preservation of protected trees. After the Planning Division's review and approval of the tree mitigation plan, the Permittee shall provide the Planning Division with a copy	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		of the contract between the conservation agency and the Permittee. If a financial assurance is required for tree offsets/mitigation, the Planning Division shall provide the Permittee with a "Financial Assurance Acknowledgement" form. The Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form to the Planning Division. The Permittee shall submit annual verification that any non-cash financial assurances are current and have not expired. Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the TPP to the Planning Division for review and approval, implement all prior-to-construction tree protection measures, and submit the required documentation to demonstrate that the Permittee implemented the tree protection measures. Unless otherwise approved by the Planning Director, replacement and transplant trees must be planted prior to occupancy. Other monitoring and reporting dates shall be as indicated in the approved TPP. If in lieu fees are required and will be paid to the Planning Division's Tree Impact Fund, the Permittee shall submit these fees prior to the issuance of a Zoning Clearance for construction. Where a TPP damaged tree addendum is prepared, the Permittee shall remit payment of the fees within 30 days of Planning Division's approval of the addendum. If in lieu fees are required and will be paid to an approved conservation agency, the Permittee shall submit these fees, along	

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Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		with the required tree mitigation plan and contract from the conservation organization, prior to the issuance of a Zoning Clearance for construction. If a financial assurance is required, the Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form prior to the issuance of a Zoning Clearance for construction. The Planning Division may release the financial assurance after receiving the report from the Project arborist that verifies that the replacement trees met their final 5- or 7-year performance targets set forth in the TPP. The Permittee shall retain an arborist to monitor and prepare the documentation regarding the health of the protected trees, pursuant to the monitoring and reporting requirements set forth in the "Content Requirements for Tree Protection Plans." The Planning Division maintains the approved TPP and all supporting documentation in the Project file. The Resource Management Agency Operations Division maintains copies of all financial documentation. Planning Division staff, Building and Safety Inspectors, and Public Works Agency grading inspectors have the authority to inspect the site during the construction phase of the Project, in order to verify that tree protection measures remain in place during construction activities, consistent with the requirements of Section 8114-3 of the NCZO. **MM-BIO-23 Tree Health Monitoring and Reporting** The Permittee shall submit annual monitoring reports, prepared by an arborist, after initiation of construction activities and until	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		five years after the completion of construction activities, which address the success of tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the initiation of construction activities. If any trees are found to be in serious decline (e.g., "D" status, or "C" status if pre-construction status was "A"), the arborist's report must include a Damaged Tree Addendum to the TPP which recommends offsets and any associated additional monitoring. The Permittee shall submit annual arborist reports after initiation of construction activities and until two years after the completion of construction activities. The Permittee shall implement any recommendations made by the arborist's Damaged Tree Addendum to the satisfaction of the Planning Director. The Planning Division maintains copies of all documentation and evidence that the arborist's recommendations are implemented. The Planning Division has the authority to inspect the site to confirm the health of the protected trees and to ensure that the recommendations made by the arborist are implemented consistent with the requirements of Section 8114-3 of the NCZO.	
IV.F Cultural Resources	Potentially Significant	See Mitigation Measure MM-TCR-4, below.	Less Than Significant
IV.G Energy	Less Than Significant	None required	Less Than Significant
IV.H Geology and Soils	Potentially Significant	**MM-GEO-1 Paleontological Resources** In the event paleontological resources are encountered during Project construction activities, work within 25 feet of the discovery shall should be halted, and a Qualified Professional Paleontologist, defined as one who meets the standards set forth by the Society of Vertebrate Paleontology and the *County of Ventura Initial Study Assessment Guidelines,* shall be retained to assess the discovery and make appropriate recommendations regarding handling the resources and subsequent paleontological work.	Less Than Significant

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Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
IV.I GHG Emissions	Less Than Significant	None required	Less Than Significant
IV.J Hazards and Hazardous Materials	Potentially Significant	See Mitigation Measure MM-FIRE-1, below **MM-HAZ-1 Emergency Preparedness and Procedures Plan** The camp currently maintains an Emergency Preparedness and Procedures Plan that provides procedures to be followed in the event of different types of emergencies, including a fire. Prior to expanded operations under the Project, the Applicant shall do the following: a) Coordinate with the Ventura County Fire Department to develop a Fire Protection Plan for the Project Site that substantially conforms to the Emergency Preparedness and Procedures Plan included in Appendix L-1 of this Draft EIR. The plan shall describe fire prevention measures including access and defensible space clearing requirements; potential fire scenarios; and action plans for each potential scenario which include notification, suppression, evacuation measures, and a plan for sheltering in place, in the event of a fire within the Project Site or within adjacent areas. The Applicant shall comply with all applicable elements of the fire safety plan throughout the period of site operations. b) Install and maintain emergency water distribution systems and/or other suitable fire suppression systems on the Project Site in compliance with State and County fire code.	Less Than Significant
IV.K Hydrology and Water Quality	Less Than Significant	None required	Less Than Significant
IV.L Noise	Less Than Significant	None required	Less Than Significant
IV.M Public Services (Fire and Police)	Potentially Significant	**MM-FIRE-1 Site Improvements to Mitigate Fire Risk** The Project shall incorporate the following site improvements:	Less Than Significant

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Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		• All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge. • Electric gates shall be retrofitted with an auto-exit loop sensor. • Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet). • All existing buildings shall be required to meet the following defensible space standards: ○ Zone 0 (5-foot non-combustible zone). ○ Extended fuel reduction/thinning zones to 200 feet from buildings. • The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.	
IV.N Recreation	Less Than Significant	None required	Less Than Significant
IV.O Transportation	Potentially Significant	See Mitigation Measure MM-FIRE-1, above.	Less Than Significant
IV.P Tribal Cultural Resources	Potentially Significant	**MM-TCR-1 Worker Awareness Training** Prior to initiating construction, the Project Applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and tribal representative, culturally affiliated with the Project area. The qualified archaeologist and tribal representative shall conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) for all construction personnel, to include the following: 1. Review of the type of artifacts that may be uncovered; 2. Examples of common archaeological artifacts that must be examined; 3. Review of why archaeological resources may be significant to archaeologists or Native Americans; 4. Procedures to notify interested parties in the event of a discovery, including tribal representatives culturally affiliated with the Project area;	Less Than Significant

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		5. Reporting requirements and responsibilities of the construction workers; 6. Procedures for recording, evaluating, and mitigating unanticipated discoveries; and 7. Procedures to be followed in the event of the discovery of a human burial or burial-associated artifacts. The qualified archaeologist and tribal representative shall prepare a memorandum documenting completion of the training, noting the topics covered, and providing a list of attendees, and submit it to the Planning Division. The required worker awareness training shall be completed prior to initiation of ground disturbance. The archaeologist and tribal representative shall submit their memorandum to the Planning Division within three days of completing the training. **MM-TCR-2 Monitoring During Ground Disturbance** The Project Applicant shall retain an archaeological monitor, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and Native American monitor, culturally affiliated with the Project area, to observe the first (5) days of ground-disturbing activities which include excavating, digging, and/or trenching that will result in the disturbance of terrace and alluvium/terrace deposits. Monitoring shall continue until all (5) days, consecutive or nonconsecutive, of ground-disturbing activities are completed. If no cultural resources are discovered, the archaeological monitor and Native American monitor shall submit a brief letter to the Planning Division, stating that no resources were discovered and that the monitoring activities have been completed. If cultural resources are encountered, the monitors shall have the authority to request ground disturbing activities cease within 60-feet of the discovery to assess and document potential finds in	

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Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		real time. Both the archaeological monitor and Native American monitor shall have the opportunity to assess the find. Should the find be deemed significant, the archaeological monitor and tribal monitor shall observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. The archaeological and Native American monitors shall then provide a weekly report to the Planning Division summarizing the activities during the reporting period. **MM-TCR-3 Discovery of Resources During Ground Disturbing Activities** If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Project Applicant shall: 1. Cease operations within the immediate vicinity of the find (within a 60-foot buffer) and assure the preservation of the area in which the discovery was made; 2. Notify the Planning Director in writing, within three days of the discovery; 3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, who shall assess the find and provide recommendations on the proper disposition of the site in a written report format; 4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and 5. Implement the agreed upon recommendations.	

Table I-1
Summary of Project Impacts and Mitigation Measures

Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find. If archaeological remains are encountered, the Project Applicant shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Project Applicant has implemented any recommendations made by the archaeologist's report. **MM-TCR-4 Inadvertent Discovery of Human Remains** If any human burial remains or funerary objects are encountered during ground disturbance or construction activities, the Project Applicant shall: 1. Cease operations within the immediate vicinity of the find (within a 100-foot buffer of the find) and assure the preservation of the area in which the discovery was made; 2. Immediately notify the County Coroner and the Planning Director; 3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format; • Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native	

Table I-1
Summary of Project Impacts and Mitigation Measures

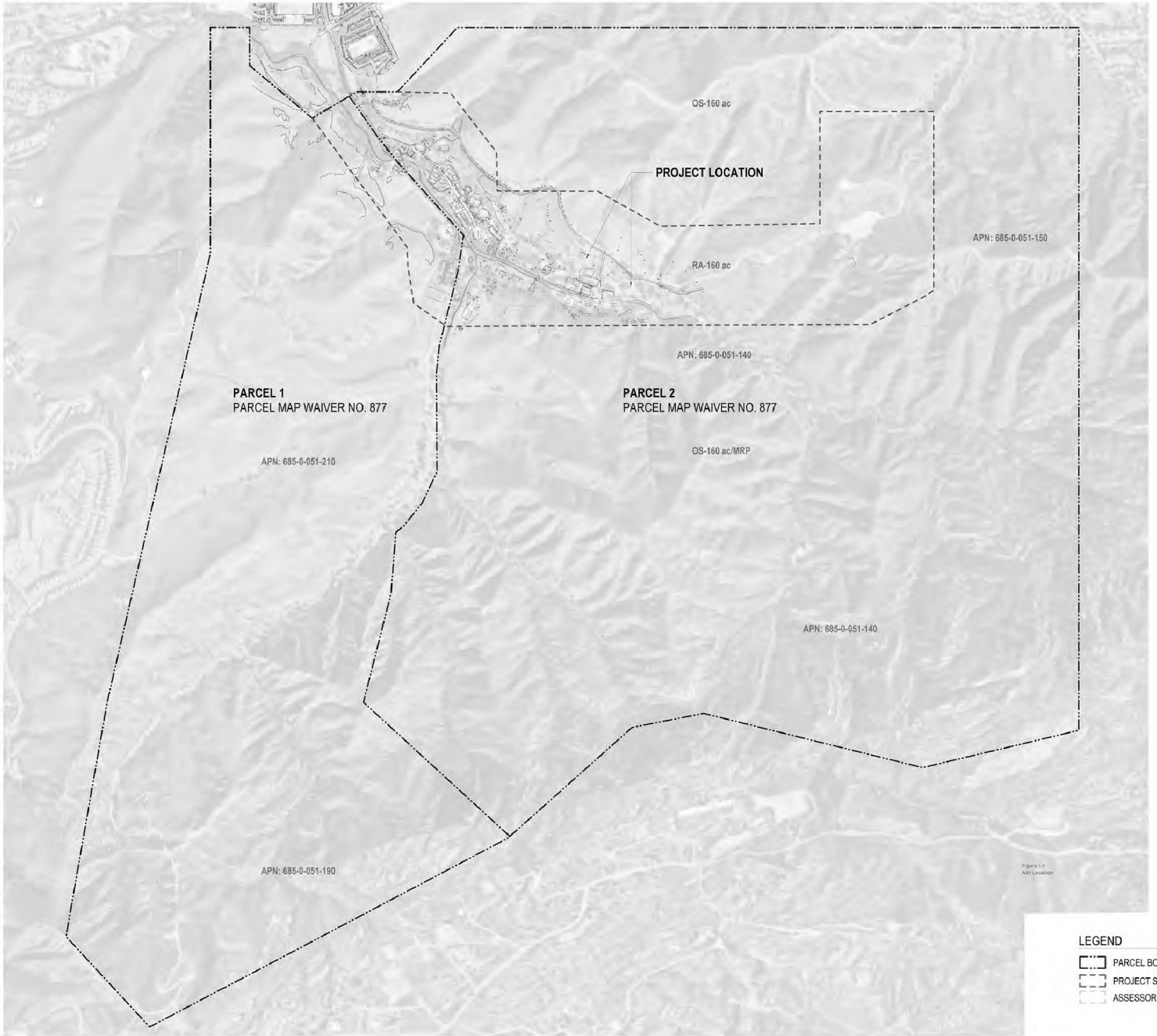
Draft EIR Section/ Environmental Topic	Impact Determination Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		American Heritage Commission (NAHC), should those findings be determined as Native American in origin. 4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and 5. Implement the agreed upon recommendations. Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find.	
IV.Q Utilities and Service Systems	Less Than Significant	None required	Less Than Significant
IV.R Wildfire	Potentially Significant	See Mitigation Measures MM-HAZ-1 and MM-FIRE-1, above. **MM-WF-1 Post-Fire Response Plan** The Permittee shall develop a post-fire response plan to ensure that people and structures on the Project Site would not be subject to post-fire landslides and/or flooding in the event that a fire occurs upslope from the cabins. The plan shall be approved by the VCFD, and shall include, but not be limited to, the following: • Appropriate drainage facilities, including a plan to determine whether they are still operable post-fire and a plan to replace any damaged drainage facilities. • Erosion and sediment control measures, such a mulch or barriers. • Plan for seeding and revegetation with native plants. • Plan for the maintenance of erosion and sediment control measures and replanted areas.	Less Than Significant

7. Project Terms

The terms shown in Table I-2 and Figures I-1 and I-2 are used in Chapter IV, Environmental impact Analysis.

Table I-2
Project Boundary Terms

Term	Meaning
Development Footprint	All areas where grading and construction activities will occur, as illustrated in Figure I-1.
Fuel Modification Zone	A zone extending 200 feet from all existing and proposed structures and 20 feet from roads and driveways.
Project	The proposal described in Section II, Project Description, of this Draft EIR.
Project Site	The boundaries of Conditional Use Permit 1776, which comprises a 328-acre portion of two underlying parcels and is coterminous with the Rural Agricultural (RA) zone boundary.
Project Construction Footprint	All areas where grading, construction, and fuel modification would occur, as illustrated in Figure I-1.
Subject Parcels	Parcels 1 and 2 of Lot Line Adjustment No. 877, which total 2,558 acres and comprise APNs 685-0-051-190 and -210 (Parcel 1) and 685-0-051-040, -050, and -140 (Parcel 2).
Survey Area	Area included within a specific technical survey, such as a biological or archaeological analysis.



Source: Abramson Architects, 2025.

Figure I-1
AJU Campus Location

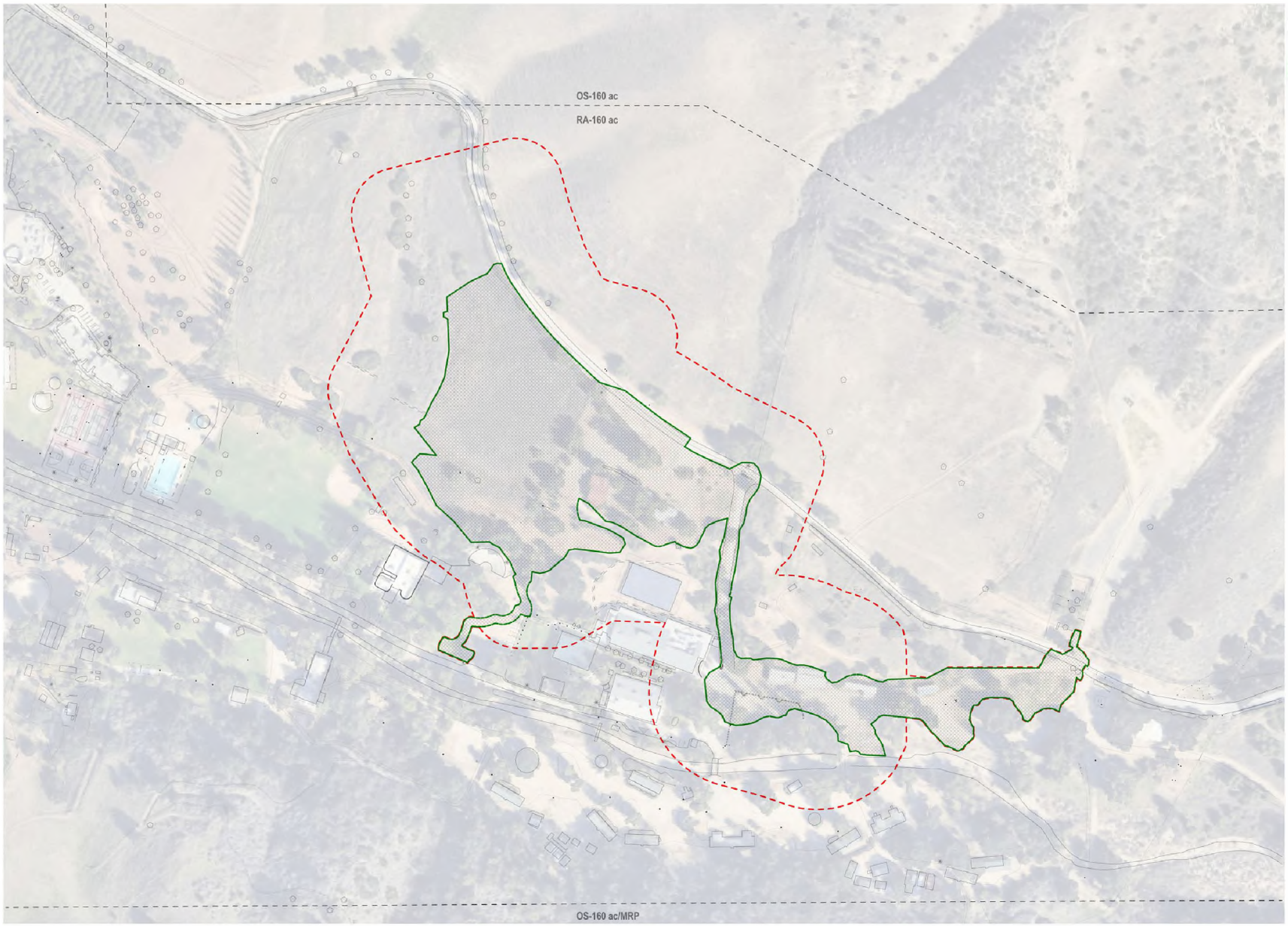


Figure I-2
Project Site

Source: Abramson Architects, 2025.

II. PROJECT DESCRIPTION

1. Project Summary

The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The modified CUP would also formally authorize the water system serving the project, the Brandeis-Bardin Mutual Water Company has the necessary water capacity available to supply domestic and firefighting purposes, pursuant to Ventura County Waterworks Manual.

2. Environmental Setting

a) Project Location

The approximately 2,558-acre Subject Parcels are located at 1101 Peppertree Lane on two legal lots known as Assessor Parcel Numbers (APNs) 685-0-051-040, -050, -140, -190, and -210. The Project Site consists of a 328-acre portion of the Subject Parcels and is situated along Meier Canyon Creek East Tributary, immediately south of the City of Simi Valley. Access is provided from the southern end of Tapo Canyon Road. Maps showing the location of the Project Site are included as Figures II-1 and II-2.

b) Background

In 1963, the Ventura County Board of Zoning Adjustment granted CUP No. 1776 (formerly termed as a “Special Use Permit”) to Brandeis Camp Institute of the West. The CUP authorized the Project Site to be used recreationally as a camp. Brandeis Camp Institute had already been operating a camp on the Site since 1947. The 1963 CUP allowed the camp to expand its operations by adding additional housing. Brandeis Camp Institute became the Brandeis-Bardin Institution, which later merged with the University of Judaism to form American Jewish University. Today, the Site is referred to as the Brandeis-Bardin Campus of American Jewish University.

The CUP had an initial term of 10 years. Several CUP Modifications and Permit Adjustments have been granted over the years to allow extension of the term and the construction of new structures. On April 27, 2015, the permit term was extended under CUP Modification No. PL13-0133, which authorizes the camp to operate until September 15, 2044. The Applicant now requests to extend the CUP for up to an unlimited term.

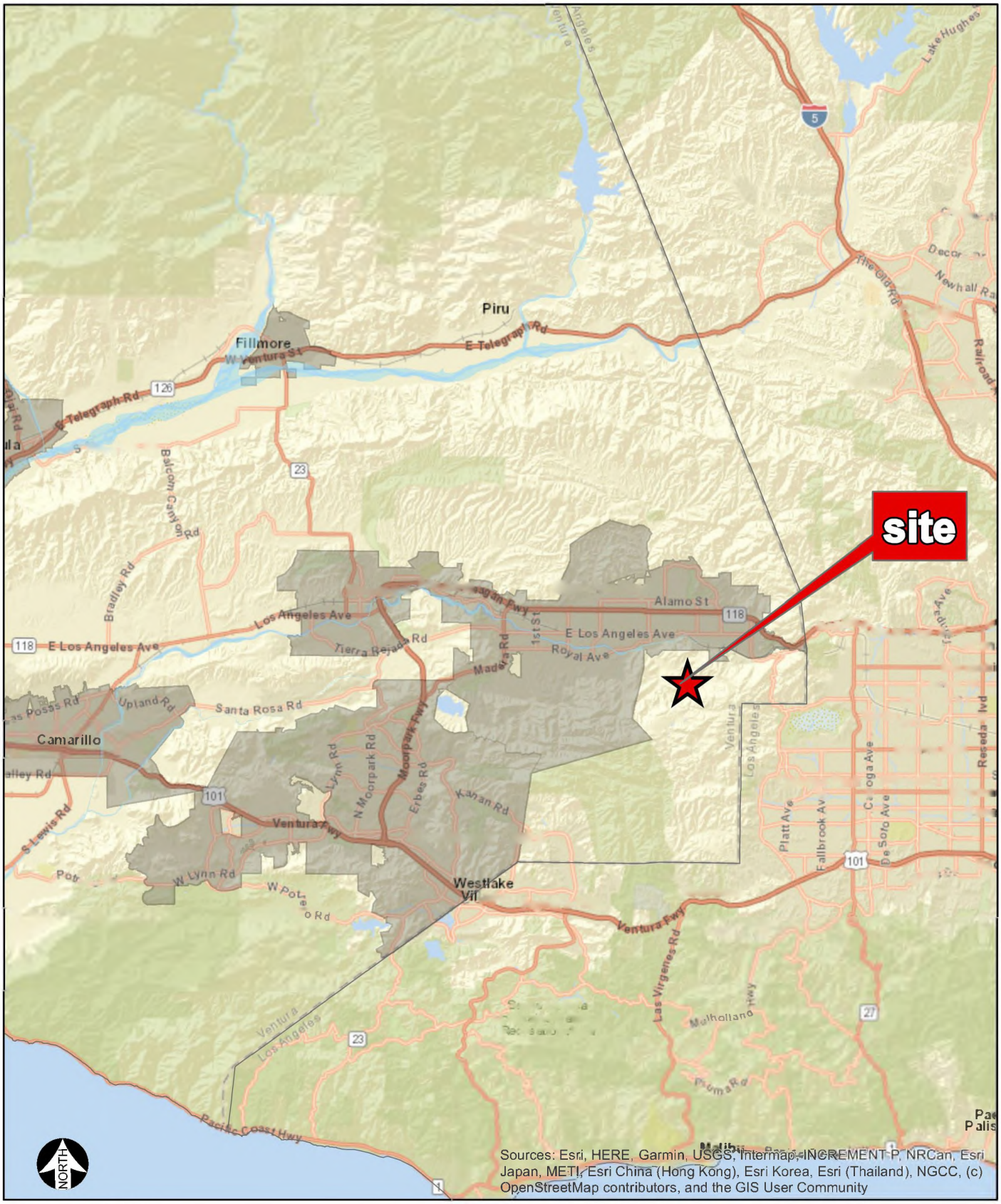
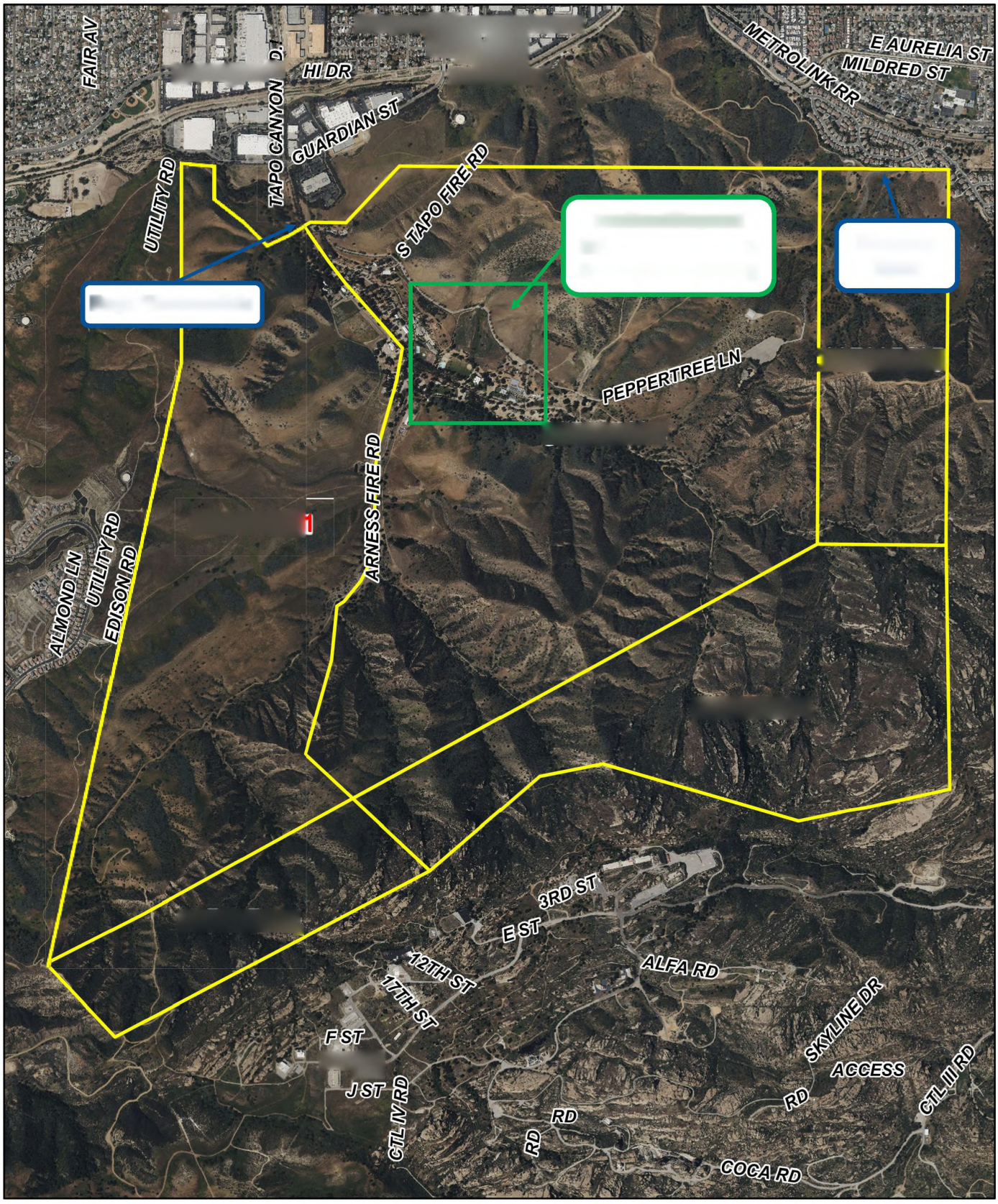


Figure II-1
Regional Location Map

Source: County of Ventura.



Project Vicinity Map

Source: County of Ventura.

c) Existing Project Site Conditions

The Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Subject Parcels. There are 117 existing structures associated with the camp, totaling approximately 208,000 sq. ft. Figures II-3 through II-6 show the locations of the existing structures. Table II-1 includes a summary of the existing structures on the Project Site and alterations to these structures as part of the Project. Structural development on the campus includes an eclectic mix of rustic cabins and modern institutional structures. While most of the buildings used for congregating, activities, and dining have been constructed since the 1980s, many of the tents, cabins, and cottages date to the 1950s, 1960s, and 1970s. A few cottages and outbuildings had been established for prior ranch use and pre-date the camp. In 1979, the Ventura County Cultural Heritage Board (CHB) designated the camp's synagogue, the House of the Book, as a cultural landmark due to its unique architecture and design by noted architect Sidney Eisenshtat. A second designated landmark on the Project Site, the Maier Ranch Main House, was demolished after it was significantly damaged in the 1994 Northridge Earthquake. In addition to the above facilities, a small cemetery with four gravesites was established on the site in the 1970s.

Vegetation at the camp consists of mustards, non-native grasses, oak woodlands, sycamore woodlands, sagebrush, and purple sage scrub. Much of the camp area has been cleared or disturbed. Meier Canyon Creek, which is part of the Arroyo Simi watershed, and the East Tributary of Meier Canyon Creek, bisect the developed portion of the camp.

d) Current Entitlement

CUP No. 1776, as modified, authorizes the following activities at the Project Site:

(1) Recreational Uses: The Project Site is home to two summer camps, the Brandeis-Collegiate Institute (BCI) and Camp Alonim. BCI hosts up to 72 college-aged adults. Camp Alonim hosts up to 400 children, ages 6-16. Camp activities occur during a 10-week period in the summer. Camp programming includes swimming, hiking, horseback riding, archery, music, dance, arts and crafts, photography, and cooking. Up to 200 staff members are authorized to support camp operations.

(2) Temporary Events: The Project Site is authorized to have up to 15 events per calendar year. Events are limited to Saturdays and Sundays between the hours of 11:00 AM and 11:00 PM. The maximum number of allowed guests is 300 per event. Typical events include weddings and bar or bat mitzvahs and are held either outdoors or indoors. Outdoor events occur at the dance pavilion, sports fields, lawns, and the patio outside of the camp's synagogue (known as the House of the Book). Indoor events are held at the two dining halls or the House of the Book.

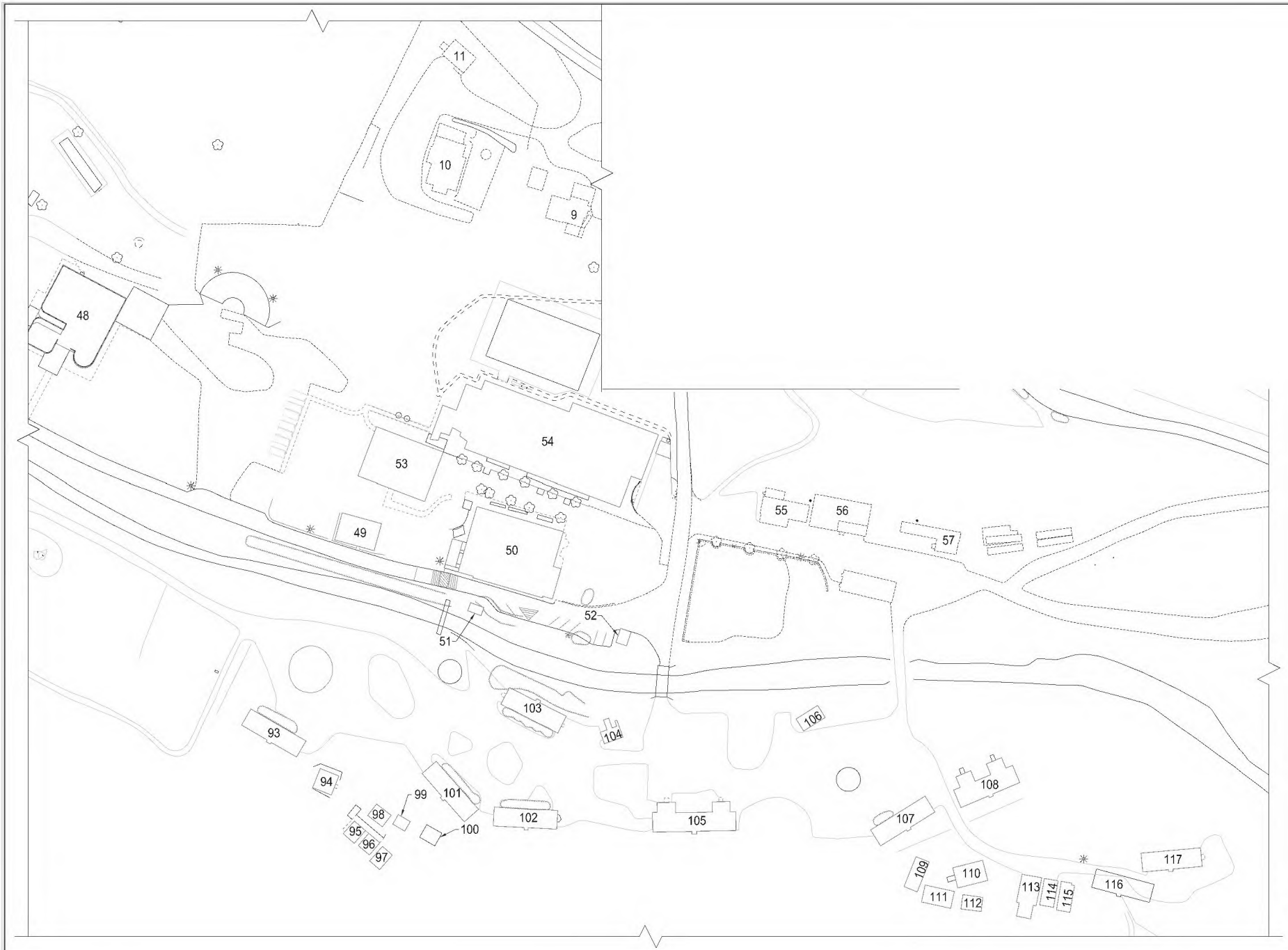


Figure II-3
Existing Structures (1 of 4)

Source: Abramson Architects, 2022.



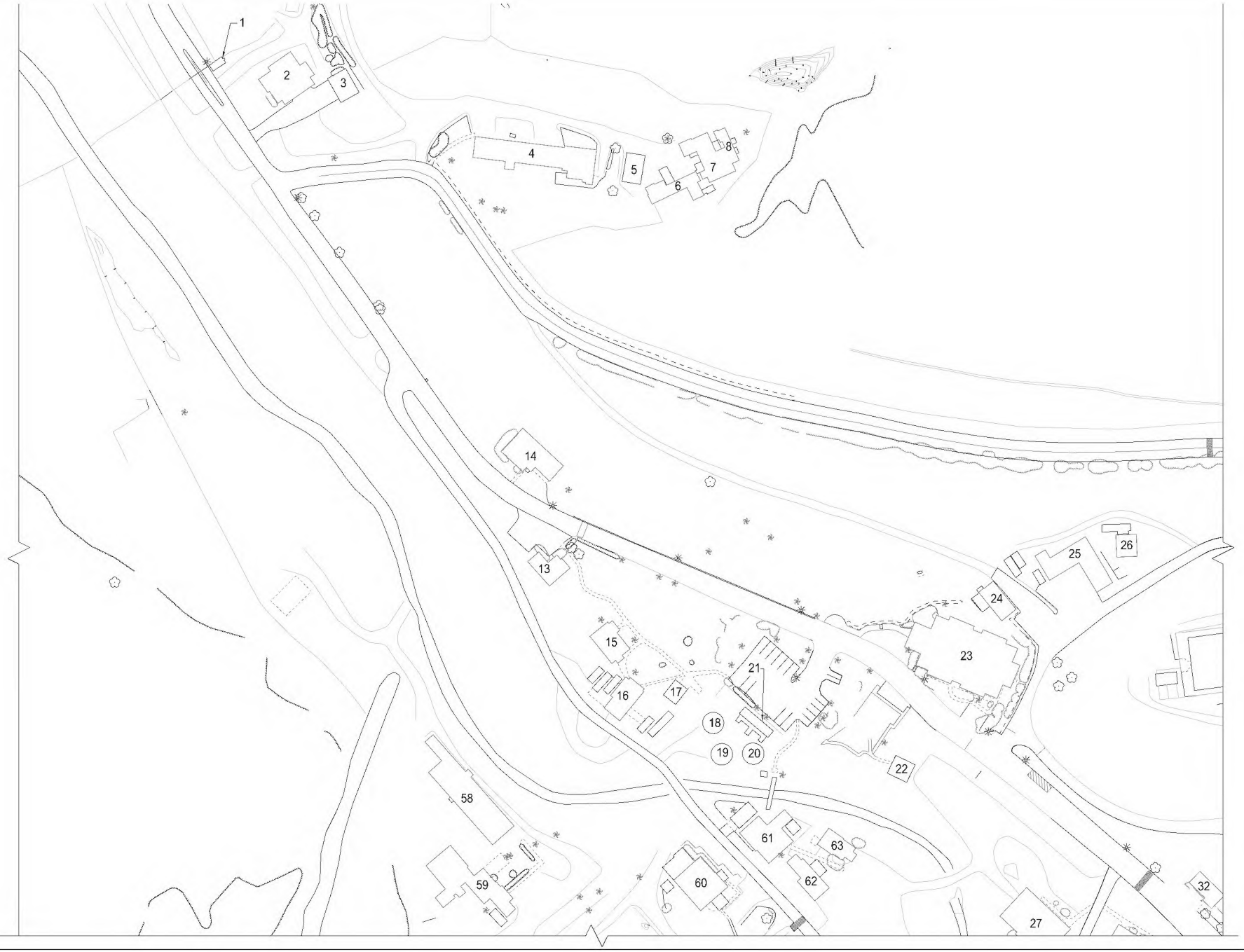
Figure II-4
Existing Structures (2 of 4)

Source: Abramson Architects, 2022.



Source: Abramson Architects, 2022.

Figure II-5
Existing Structures (3 of 4)



Source: Abramson Architects, 2022.

Figure II-6
Existing Structures (4 of 4)

Table II-1
Project Site Structures

ID	Name	Size (sq. ft.)	Proposal	Notes
1	Guard Station*	1,716	Retain	
2	Staff Housing	8,640	Retain	
3	Staff Housing	12,190	Retain	
4	Staff Housing	8,374	Retain	
5	Staff Housing	270	Retain	
6	Staff Housing	3,794	Retain	
7	Staff Housing	396	Retain	
8	Staff Housing	252	Retain	
9	Staff Housing	400	Demolish	Location of proposed cabins.
10	Staff Housing	7,600	Demolish	Location of proposed cabins.
11	Storage Garage	1,305	Demolish	Location of proposed cabins.
12	House of the Book*	7,081	Retain	
13	Cottage 12	200	Retain	
14	Staff Housing	210	Retain	
15	Cottage 13	4,661	Retain	
16	Multipurpose Space	40,500	Retain	
17	Cottage 14*	950	Retain	
18	Yurt 1*	2,242	Retain	
19	Yurt 2*	816	Retain	
20	Yurt 3*	4,080	Retain	
21	Yurt Trailer Bathroom*	1,312	Retain	
22	Cottage 15*	1,750	Retain	
23	Administration Building*	1,598	Retain	
24	Main Laundry Building*	1,040	Retain	
25	Shop Building	840	Retain	
26	Landscape Building	6,100	Retain	
27	Cottage 1	1,430	Retain	
28	Cottage 2	1,530	Retain	
29	Cottage 3*	1,008	Retain	
30	Cottage 4*	207	Retain	
31	Bunkhouse*	240	Retain	
32	Storage and Lounge	238	Retain	
33	Cottage 5	405	Retain	
34	Cottage 6	420	Retain	
35	Cottage 7	700	Retain	
36	Cottage 8	405	Retain	
37	Cottage 9*	168	Retain	
38	Dance Studio and Programming	480	Retain	
39	Child Care Center / Registration	378	Retain	
40	BCI Rec Hall and Dance Pavilion*	378	Retain	
41	Adult Activities Complex	378	Retain	
42	Adult Dining Room	378	Retain	

Table II-1
Project Site Structures

ID	Name	Size (sq. ft.)	Proposal	Notes
43	Pool Equipment	290	Retain	
44	Cottage 10/11*	1,066	Retain	
45	Alonim Pool Bathroom*	1,200	Retain	
46	Alonim Pool Boys' Changing*	300	Retain	
47	Alonim Pool Girls' Changing*	1,440	Retain	
48	Activities Building*	1,776	Retain	
49	Alonim Staff Center*	400	Retain	
50	Ulam Building and Health Center*	126	Retain	
51	Bike Storage Shed*	800	Retain	
52	Alonim Canteen*	3,584	Retain	
53	Alonim Dance Pavilion*	960	Retain	
54	Alonim Dining Hall*	3,300	Retain	
55	Housing Trailer 1*	1,224	Demolish	Location of proposed Welcome Center.
56	Housing Trailer 2*	400	Demolish	Location of proposed Welcome Center.
57	Housing Trailer 3*	255	Demolish	Location of proposed Welcome Center.
58	Staff Housing	255	Retain	
59	Staff Housing	285	Retain	
60	Staff Housing	255	Retain	
61	Staff Housing	396	Retain	
62	Staff Housing	1,224	Retain	
63	Staff Housing	1,224	Retain	
64	Silver Barn / Workshop	1,224	Retain	
65	Staff Housing	1,224	Retain	
66	Staff Housing	483	Retain	
67	CIT Bathroom A*	2,790	Retain	
68	CIT Bathroom B*	336	Retain	
69	CIT Tent Structure*	1,224	Retain	
70	CIT Tent Structure*	2,010	Retain	
71	CIT Tent Structure*	510	Retain	
72	CIT Tent Structure*	736	Retain	
73	CIT Tent Structure*	576	Retain	
74	CIT Tent Structure*	416	Retain	
75	CIT Tent Structure*	690	Retain	
76	CIT Tent Structure*	448	Retain	
77	CIT Tent Structure*	480	Retain	
78	CIT Tent Structure*	208	Retain	
79	CIT Tent Structure*	1,224	Retain	
80	CIT Tent Structure*	1,716	Retain	
81	CIT Tent Structure*	8,640	Retain	
82	CIT Tent Structure*	12,190	Retain	

Table II-1
Project Site Structures

ID	Name	Size (sq. ft.)	Proposal	Notes
83	Staff Housing	8,374	Retain	
84	Equestrian Trailer*	270	Retain	
85	Day Camp Programming*	3,794	Retain	
86	Brown Barn*	396	Retain	
87	Reptile / Fish*	252	Retain	
88	Bathrooms*	400	Retain	
89	Archery Shade Structure*	7,600	Retain	
90	Library Repository Storage	1,305	Retain	
91	Shade Structure*	7,081	Retain	
92	Recreation Hall*	200	Retain	
93	Youth Bunk House*	210	Retain	
94	Bathroom Building*	4,661	Retain	
95	Youth Tent Structure 1*	40,500	Retain	
96	Youth Tent Structure 2*	950	Retain	
97	Youth Tent Structure 3*	2,242	Retain	
98	Youth Tent Structure 4*	816	Retain	
99	Youth Tent Structure 5*	4,080	Retain	
100	Youth Tent Structure 6*	1,312	Retain	
101	Youth Bunk House*	1,750	Retain	
102	Youth Bunk House*	1,598	Retain	
103	Youth Bunk House*	1,040	Retain	
104	Youth Cottage*	840	Retain	
105	Youth Bunk House*	6,100	Retain	
106	Head Cottages*	1,430	Retain	
107	Youth Bunk House*	1,530	Retain	
108	Youth Bunk House*	1,008	Retain	
109	Youth Tent Structure 1*	207	Retain	
110	Youth Bunk House*	240	Retain	
111	Youth Tent Structure 2*	238	Retain	
112	Youth Tent Structure 3*	405	Retain	
113	Youth Tent Structure 4*	420	Retain	
114	Youth Tent Structure 5*	700	Retain	
115	Youth Tent Structure 6*	405	Retain	
116	Bunk and Tents*	168	Retain	
117	Youth Bunk House*	480	Retain	

* - indicates that the structure is part of Camp Alonim.

(3) Assembly Uses: During the 42 weeks when the camps are not in session (i.e., outside of the summer months), the Project Site may be used for assembly purposes. This includes educational day and overnight programs sponsored by schools, synagogues, churches,

and community organizations. The permit authorizes up to 300 guests on weekends, up to 100 guests on weekdays, and up to 20 educational staff members.

e) Land Use Plans and Zoning

While most of the Subject Parcels are zoned Open Space (OS-160 ac.) and designated in the Open Space land use category, the 328-acre portion (Project Site) where camp facilities are located is zoned Rural Agricultural (RA-160 ac.) and carries a Rural land use category.

f) Surrounding Land Uses

The City of Simi Valley abuts the camp property to the north and west. Business parks are the predominant form of development north of the camp, while residential subdivisions lie to the west and northeast. Lands to the east include a private ranch and Sage Ranch Park, which features hiking, picnicking, and camping. The Santa Susana Field Laboratory (SSFL), a facility owned by the Department of Energy, National Aeronautics and Space Administration, and the Boeing Company, is located south of the camp.

3. Project Characteristics

a) Physical Improvements

The Project Applicant proposes to add the following facilities to the camp:

(1) Welcome Center: A 4,460-square-foot building is proposed to function as the entry point for campers arriving at Camp Alonim. This building would include a lobby, staff lounges, offices, and meeting rooms. It will also include 1,925 sq. ft. in deck space. The building would be constructed in a modern design with an articulated façade and "shed style" roof. The maximum building height is 17 feet.

(2) Camper Cabins (Building Nos. C1-C13): Thirteen (13) "duplex-style" camper cabins would be constructed on the hillside above the central green. The cabins are each 1,930 sq. ft. in size and include 332 sq. ft. in deck space. The layout for each cabin includes two sleeping rooms with a total of 32 bunk beds, 16 in each room. The camper cabins function like a duplex: each room has internal access to a bathroom, but there is no internal access between the rooms. The cabins would employ a modern architectural design with a "shed style" roof. A rain barrel has also been incorporated into the design to reduce runoff and provide a source of irrigation water. The maximum building height is 12 feet.

(3) Head Counselor Cabins (Building Nos. H1-H3): Three (3) cabins for head counselors would be constructed in the same area as the camper cabins. These cabins each have an area of 441 sq. ft. plus a 135-square-foot deck. The floorplan includes two bedrooms, a common area with kitchenette, and a bathroom. Like the camper cabins, these cabins would be constructed in a modern design with "shed style" roof and include a rain barrel. The maximum building height is 12 feet.

(4) Arts Pavilion: A 2,308-square-foot shade structure would be constructed adjacent to the Needleman Arts Building to allow for additional arts and crafts activities. Most of the structure would be open-air. However, walls would enclose 233 sq. ft. to create two art studios and a 60-square-foot kiln. The pavilion would be an architecturally unique structure that uses varying roof lines to convey an artistic theme. The maximum building height is 17 feet.

(5) Parking Lot: A new 58-space parking lot would be constructed adjacent to the proposed Welcome Center. A driveway would extend from the parking lot to connect with High Road. A circular drop-off area using enhanced landscaping and decorative pavers would link the parking lot with the Welcome Center. Portions of the parking lot, approximately 0.06 acres in area, would encroach into wetlands associated with the East Tributary of Meier Canyon Creek that fall under the jurisdiction of the California Department of Fish and Wildlife (CDFW).[1]

(6) Landscaping: Landscaping improvements would include new ornamental planting around the proposed structures and parking lot. Additionally, new trails would connect the proposed cabins with other camp facilities. The conceptual landscape plans call for the planting of 110 trees, 77 of which would be native species (e.g., oak, sycamore, and toyon).

All proposed development would be located on the east side of the East Tributary of Meier Canyon Creek, where existing road access is provided without crossing creeks. No new creek crossings are proposed. Existing crossings, which include three bridges and four "Arizona" crossings, would continue to be used in support of camp activities.[2]

Several structures are proposed for demolition to accommodate the proposed improvements. These include three trailers used for staff housing (Building Nos. 55 through 57), two cottages used for staff housing (Building Nos. 9 and 10), and a detached garage (Building No. 11).

The Project's site plan is included in Figure II-7. Figure II-8 shows an enlarged view of the Welcome Center and parking lot, Figure II-9 shows an enlarged view of the hillside cabins, and Figure II-10 shows the floor plan for the Arts Building. Exterior elevations are provided in Figures II-11 through II-14, while building sections are provided in Figures II-15 through II-17. Finally, the conceptual landscape plans are provided in Figures II-18 through II-20.

Table II-1, above, provides a summary of the existing structures on the Project Site as well as notes the alterations to these structures as part of the Project.

By retaining existing bunk houses and tent structures while only increasing camp population by 100 overnight guests, the camp expects to balance out the density of campers. Based on this, it is anticipated that these structures will be occupied at a lower intensity than current operations.

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[1] Ventura County General Plan Conservation and Open Space Element Policy COS-1.9 requires consultation with the California Department of Fish and Wildlife (CDFW) to ensure that impacts to biological resources are avoided or minimized.

[2] As noted in Footnote 1, above, General Plan Policy COS-1.9 requires consultation with CDFW as part of the discretionary permit process. Any consultation should include discussion of the ongoing use of existing creek crossings.



Figure II-7
Site Plan

Source: Abramson Architects, 2023.

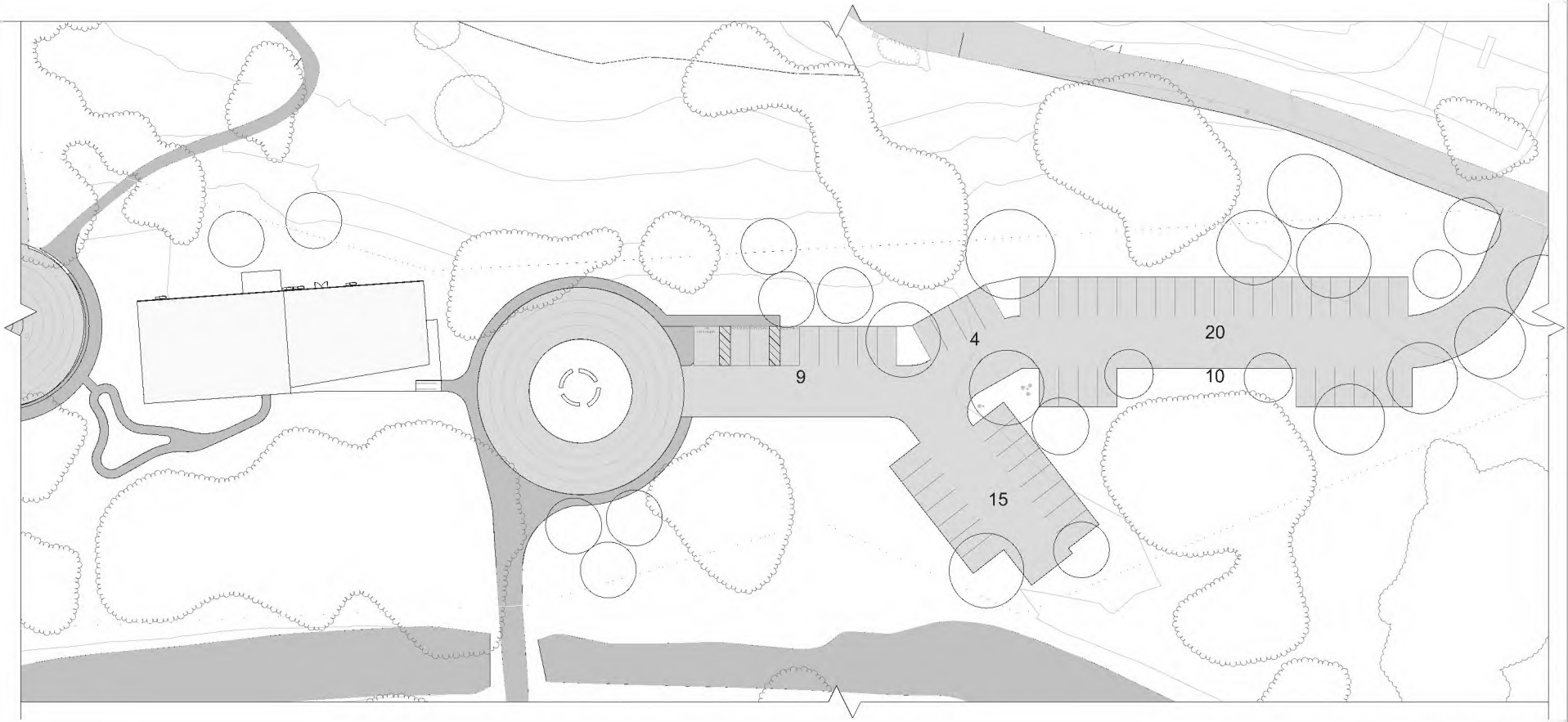


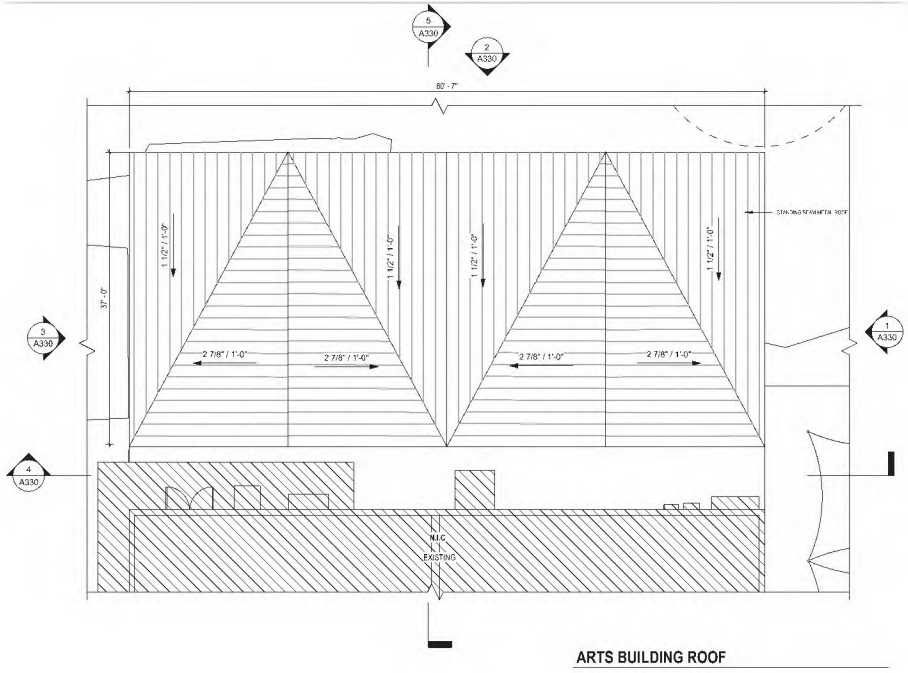
Figure II-8
Enlarged Site Plan, Welcome Center and Parking Lot

Source: Abramson Architects, 2023.

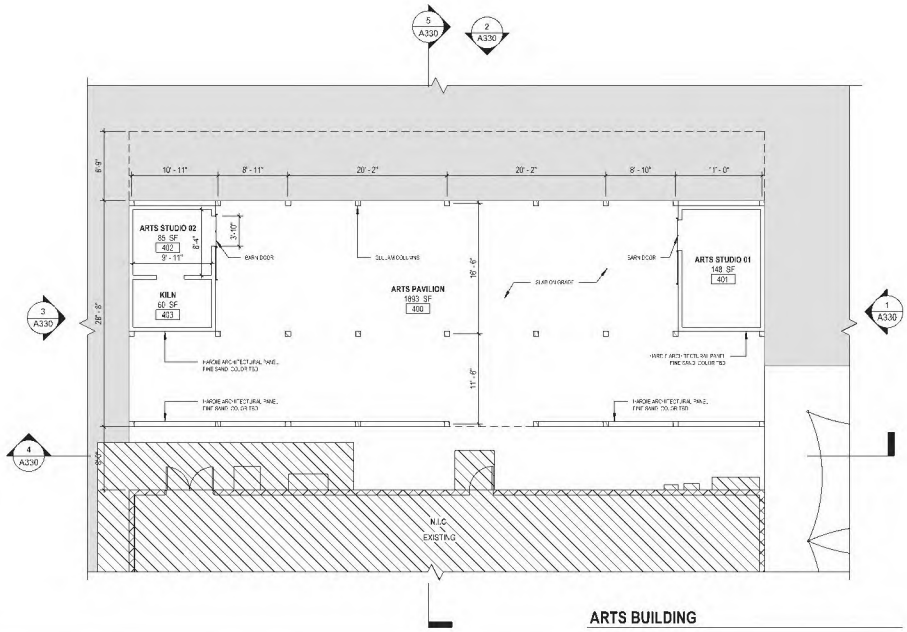


Source: Abramson Architects, 2023.

Figure II-9
Enlarged Site Plan, Hillside Cabins



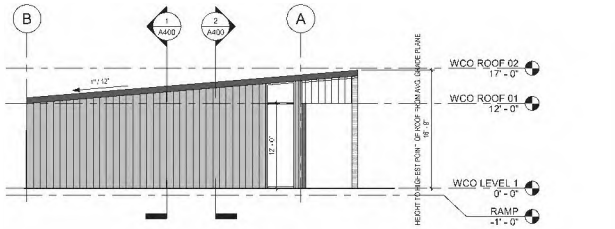
ARTS BUILDING ROOF



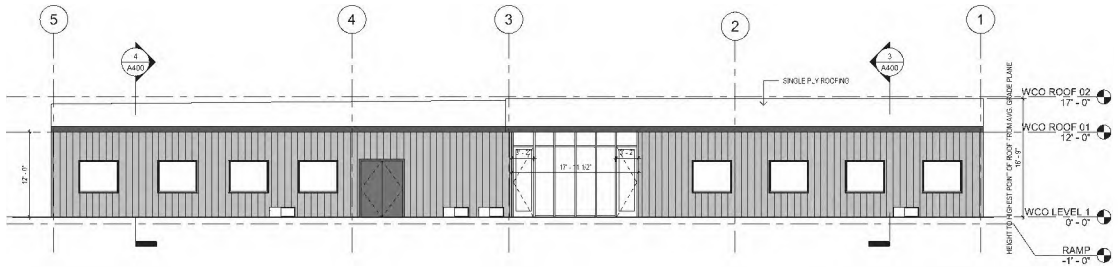
ARTS BUILDING

Source: Abramson Architects, 2023.

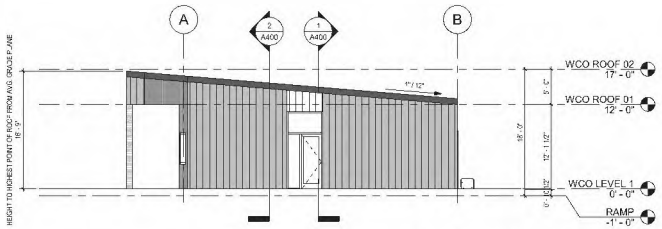
Figure II-10
Arts Building Floor Plan



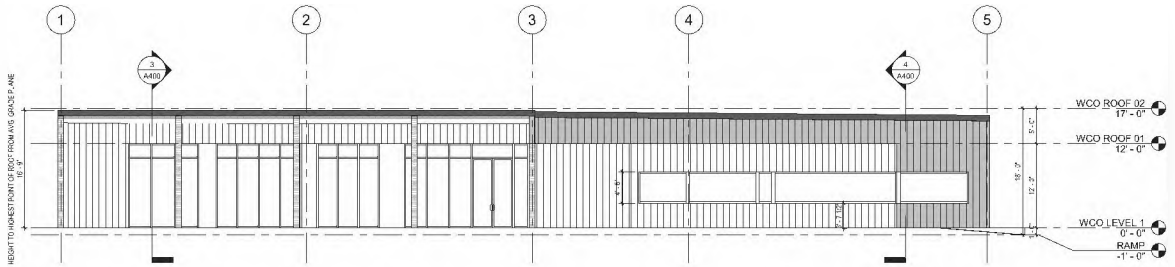
WEST ELEVATION



NORTH ELEVATION



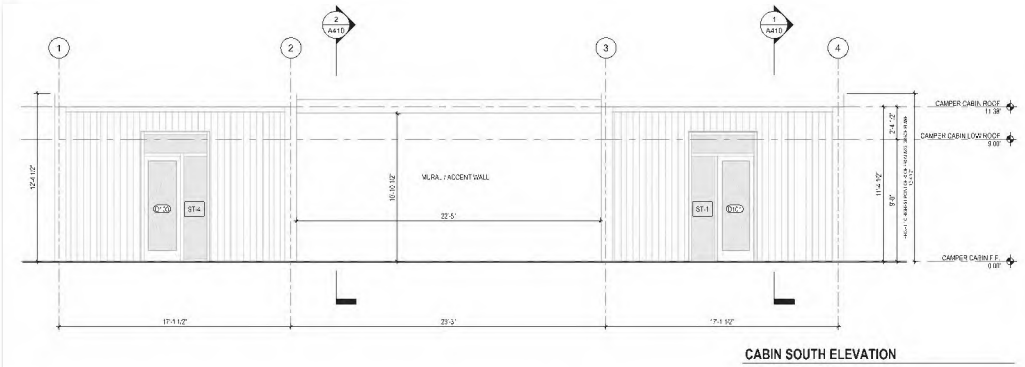
EAST ELEVATION



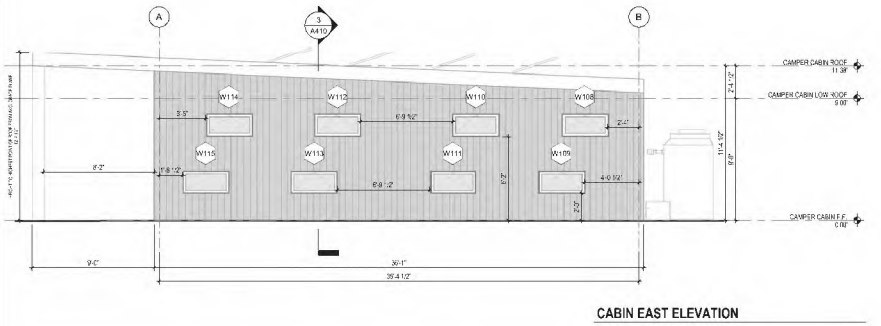
SOUTH ELEVATION

Source: Abramson Architects, 2023.

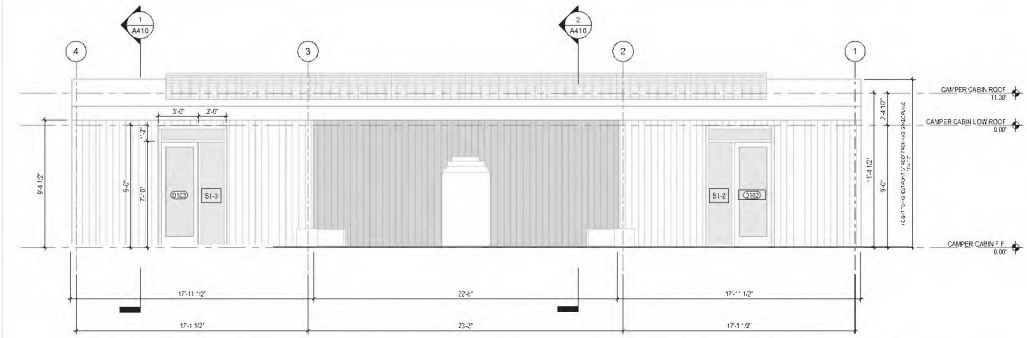
Figure II-11
Exterior Elevations 1



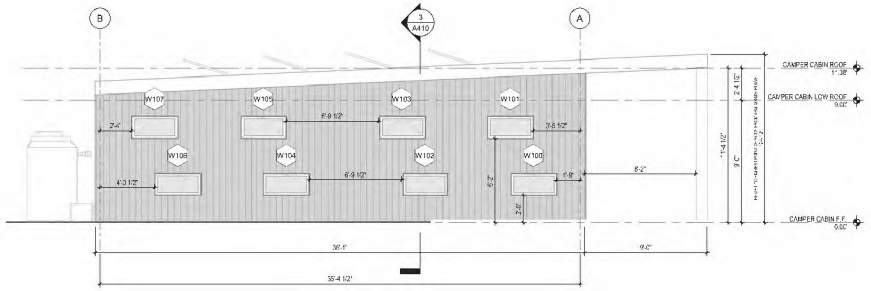
CABIN SOUTH ELEVATION



CABIN EAST ELEVATION



CABIN NORTH ELEVATION



CABIN WEST ELEVATION

Source: Abramson Architects, 2023.

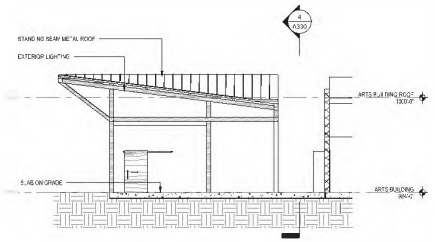
Figure II-12
Exterior Elevations 2



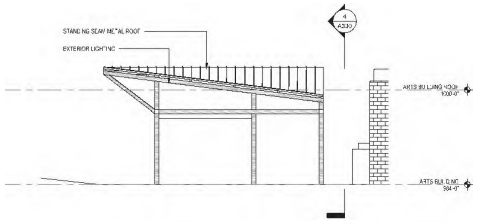




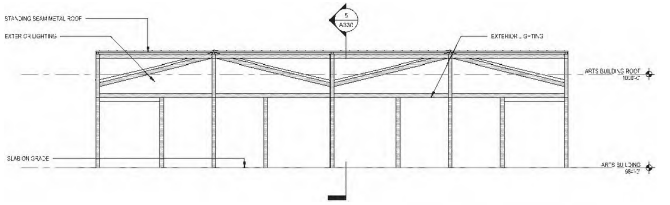
NOTE: ALL BUILDINGS IN SCOPE TO BE EQUIPPED WITH AUTOMATIC FIRE SPRINKLERS



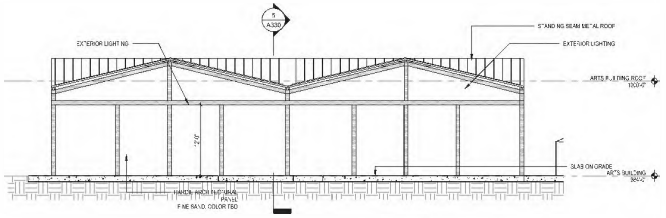
ARTS BUILDING SECTION 02



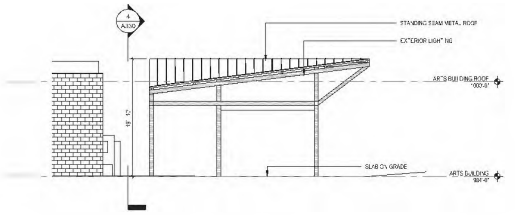
ARTS PAVILION WEST ELEVATION



ARTS PAVILION NORTH ELEVATION



ARTS BUILDING SECTION 01



ARTS PAVILION EAST ELEVATION

Source: Abramson Architects, 2023.

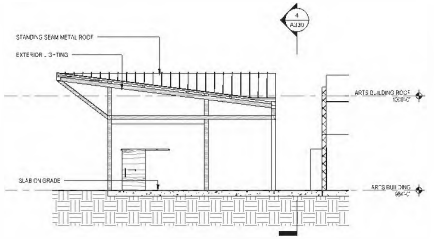
Figure II-13
Exterior Elevations 3



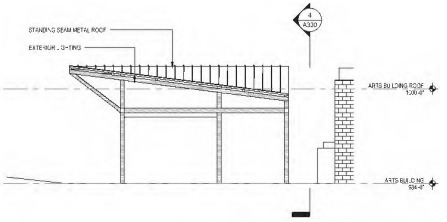




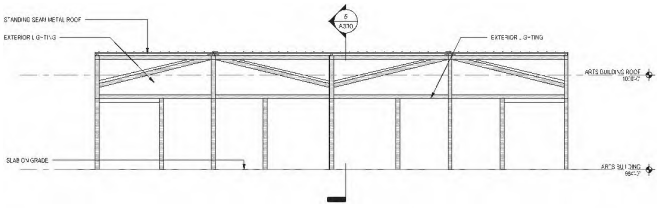
NOTE: ALL BUILDINGS IN SCOPE TO BE EQUIPPED WITH AUTOMATIC FIRE SPRINKLERS



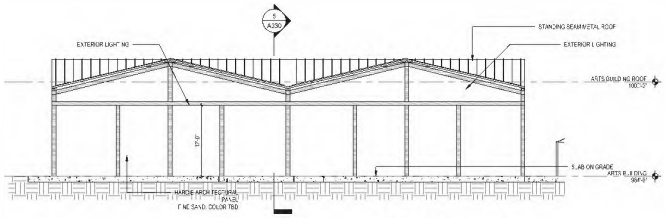
ARTS BUILDING SECTION 02



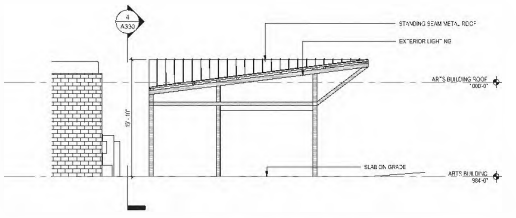
ARTS PAVILION WEST ELEVATION



ARTS PAVILION NORTH ELEVATION



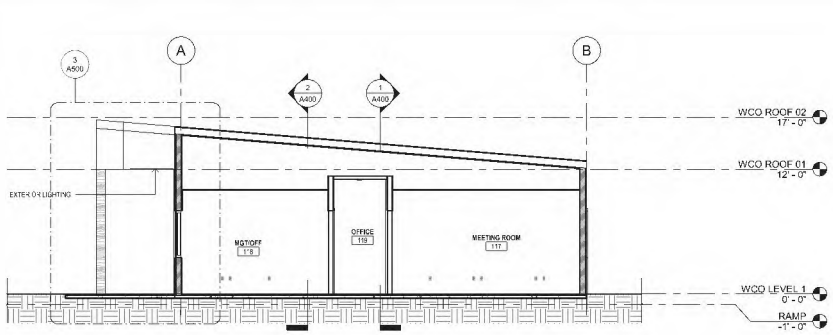
ARTS BUILDING SECTION 01



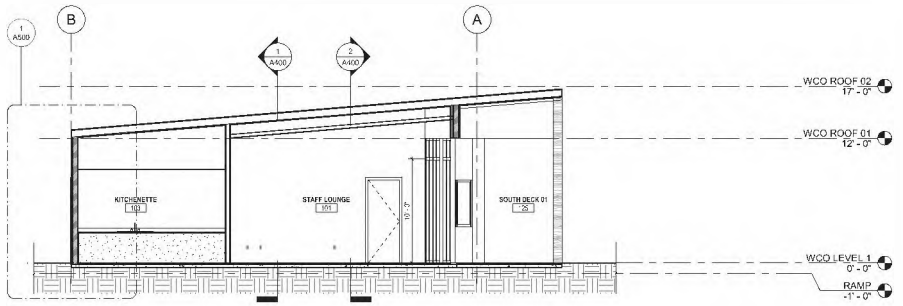
ARTS PAVILION EAST ELEVATION

Source: Abramson Architects, 2023.

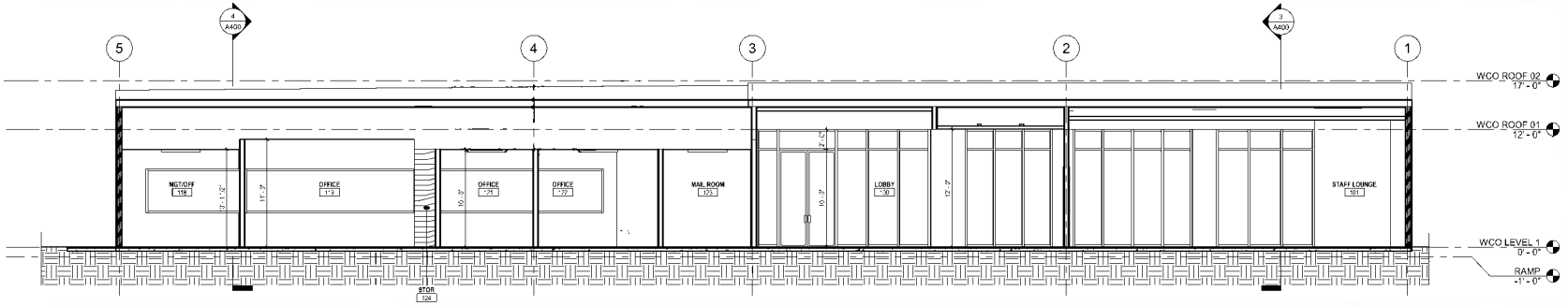
Figure II-14
Arts Building Elevations and Sections



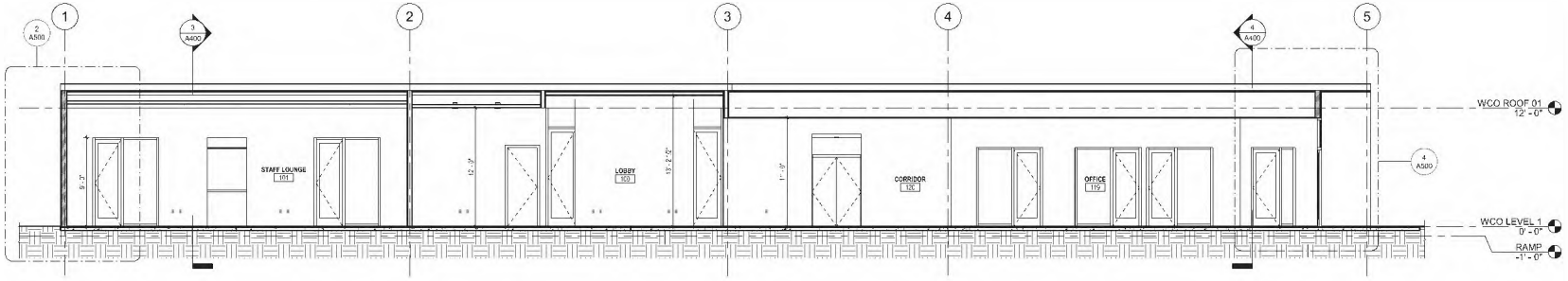
NORTH SOUTH SECTION 03



NORTH SOUTH SECTION 01



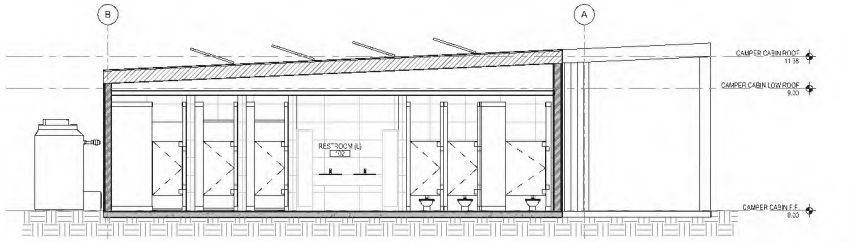
EAST WEST SECTION WORKING



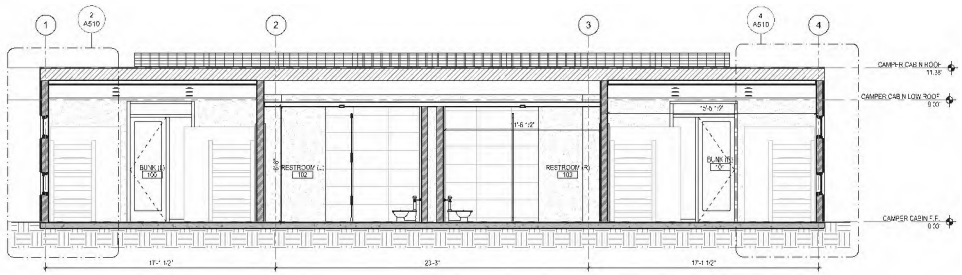
EAST WEST SECTION 01

Source: Abramson Architects, 2023.

Figure II-15
Building Sections 1

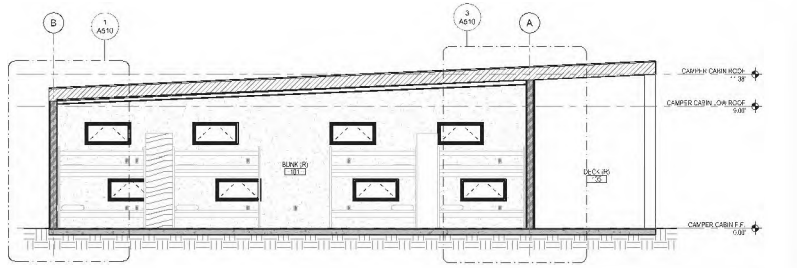


NORTH SOUTH SECTION @ RESTROOMS



NOTE: ALL BUILDINGS IN SCOPE TO BE EQUIPPED WITH AUTOMATIC FIRE SPRINKLERS

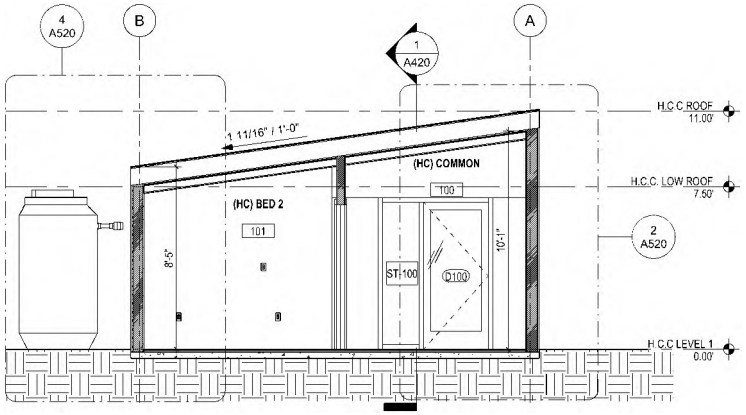
EAST WEST SECTION



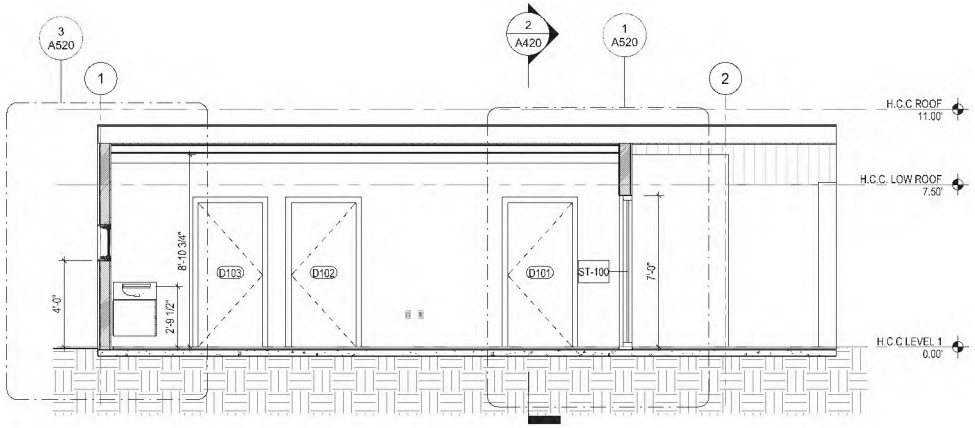
NORTH SOUTH SECTION @ BUNKS

Source: Abramson Architects, 2023.

Figure II-16
Building Sections 2



SECTION @ COMMON ROOM AND BED ROOM



SECTION @ COMMON ROOM

Source: Abramson Architects, 2023.

Figure II-17
Building Sections 3

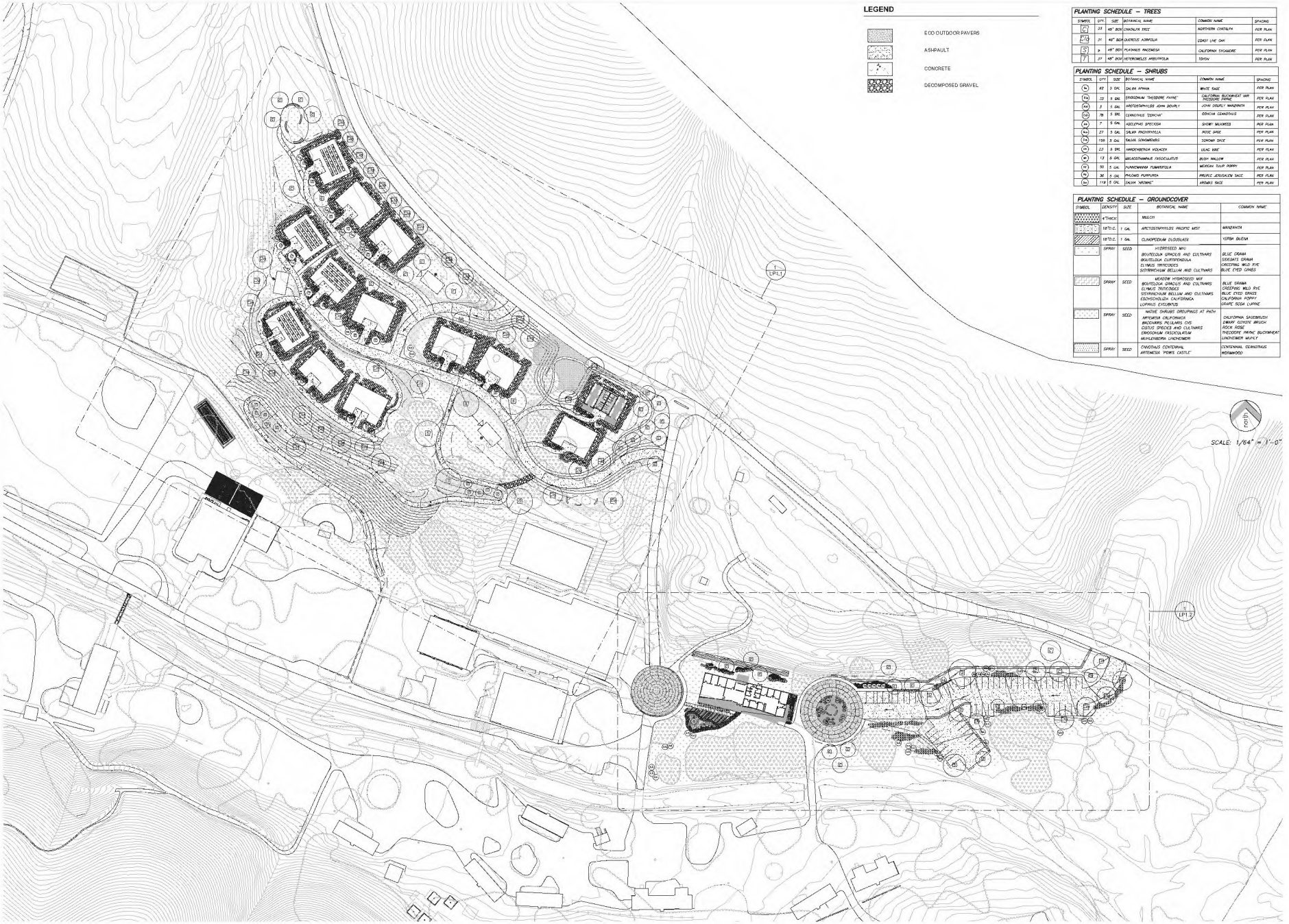


Figure II-18
Overall Planting Plan

Source: Abramson Architects, 2023.



PLANTING SCHEDULE – TREES

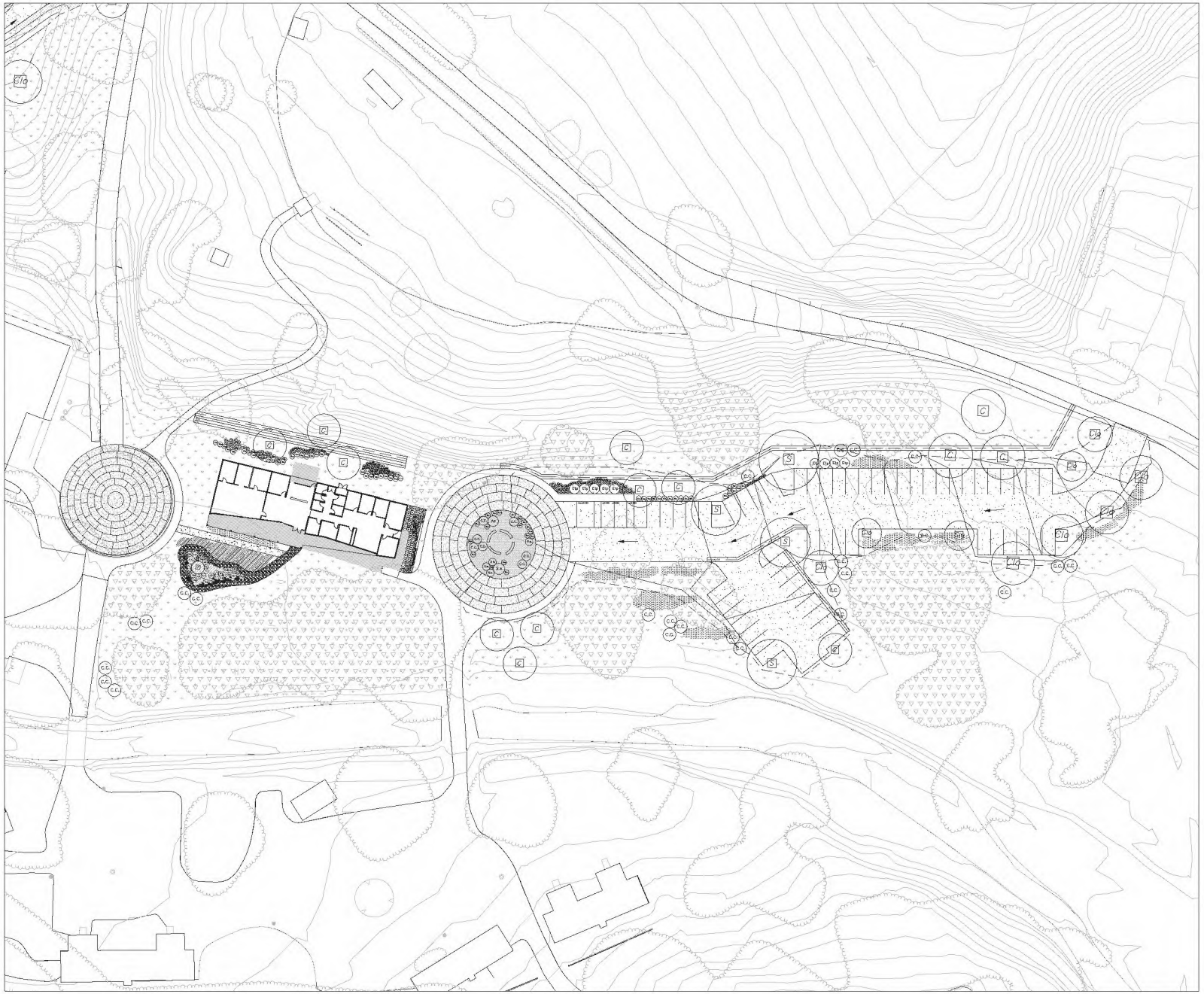
SYMBOL	QTY	SIZE	BOTANICAL NAME	COMMON NAME	SPACING
C	33	48" BOX	CHAMAEYA TREE	NORTHERN CHAMAEYA	PER PLAN
C/A	31	48" BOX	QUERCUS AGRIFOLIA	COAST LIVE OAK	PER PLAN
S	9	48" BOX	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	PER PLAN
T	37	48" BOX	HETEROMELES ARBUTIFOLIA	TOYON	PER PLAN

PLANTING SCHEDULE – SHRUBS

SYMBOL	QTY	SIZE	BOTANICAL NAME	COMMON NAME	SPACING
SC	69	5 GAL	SALVIA CLEVELANDII	WHITE SAGE	PER PLAN
EM	33	5 GAL	ERIOGONUM 'THEODORE PAYNE'	CALIFORNIA BUCKWHEAT 'THEODORE PAYNE'	PER PLAN
AM	3	5 GAL	ARCTOSTAPHYLOS 'JOHN DOURLY'	JOHN DOURLY MANZANITA	PER PLAN
CC	78	5 GAL	CEANOTHUS 'DIMONTH'	CONCHA CEANOTHUS	PER PLAN
AS	7	5 GAL	ASCLEPIAS SPECIOSA	SHOWY MILKWEED	PER PLAN
SA	27	5 GAL	SALVIA PACHYPHYLLA	ROSE SAGE	PER PLAN
SA	156	5 GAL	SALVIA SONOMENSIS	SONOMA SAGE	PER PLAN
HV	23	5 GAL	HARDENBERGIA VIOLACEA	LILAC VINE	PER PLAN
MF	13	5 GAL	MALACOTHAMNUS FASCICULATUS	BUSH MALLOW	PER PLAN
MC	20	5 GAL	HUMEMANNIA FUMARIIFOLIA	MEXICAN TULIP POPPY	PER PLAN
PC	38	5 GAL	PHLOMIS PURPUREA	PURPLE JERUSALEM SAGE	PER PLAN
SM	118	5 GAL	SALVIA 'SPOMIS'	AROMAS SAGE	PER PLAN

PLANTING SCHEDULE – GROUNDCOVER

SYMBOL	DENSITY	SIZE	BOTANICAL NAME	COMMON NAME
	4"THICK		MULCH	
	18" O.C.	1 GAL	ARCTOSTAPHYLOS 'PACIFIC MIST'	MANZANITA
	18" O.C.	1 GAL	CEANOTHUS 'DIMONTH'	CONCHA CEANOTHUS
	SPRAY	SEED	HYDROSEED MIX: MUHLENBERGIA RIGENS AND CULTIVARS FESTUCA CAMPESTRIS II ELYMUS TRITICOIDES DISTICHLIS SPICATA AND CULTIVARS	BLUE GRAMA SEASIDE GRAMA<



PLANTING SCHEDULE – TREES

SYMBOL	QTY.	SIZE	BOTANICAL NAME	COMMON NAME	SPACING
C	33	48" BOX	CINNAMOMUM SPP.	NORTHERN CINNAMON	PER PLAN
Q	31	48" BOX	QUERCUS AGRIFOLIA	COAST LIVE OAK	PER PLAN
S	9	48" BOX	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	PER PLAN
T	27	48" BOX	HETEROMELES ARBUTIFOLIA	TOYON	PER PLAN

PLANTING SCHEDULE – SHRUBS

SYMBOL	QTY.	SIZE	BOTANICAL NAME	COMMON NAME	SPACING
Sa	82	5 GAL	SALVIA APIANA	WHITE SAGE	PER PLAN
Pm	33	2 GAL	CROSSOSOMA THEODORE PAYNE'	CALIFORNIA BLACKBERRY VAR THEODORE PAYNE	PER PLAN
Ad	2	5 GAL	ARCTOSTAPHYLOS JOHN DOURLY	JOHN DOURLY MANZANITA	PER PLAN
Cc	78	5 GAL	CEANOTHUS 'ERNOM'	ERNOM CERANOTHUS	PER PLAN
Ae	7	5 GAL	ASCLEPIAS SPECIOSA	SHOWY MILKWEED	PER PLAN
Ro	27	5 GAL	SALVIA PACHYPHYLLA	ROSE SAGE	PER PLAN
Sc	158	5 GAL	SALVIA SONOMENSIS	SONOMA SAGE	PER PLAN
Hv	22	5 GAL	HARDENBERGIA VIOLACEA	LILAC VINE	PER PLAN
Mf	17	5 GAL	MALACOTHAMNUS FASCICULATUS	BUSH MALLOW	PER PLAN
Ek	82	5 GAL	HUNNEMANNIA FUMARIIFOLIA	MEXICAN TULIP POPPY	PER PLAN
Pf	38	5 GAL	PHLOMIS PURPUREA	PURPLE JERUSALEM SAGE	PER PLAN
Sw	178	5 GAL	SALVIA 'WIDHAMS'	WIDHAMS SAGE	PER PLAN

PLANTING SCHEDULE – GROUNDCOVER

SYMBOL	DENSITY	SIZE	BOTANICAL NAME	COMMON NAME
	4"THICK		MULCH	
	18"O.C.	1 GAL	ARCTOSTAPHYLOS PACIFIC MIST	MANZANITA
	18"O.C.	1 GAL	CLINOPODIUM DOUGLASII	YERBA BUENA
	SPRAY	SEED	HYDROSEED MIX: BOUTELOUA GRACILIS AND CULTIVARS BOUTELOUA CURTIPENDULA ELYMUS TRITICOIDES SISYRINCHIUM BELLUM AND CULTIVARS	BLUE GRAMA SIDEOATS GRAMA CREEPING WILD RYE BLUE EYED GRASS
	SPRAY	SEED	HYDROSEED HYDROSEED MIX BOUTELOUA GRACILIS AND CULTIVARS ELYMUS TRITICOIDES SISYRINCHIUM BELLUM AND CULTIVARS ESCHSCHOLZIA CALIFORNICA LUPINUS EXCUBITUS	BLUE GRAMA CREEPING WILD RYE BLUE EYED GRASS CALIFORNIA POPPY GRAPE SODA LUPINE
	SPRAY	SEED	NATIVE SHRUBS GROUPINGS AT PATH ARTEMISIA CALIFORNICA BACCHARIS PILULARIS DVS CISTUS SPECIES AND CULTIVARS ERIOGONUM FASCICULATUM MUHLENBERGIA LINDHEIMERI	CALIFORNIA SAGEBRUSH DWARF COYOTE BRUSH ROCK ROSE THEODORE PAYNE BUCKWHEAT LINDHEIMER MUHLY
	SPRAY	SEED	CANOTHUS CENTENNIAL ARTEMISIA 'POMES CASTLE'	CENTENNIAL CERANOTHUS WORMWOOD

LEGEND

- ECO OUTDOOR PAVERS
- ASHPAULT
- CONCRETE
- DECOMPOSED GRAVEL

Source: Abramson Architects, 2023.

Figure II-20
Welcome Center Enlarged Planting Plan

b) Modifications to Camp Attendance and Proposed Events

As part of the Project, the Applicant is seeking increases in camp population, the frequency of events, and number of event attendees. Camper population is presently limited to 472 (400 for Camp Alonim and 72 for BCI). The Project would increase Camp Alonim's population to 500, resulting in a total of up to 572 campers on the Project Site.

The Applicant further seeks intensification of the event use. This would include:

- up to 150 events per year, each with up to 300 attendees;
- up to 10 events per year, each with up to 500 attendees; and
- up to six events per year, each with up to 1,000 attendees.

Under the Project, these events could occur on any day of the week and would be restricted to the hours of 10:00 AM to 11:00 PM.

c) Modifications to Permit Term

The Conditional Use Permit (CUP) modification would include the extension of the CUP's expiration. The CUP presently expires on September 15, 2044. The proposal would extend the CUP and potentially eliminate expiration so that the CUP could remain in operation indefinitely.

d) Trees

To accommodate the Project, the Applicant proposes the removal of a total of 74 trees, 15 of which are protected under the provisions of the County Non-Coastal Zoning Ordinance (NCZO). Therefore, a discretionary tree permit is required for the Project. The protected trees to be removed include nine coast live oaks, one sycamore, and five large ornamental trees that are classified as heritage trees. The heritage trees include four pepper trees and one eucalyptus tree. Development would also encroach upon the protected zone of an additional 67 trees, 42 of which are protected trees. These include 20 oaks, 18 sycamores, and four heritage-sized pepper trees.

e) Access

Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. All camp traffic is routed through a security gate, where Peppertree Lane begins. Within the camp, Peppertree Lane splits into the "Low Road," which follows along the east side of the creek through the center of the camp, and the "High Road," which skirts along the hillside at the edge of the camp's developed area. As part of the Project, traffic associated with Camp Alonim would be directed along the High Road to the new Welcome Center parking lot. This routing would help to avoid interference with camp activities and conflicts with campers crossing the road to access facilities. In an emergency that impairs the primary access at the front security gate, evacuees can use a secondary egress point at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley via Hidden Ranch Drive.

f) Utilities

Southern California Edison provides electricity to the camp. SoCal Gas provides natural gas service to the main camp, but propane tanks are used at the House of the Book, as there is no gas service in that part of the campus. AT&T provides phone service to the campus, while Tierzero provides internet service. The City of Simi Valley supplies wastewater collection and treatment services. Water service is provided by the Brandeis Bardin Mutual Water Company (BBMWC). BBMWC receives imported water from the Calleguas Municipal Water District. No groundwater is used. The Conditional Use Permit, as modified, will include formal authorization of the BBMWC system. Project impacts related to utilities and service systems are addressed in Section IV.Q, Utilities and Service Systems, of this Draft EIR.

g) Construction Details

The Project's construction would occur over approximately 22 months and would include the following phases: demolition, site preparation, grading and excavation, drainage/utilities/trenching, foundations, building construction, paving, and architectural coatings. The Project is expected to become operational in 2028. The Project's estimated construction schedule is shown in Table II-2.

Table II-2
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of seven structures totaling 11,322 square feet of building floor area hauled twenty miles to landfill in 14-cubic yard capacity trucks.
Site Preparation	Month 2	Grubbing and removal of trees, plants, landscaping, weeds
Grading	Months 3-4	Fine grading of the site, with 67,600 cubic yards of total cut and 67,600 cubic yards of total fill.
Trenching	Months 5-10	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 11-22	Foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 11	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 20-22	Application of interior and exterior coatings and sealants.

4. Project Objectives

The objectives of the Project are to:

- Provide improved facilities and accommodations in support of camp operations.
- Enhance camp safety by reducing potential pedestrian and vehicle conflicts.
- Relocate camp accommodations to areas outside of the FEMA flood hazard zone.
- Consolidate camp administration and operations.
- Preserve and enhance the aesthetic appearance of the camp
- Educate campers on the use of energy and water efficient facilities.

5. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all public agency actions associated with the Project. The discretionary approvals required to implement the Project are:

1. Major Modification to Conditional Use Permit No. 1776.
2. Discretionary Tree Permit.

Ministerial permits and approvals that may be deemed necessary, include, but are not limited to, encroachment permits, grading permits, and building permits.

6. Responsible and Trustee Public Agencies

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the lead agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project. A Trustee Agency under CEQA is a state agency that has jurisdiction over natural resources affected by a project, that are held in trust for the people of the State of California. The California Department of Fish and Wildlife (CDFW) has been identified as a Trustee Agency for the Project.

III. ENVIRONMENTAL SETTING

1. Overview of Environmental Setting

CEQA Guidelines Section 15125 requires that an Environmental Impact Report (EIR) include a description of the existing physical environment. This chapter provides a general overview of the existing regional and local setting in which the Project Site is located and a brief description of the existing conditions at the Project Site. Detailed information on existing conditions for each environmental topic is provided in Chapter IV, Environmental Impact Analysis, of this Draft EIR. This chapter also provides an overview of other potential reasonably foreseeable projects (i.e., related projects) in the vicinity of the Project Site that the County of Ventura (County) has determined could potentially result in cumulative impacts and are considered as part of the cumulative impacts analysis.

a) Project Location

The approximately 2,558-acre Subject Parcels are located at 1101 Peppertree Lane on two legal lots known as Assessor Parcel Numbers (APNs) 685-0-051-040, -050, -140, -190, and -210. The Project Site consists of a 328-acre portion of the Subject Parcels and is situated along the East Tributary of Meier Canyon Creek, immediately south of the City of Simi Valley. Access is provided from the southern end of Tapo Canyon Road.

b) On-Site Conditions

The Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion (i.e., Project Site) of the 2,558-acre Subject Parcels. There are 117 existing structures associated with the camp, totaling approximately 208,000 square feet (sq. ft.) (refer to Table II-1 in Section II, Project Description, of this Draft EIR). Structural development on the campus includes an eclectic mix of rustic cabins and modern institutional structures. While most of the buildings used for congregating, activities and dining have been constructed since the 1980s, many of the tents, cabins, and cottages date to the 1950s, 1960s, and 1970s. A few cottages and outbuildings had been established for prior ranch use and pre-date the camp.

The cabin area is located at the bottom of a small canyon that includes a mix of semi-natural stands of mustards, non-native grasses, and sparse native herbaceous species, which looks like it is frequently cleared. West and south of the cabins are buildings and developed land for camp activities, including dining halls, sports fields, and a pool. The landscape across the site is a mix of ornamental landscaping, turf, planted non-native trees, and pre-existing native trees. Meier Canyon Creek, which is part of the Arroyo Simi watershed, and the East Tributary of Meier Canyon Creek, bisect the developed portion of the camp. See also Figure IV.E-1 in Section IV.E, Biological Resources, of this Draft EIR.

c) Surrounding Land Uses

The City of Simi Valley abuts the camp property to the north and west. Business parks are the predominant form of development north of the camp, while residential subdivisions lie to the west and northeast. Lands to the east include a private ranch and Sage Ranch Park, which features hiking, picnicking, and camping. The Santa Susana Field Laboratory (SSFL), a facility owned by the Department of Energy, National Aeronautics and Space Administration, and the Boeing Company, is located south of the camp. A map of the surrounding land uses is provided in Figure III-1, and an aerial map is provided in Figure III-2.

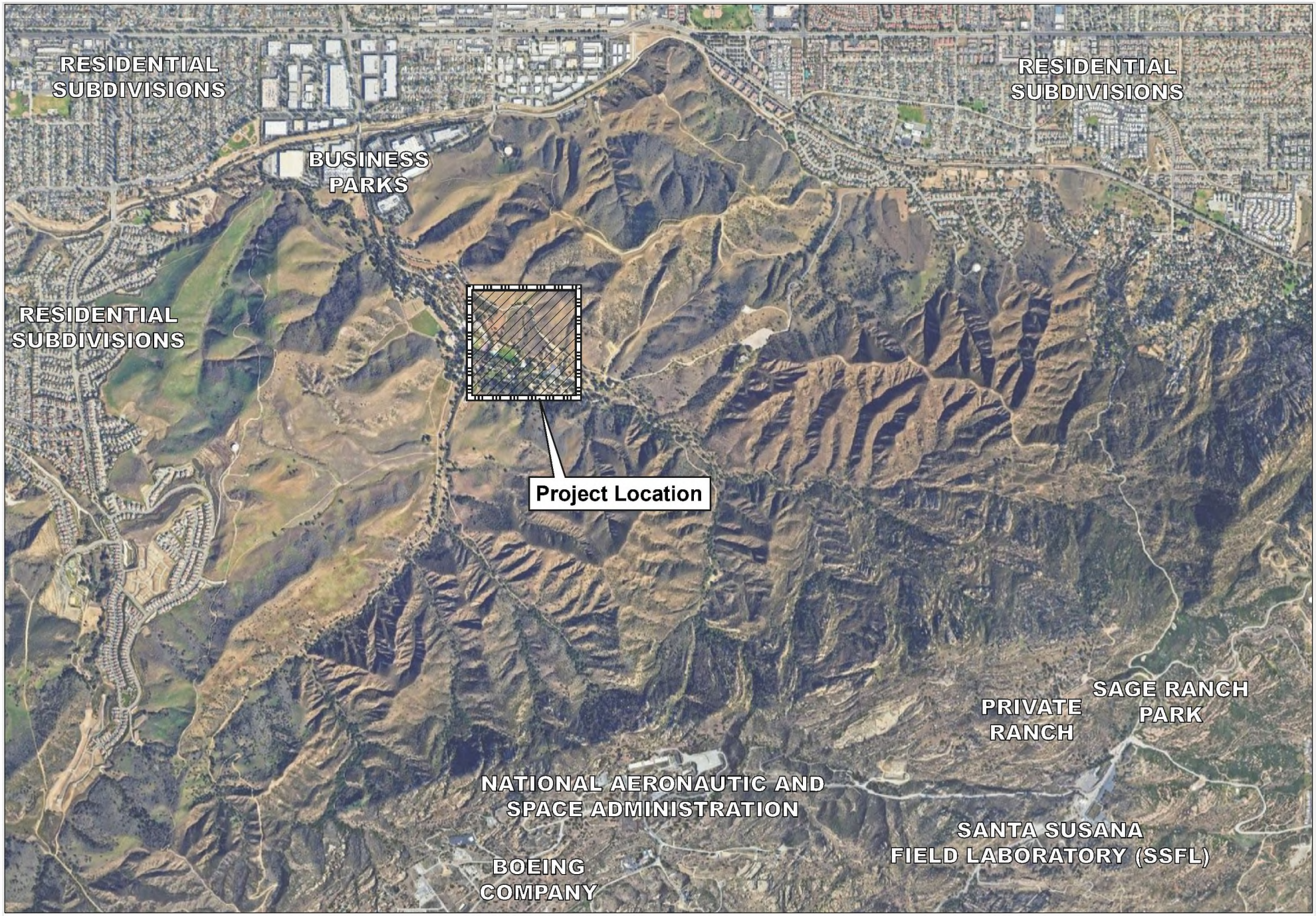
The SSFL was used between the 1950s and early 2000s by the federal government and its contractors for research and development of rocket engines and nuclear reactors. The SSFL site, which lies upstream of the Brandeis-Bardin Campus, is the subject of ongoing cleanup efforts overseen by the US Environmental Protection Agency and the California Department of Toxic Substance Control. A study from 1992 noted that SSFL-related contaminants were detected on the Brandeis-Bardin property.[1] A Lot Line Adjustment recorded in 1998 resulted in the transfer of the southernmost portions of Brandeis-Bardin property, where radionuclide contamination was documented, to Rocketdyne (now Boeing). This area is now termed the "Northern Buffer Zone" of the SSFL. The California Department of Toxic Substance Control reported in 2017 that sampling results on the Brandeis-Bardin Campus "are all generally around or within the natural background range and there is no indication of a grouping or pattern that would indicate a contaminant release on [Brandeis-Bardin's] current property."[2] American Jewish University continues to conduct soil and groundwater testing to confirm that the camp is safe for use.[3] As discussed in the Phase I Environmental Site Assessment prepared for the Project Site (included in Appendix G of this Draft EIR), in August of 2023, samples of soil, sediments, water, and fruit were collected from across the campus. The results of this testing showed that the samples appeared consistent with natural conditions and did not indicate impacts from the SSFL. Project impacts related to hazards and hazardous materials are discussed in greater detail in Section IV.J, Hazards and Hazardous Materials, of this Draft EIR.

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1 Hambrick, Dixie A, P.G..; Mark Sherwin, P.G.; and Kevin Lapus (December 2007). Offsite Data Evaluation Report, Santa Susana Field Laboratory, Ventura County, California. MWH: Arcadia, CA (referencing McLaren / Hart Environmental Engineering Corporation (February 1992). Work Plan for Multi-Media Sampling at the Brandeis-Bardin Institute and the Santa Monica Mountains Conservancy). Available at: https://www.etec.energy.gov/Environmental_and_Health/Documents/OffsiteReport/Offsite_Data_Evaluation_Report_Final_Text_Tables_Figures.pdf

2 California Department of Toxic Substance Control (May 2017). Executive Summary of DTSC's May 2017 Technical Memorandum on the American Jewish University – Brandeis Bardin Institute Campus. Available at: https://www.dtsc-ssfl.com/files/lib_offsite_investig/bbi/DTSCTechMem/67397_SSFL_Executive_Summary_of_BBI_Technical_Memo-final_doclib.pdf

3 Available at: https://www.aju.edu/about-aju/our-campuses/brandeis-bardin-safety-data.



Source: Google Maps 2024.

Figure III-1
Surrounding Uses


Los Angeles Ave
Tapo St
Los Angeles Ave
Tapo Canyon Rd
Guardian St
Peppertree Ln
Peppertree Ln
White Bark Ln

d) Land Use Plans and Zoning

While most of the Subject Parcels is zoned Open Space (OS-160 ac.) and designated in the Open Space land use category, the 328-acre portion (Project Site) where camp facilities are located is zoned Rural Agricultural (RA-160 ac.) and carries a Rural land use category.

2. Related Projects

Sections 15126 and 15130 of the State CEQA Guidelines require that EIRs consider the significant environmental effects of a proposed project as well as "cumulative impacts." "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (CEQA Guidelines Section 15130 (b)(1)(A)).

Either of the following is necessary to conduct an adequate analysis of cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project are included in the EIR. For an analysis of the cumulative impacts associated with these related projects in combination with the Project, cumulative impact discussions are provided under each individual environmental impact category in Section IV, Environmental Impact Analysis, of this Draft EIR.

The related projects provided in Table III-1 list consists of the following: 10 projects in Ventura County (see Figure III-3); 87 projects in the City of Simi Valley, including 34 residential projects (see Figure III-4), two mixed-use projects (see Figure III-5), 34 commercial projects (see Figure III-6), and 17 industrial projects (see Figure III-7); 22 projects in the City of Los Angeles (see Figure III-8); five projects in Los Angeles County (see Figure III-9); and two projects in the City of Calabasas (see Figure III-10). Since this list was compiled, it is possible that some of the listed projects may have been completed, reduced in scope, or withdrawn.

Table III-1
Related Projects List

Project Number	Location	Description
Ventura County Related Projects		
PL23-0087	Shangra La Partners APNs: 615-0-500-175 through -205 and -295	Conditional Use Permit for temporary film production for a 4-year term. Filming would be limited to designated areas and subject specific operating protocols. No permanent structures or grading would occur, but temporary sets, facades, and structures for filming and production would be authorized.
PL23-0094	KVM Properties 4730 Tapo Canyon Road, Simi Valley APN: 620-0-320-165	Conditional Use Permit to authorize soil amendment and organics processing for a 10-year period in an 8.8-acre area. Structures for the proposed project include a portable shipping container with electrical connection (120 sq. ft.), portable truck scale (10' x 70'), portable restroom, and portable storage containers (2 x 120 sq. ft.). Equipment for the proposed project includes a screener/blender, grinder, loader, tractors, and trucks that are used to process and transport soil amendment and organic materials. Existing structures related to prior use of the project site for animal husbandry will be removed from the project site as part of this project.
PL22-0029	Holmes APN: 645-0-143-010, -060, and -080 through -100	Lot Line Adjustment between two parcels of 13,482 sq. ft. and 12,827 sq. ft. each in the RE-10,000 sq. ft. zone.
PL23-0071	Brewer and Harris 1226 Aster Street and 6172 Sylvan Drive, Simi Valley APNs: 646-0-011-140 and -200	Lot Line Adjustment between two parcels of 13,693 sq. ft. and 16,947 sq. ft. each in the RE-10,000 sq. ft. zone.
PL24-0035	Living Faith Church 6245 Sylvan Drive, Simi Valley APN: 646-0-200-040	Permit Adjustment to a Conditional Use Permit for an existing church to authorize improvements to the detached single-family dwelling for the church pastor.
PL24-0066	Koehler Trust 7716 Lilac Lane, Simi Valley APNs: 648-0-071-030 and -210	Voluntary Merger between two parcels in the OS-10 ac. and OS-160 ac. zone.
PL20-0104	Bright Trust APNs: 649-0-285-010, -040, -100, and -110	Lot Line Adjustment between two lots of 23,135 sq. ft. and 41,012 sq. ft. each in the RE-20,000 sq. ft. / HCWC / CWPA zone.
PL23-0139	American Jewish University 1101 Peppertree Lane, Simi Valley	Permit Adjustment to a Conditional Use Permit to authorize construction of two additional yurts at an existing summer camp, with no change in camp or staff population.
PL21-0021	Bilaver 46 Bell Canyon Road, Bell Canyon APN: 685-0-060-275	Planned Development Permit to authorize construction of a single-family dwelling of 3,805 sq. ft. with a pool on a vacant lot within the surface water feature buffer in the HCWC overlay zone.

Table III-1
Related Projects List

Project Number	Location	Description
PL24-0051	Rancho Simi Recreation and Parks District 6500 Doubletree Drive, Oak Park APN: 801-0-040-065	Permit Adjustment to a Conditional Use Permit to authorize conversion of two existing tennis courts in a public park (Deerhill Park) into pickleball courts, with operational hours of 7:00 am to 10:00 pm daily.
Simi Valley Related Projects – Residential		
1	North Canyon Ranch North side of Falcon Street, 200 feet west of Erringer Road	Annexation of North Canyon Ranch into the City limits. Amend General Plan Land Use designation to Open Space and Medium Residential. Construct a total of 210 units: 160 detached houses and 50, multi-family, senior, affordable units.
2	Stow Villas 5496 E. Los Angeles Avenue	Construct 16 townhomes with three moderate income residences with an Affordable Housing Agreement.
3	Runkle Canyon Southerly terminus of Sequoia Avenue	Construct 298 single-family residences, 25 custom single-family homes, and 138 senior housing units.
4	Archangel Michael Coptic Orthodox Church 1122 Appleton Road	Construct a 500-seat sanctuary, multi-purpose room, day care center, guest house, and convert existing church to senior center.
5	Lost Canyons 3301 Lost Canyons Drive	Subdivide 1,770 acres for 364 single-family residential lots, recreation commercial lots, and common area lots.
6	Pinehurst Canyon Oaks Drive at northeast corner of Kuehner Drive and 118 Freeway	Construct 24 single- family residences.
7	Meridian Assisted Living Facility 525 East Los Angeles Avenue	Construct a three-story assisted living facility with 106 beds.
8	Fountain Wood Estates Between the eastern terminus of Presidio Drive and Denton Avenue	Construct 13 single-family residences.
9	River House 1424 Patricia Avenue	Construct a 28-unit senior apartment complex with three affordable units with an Affordable Housing Agreement.
10	Sueno Apartments Buyers Street and Shopping Lane	Construct a 10-unit multi-family dwelling with one affordable housing unit with an Affordable Housing Agreement.
11	Nehoray Townhomes Southeast of Los Angeles and Stow Street	Construct eight townhomes.
12	Salame Subdivision 310 Royal Avenue	Subdivide a 1.0-acre parcel into three parcels for residential development of three single-family residences.

Table III-1
Related Projects List

Project Number	Location	Description
13	Melrose West Assisted Living Southeast side of East Cohran Street, 150 feet east of Welcome Court	Construct a 110-unit assisted senior living facility with memory care.
14	Mashihi 1392 & 1408 Patricia Avenue	Construct 25 multi-family units with affordable units with an Affordable Housing Agreement.
15	Nikhoo Apartments 1740 Patricia Avenue	Construct a six-unit apartment complex.
16	Ralston Meadows Estates East of Ralston Avenue, 475 feet south of Leeds Street	Construction of six single-family dwelling units.
17	Simi Country Mobile Home Park 1550 Rory Lane	Planned Development Permit for the installation of new solar panel canopy structures.
18	The Churchill Apartments 1850 Heywood Street 1/4	Planned Development Permit for an 83-unit multi-family apartment project on a 3.11-acre property.
19	Single-Family Residential Development at 3068 Royal Ave 3068 Royal Avenue	Planned Development Permit and Tentative Parcel Map to subdivide a 1.45-acre lot into three residential lots and construct three single-family residences. Proposal includes a Specific Plan Amendment to Sequoia Heights SP (SP-S-0003-AMD#02) to change designation of subject lot from Residential Estate (RE) to Residential Low Density (RL) and associated textual changes.
20	Barnard St Parcel Map 4850 Barnard Street	Subdivide a 2-acre parcel into three parcels.
21	Stonebridge Outdoor Worship Facility 4832 E Cochran Street 1/2	Modification to existing CUP to add an outdoor worship area with a 613 sq. ft. covered stage area with an attached 388-sq.-ft. storage space, and a 117-sq.-ft. sound booth structure. The outdoor Area includes 292 fixed seats + 6 accessible spaces. Screening wall and loading platform to be located behind storage. New Accessible bathrooms 285 sq. ft. Total 6,800-sq.-ft. modified area and total 1,250 sq. ft. new landscaped area.
22	5005 E Los Angeles Avenue A	Phase 4 which is included in PD-S-526 provides the following improvements: Open grass area for soccer and large public events, parking lot, concession, restroom and storage buildings.
23	City Ventures Oak Rd Residential 1845 Oak Rd	General Plan Amendment, Zone Change, Planned Development Permit, Tentative Tract Map and Affordable Housing Agreement for a new 65-unit townhouse condo project.
24	1807 Oak Rd	Proposed general plan prescreen to change land use from Residential Medium to Residential Moderate for 1801 and 1807 Oak Road.

Table III-1
Related Projects List

Project Number	Location	Description
25	4910 E Cochran St	Expand existing patio cover to 1,672 sq. ft., add 442-sq.-ft. porch, remove parking spaces in front of the main sanctuary building and add/ relocate 2 accessible parking spaces.
26	Habitat for Humanity 3802 Avenida Simi	Construct ten single-family residences including six detached residences and four zero-lot line attached duplex residences on a 38,551-sq.-ft. vacant lot. Includes a General Plan Amendment, Zone Change, Tentative Tract Map, and an Affordable Housing Agreement.
27	The Ridge Apartments 1575 Erringer Rd	Zone Change from CO to RVH and Planned Development Permit to construct a 66-unit apartment building.
28	SB330 2100 Heyneman Ln	Preliminary Review for a 35-lot subdivision for new single-family residences.
29	Montaire HOA Gates Intersection of Kachina Way and Flanagan Drive	Project includes the installation of entry and exit gates at the Indian Terrace Drive/Flanagan Drive intersection and an exit-only gate at the Kachina Way/Flanagan Drive intersection. Project also includes the installation of additional lighting, relocating one tree; and installing a pedestrian gate at each intersection.
30	1305 Royal Ave	Construct 2,116 sq. ft. (46' x 46') detached patio cover on existing patio slab for existing church building.
31	Animal Keeping 5643 Crinklaw Ln	Conditional Use Permit to allow four goats, 20 chickens, four mini-Hereford cows and the boarding of 12 horses in a non-Animal Overlay Residential zone on an existing 3.23-acre lot.
32	4491 E Cochran St	Proposed 22-unit apartment, three-story apartment building on two residential parcels. The two parcels will be merged. The proposed project will include an Affordable Housing Agreement (AHA) for one very low-income unit.
33	City Ventures (Korean Baptist Church) 4868 E Cochran St	PD and Mod to existing CUP-S-434 to develop 26 townhome units.
34	2361 Alamo St	Preliminary review for a 12-lot subdivision for single family homes. Plus, one remainder lot.
Simi Valley Related Projects – Mixed-Use		
1	Alamo/Tapo Mixed-Use 2804 Tapo Street; 4415, 4487, 4473 Alamo Street	Construct a Mixed-Use residential project with 278 apartments, 8,000 sq. ft. commercial, and 30% minimum affordable units with an Affordable Housing Agreement.
2	Santa Susana Mixed Use Project 2196 Tapo St	280-Unit Mixed Use Project.

Table III-1
Related Projects List

Project Number	Location	Description
Simi Valley Related Projects – Commercial		
1	Sycamore Village Plaza TP 2888 to 2986 E Cochran St	Subdivide to create three new parcels in an existing shopping center for financial reasons.
2	Griffin Plaza NW corner of Tapo Canyon Rd and Cochran St	Shopping center remodel.
3	Tapo District Lofts NW corner of Tapo Canyon Rd and Eileen St	Construct a 60 room micro-apartment (Single-room occupancy) complex.
4	BMX Bike Park 998 W Los Angeles Ave	Construct a BMX Bike Park on a 3.24-acre portion of a 21.01-acre parcel owned by the City of Simi Valley
5	Martinez Tinting & Detail 838 E Los Angeles Ave	Construct a 2,302-sq.-ft. commercial building on a vacant 0.14-acre lot.
6	Hacienda Peppertree SW corner of Tapo Canyon Rd and Guardian St	Construct a 357-unit senior residential care facility.
7	Islamic Society of Simi Valley 4343 Township Ave	The project is for the proposed replacement/modification of an existing religious facility including the addition of a second floor. General Plan Amendment from Neighborhood Park to General Commercial. Zone Change from RM to CPD.
8	Fairfield Inn 2585 E Cochran St	A modification to change the hotel room count from 106 rooms to 98 rooms; remove underground parking; modify hotel configuration; and change from three stories to four stories. A Text Amendment to reduce the parking space requirement
9	1070 Country Club 1070 Country Club Dr	Condominium subdivision of 2.26-acre parcel into 1 parcel and 6 condo units.
10	El Patio – Township 4351 Township Ave	Administrative Action for proposed 935-sq.-ft. addition to the outdoor dining patio area at El Patio Restaurant with site modifications.
11	Royal Gas Pump/Canopy Extension 1695 Royal Ave	Increase number of gas station fuel pumps from 4 to 8 and extend existing fuel pump canopy from 729 sq. ft. to 2,430 sq. ft. Includes alterations to landscaping and on-site traffic circulation to accommodate improvements.
12	Panera Bread Drive-Thru 2900 E Cochran St	Conditional Use Permit for addition of Drive-Thru to existing Panera Bread at 2900 Cochran Street.
13	SoCal Gas Addition 977 Chambers Ln	Construct a new single-story commercial 1,375-sq.-ft. addition to the existing Southern California Gas Company building. Paint existing building, pave new accessible parking stalls and construct a new vehicular entry and exit gate on Cochran Street to replace the existing gate.

Table III-1
Related Projects List

Project Number	Location	Description
14	Grocery Store 2631 Tapo Canyon Rd	Proposed remodel of an existing 35,000-sq.-ft. commercial building to a proposed grocery use. The project will include a Tenant Improvement and demising of the premise to allow commercial building to operate as a grocery use. Scope of work includes revising parking lot, redesign of existing loading dock, a new trash enclosure, a new roof plan for mechanical equipment; and exterior remodel.
15	Maronite Church 1059 Ashland Ave	Addition to existing church and new detached canopy with BBQ. 1,000-sq.-ft. addition to hall, 616 sq. ft. for two bathrooms and a storage area, new 336-sq.-ft. open trellis, and a new 578-sq.-ft. covered patio. New 770-sq.-ft. detached canopy.
16	Simi Auto Spa and Speed Wash Vacuum Stall Canopies 1144 E Los Angeles Ave	Demolish 4,466 sq. ft. of vehicle service bays and construct 1,860-sq.-ft. vacuum canopy in their place and another 1,530-sq.-ft. vacuum canopy at an existing car wash.
17	Chick-Fil-A Canopy Addition 2460 Sycamore Dr	Construct one 1,028-sq.-ft. steel canopy and another 437-sq.-ft. canopy over an existing Chick-Fil-A drive thru.
18	Costco Fuel Expansion 2660 Park Center Dr	To allow for the expansion of an existing Costco Gasoline fueling facility, including a 4,208-sq.-ft. fuel canopy expansion (9,053 sq. ft. total) with five (5) new multi-product dispensers (MPDs), one (1) 30,000-gallon underground storage tank, four (4) underground remote fills, a new controller enclosure, new transformer, and associated site improvements. Specific site improvements include directional ground painting, landscaping, and parking areas.
19	Dunkin' Donuts 1377 E Los Angeles Ave	Design and use modifications to approved PD-S-238 Adj. #12 to include drive through coffee shop in conjunction with credit union ATM drive through; modification to parking and landscaping.
20	El Capitan 2982 E Los Angeles Ave	To add an outdoor dining area to an existing restaurant with the removal of 717.5 sq. ft. of landscaping.
21	5135 E Los Angeles Ave	Small recycling buyback center (500 sq. ft.) next to Smart & Final
22	Everhome Hotels 1708 Simi Town Center Way 1/2	Proposed 114-room, 57,79-sq.ft., four-story hotel, with 116 parking spaces.

Table III-1
Related Projects List

Project Number	Location	Description
23	Training Facility 591 Country Club Dr B	The request includes a Conditional Use Permit (CUP) to construct a training facility for baseball and softball instruction at an existing, single-story, 13,939-sq.-ft. commercial tenant building within an existing 74,306-sq.-ft. retail center. Proposed Tenant Improvements include 10 hitting/pitching cages, a pro-shop, office, lounge, party/conference lounge, instructor' lounge, storage closets, and restrooms. Exterior improvements include storefront modifications, a second door (egress) and wall-mounted signage.
24	525 E Los Angeles Ave	Preliminary Review for a lot line adjustment, 950-sq.-ft. drive-thru coffee shop, and a 4,800-sq.-ft. carwash on two vacant parcels.
25	Popeyes 2401 Tapo Canyon Rd	Preliminary review to construct a new 1,885-sq.-ft. building with drive-through. Tenant will be a new Popeye's Chicken Restaurant. New site improvements.
26	Grace Brethren Parcel Map 1350 Cherry Ave	CUP Modification to extend CUP use for 1350 Cherry Avenue onto new parcel at 2369 Royal Avenue (Refer to TP-S-2023-0003).
27	Grace Brethren Parcel Map 2369 Royal Ave	Parcel map to subdivide 3.85-acre parcel into two parcels.
28	1268 Madera Rd	A small recycling collections facility for an existing retail center.
29	2001 Donville Ave	Addition of two new carports to an existing auto-body shop.
30	3200 E Cochran St	Preliminary review for existing YMCA to include site modifications.
31	2811 E Cochran St	To operate a banquet facility within an existing 5,287-sq.-ft. commercial tenant space.
32	6691 Smith Rd	Proposed movie studio expansion.
33	2706 E Los Angeles Ave	Construct fast food restaurant addition to existing gas station.
34	CUP-S-2024-0003/SP-S-2024-0001 20 W Cochran St	Drive through restaurant.
Simi Valley Related Projects – Industrial		
1	All Valleys RV Storage 850 W Los Angeles Ave	Expand an existing RV storage yard to the south portion of the lot. 64 new spaces added to existing 385 spaces.
2	Pre-con Recycling 240 W Los Angeles Ave	Construct and operate a concrete recycling and concrete product storage yard.

Table III-1
Related Projects List

Project Number	Location	Description
3	Adams Bennett Concrete Batch Plant 400 W Los Angeles Ave	Ready-Mix and Precast Concrete products facility with related sand, gravel, Portland cement and concrete mixtures storage with periodic recycling of concrete along with material deliveries into and out of facility.
4	Smith Road Movie Studio Backlot Vacant lot west of 6700 Smith Rd	Construct a movie studio backlot and Master Plan for future movie studio building.
5	Xebec Easy Street North of East St, E of Madera Rd	Construct six industrial buildings on a vacant lot.
6	Irons Contractor Storage 744 W Los Angeles Ave	Re-entitle expired contractor storage yard approval CUP-S-686 with wildlife movement corridor; Improvement construction will be in two phases: (1) the existing contractor yard and (2) the south contractor yard with wildlife movement corridor.
7	4M Precision Grinding 600 E Easy St	Construct a 9,500-sq.-ft. industrial building on a vacant lot.
8	Industrial Building 2240 First St	Construct a 10,133-sq.-ft. single-story industrial building on a vacant lot.
9	Parkinson Development 600 E Cochran St	Construct a 37,324-sq.-ft. single-story concrete tilt up industrial building with 6,500 sq. ft. of mezzanine.
10	Rancho Simi Recreation and Park District 4201 Guardian St	Addition of a 5,040-sq.-ft. mezzanine space and reconfiguration of recreational areas for Phase 3 of CUP-S-785. Mezzanine area would only be open after hours. Changes are limited to internal modifications.
11	555 E Easy St	Construct a 17,000-sq.-ft. addition to an existing industrial building.
12	Entertainment Earth 903 Quimisa Dr	Construct a 205,367-sq.-ft. tilt up building on a 13.13-acre site for Warehouse, Distribution and Office.
13	615 W Los Angeles Ave	New single-story, industrial tilt-up building with a partial mezzanine. Total square footage of 68,162 sq. ft. Warehousing/manufacturing for bakery food ingredients.
14	861 E Cochran St	The proposed project will consist of a single-story industrial building with a total square footage of 24,290 sq. ft. New off-street parking. Adjacent yard to store manufactured storage units.
15	CUP-S-2023-0013 4100 Guardian St	Demolition of existing office building to build new 179,000-sq.-ft. (+/-) industrial building.

Table III-1
Related Projects List

Project Number	Location	Description
16	Tierra Rejada Road.	Preliminary review for Butler Ranch. Approx. 587 acres of vacant land. Out of this, approx. 63 acres are situated in the City of Simi Valley and the rest in unincorporated Ventura County. The project is divided into two phases. Phase I: the 63-acre parcel in the City will be utilized as a short-term outdoor contractor storage area. This will involve parking of trucks, equipment, and trailers before the construction of industrial buildings. Phase II: The City parcel will be developed to include four to six industrial buildings. The size of these buildings will range between 45,000 sq. ft. and 225,000 sq. ft., with a total area of approximately 725,000 sq. ft. Additionally, the City portion of the site will also include an approximately 20-acre access parcel that will provide access to the commercial site from Tierra Rejada Road.
17	Waste Management Industrial Building	The project proposes a 637,500 square foot industrial warehouse with office space, drive aisles, parking, hardscaping, and landscape.
Los Angeles City Related Projects		
1	9503 N. Andora Place, Chatsworth	44-lot subdivision, with 42 lots for residences and equestrian use and 2 lots for open space on a 91-acre parcel.
2	6400 N. Platt Ave, West Hills	Zone change from C-1 to C-4.
3	22650 W. Sherman Way, West Hills	Parcel Map Adjustment to allow extension of a private road to create a hammerhead turnaround.
4	5330 N. Ponce Avenue, Woodland Hills	Conditional Use Permit for alcoholic beverage sales as part of a 25,014 sq. ft. grocery store open from 6:00 am to 10:00 pm daily.
5	23388 W. Mulholland Drive, Woodland Hills	Modification to Parcel Map to amend a condition of approval regarding sidewalk improvements.
6	21815 W. San Jose Street, Chatsworth	Tract Map to subdivide one lot into 5 lots and construct single-family dwellings.
7	21725 W. Devonshire Street, Chatsworth	Conditional Use Permit for sale and service of beer and wine for off-site consumption in conjunction with a café.
8	21551 W. Prairie Street, Chatsworth	Certificate of Compliance for APN 2746-014-022 with no grading or physical development.
9	22744 W. Roscoe Boulevard, West Hills	Conditional Use Permit for sale and service of alcohol for onsite consumption at an existing restaurant.
10	22825 W. Roscoe Boulevard, West Hills	Site Plan Review for construction of a 96,614-sq.-ft. light industrial development with three buildings and a 45-ft. maximum height.

Table III-1
Related Projects List

Project Number	Location	Description
11	8240 N. Melba Avenue and 8427 N. Joan Lane, West Hills	Lot Line Adjustment between two parcels due to existing encroachment.
12	22937 W. Jensen Drive, West Hills	Parcel Map to create 3 new lots with a mid-point lot width of 20 ft. and a reduced area of 10,002 sq. ft.
13	10801 N. Andora Avenue, Chatsworth	Plan Approval to extend 10-year Zone Variance grant.
14	10824 N. Topanga Canyon Boulevard, Chatsworth	Conditional Use Permit for childcare facility with up to 94 children.
15	22140 W. Chatsworth Street, Chatsworth	Parcel map to subdivide one lot into three parcels.
16	10208 N. Topanga Canyon Boulevard, Chatsworth	Transit-Oriented Communities Review and Devonshire Topanga Specific Plan Review for new 21-unit residential building.
17	9777 N. Topanga Canyon Boulevard, Chatsworth	Design Review Board review of exterior remodel and exterior elevator for an existing hotel.
18	23701 W. Vanowen Street, West Hills	Conditional Use Permit for sale and dispensing of beer and wine for offsite consumption in conjunction with an existing 3,600-sq. ft. 7-Eleven convenience market, operating 24 hours.
19	7500 N. Chaminade Avenue, West Hills	Conditional Use Permit, Site Plan Review, Yard and Building Line Adjustment, and Zone Variance to allow continued operation and expansion of a high school.
20	23475 and 23485 W. Long Valley Road, Woodland Hills	General Plan Amendment, Merger, Tract Map, and Site Plan Review for 121-lot residential subdivision (26 single-family lots, 95 small-lot homes) and development of an assisted living care and memory care facility, to replace an existing nursery.
21	23838 W. Kittridge Street, West Hills	Conditional Use Permit for wireless facility.
22	22815 W. Roscoe Boulevard, West Hills	Amendment to conditions to relocate 250,000 sq. ft. of floor area, reduce floor area and building height, and eliminate a park structure.
Los Angeles County Related Projects		
1	Deer Lake Highlands 1 Saugus Road, Chatsworth APN: 2819-007-023	Phased residential subdivision consisting of 314 single-family residential units, one recreation building, one Sheriff's Dept. facility and 31 open space/slope lots located approx. 232.87 acres in the hills northeast of Topanga Canyon Blvd. 41 of the lots would be authorized for equestrian use.

Table III-1
Related Projects List

Project Number	Location	Description
2	24668 Woolsey Canyon Road, Chatsworth APN: 2017-007-011	Conditional Use Permit and Discretionary Oak Tree Permit to authorize a previously unpermitted agricultural / equestrian pad in a Significant Ecological Area, and to authorize grading, a new equestrian use, and an orchard.
3	West end of Welby Way and Kittridge Street, West Hills APN: 2031-015-011	Conditional Use Permit and Oak Tree Permit to develop 25 single-family residential lots, one open space lot, one recreational lot, one public facilities lot, and one water tank lot on 58.03 acres.
4	6467 Chesebro Road, Agoura APN: 2055-029-007	Conditional Use Permit to authorize construction of a two-story single-family dwelling with detached accessory dwelling unit.
5	6601 Valley Circle Boulevard, West Hills APN: 2031-018-010	Zone Change and Tract Map for a single-family residential development.
Calabasas Related Projects		
1	25801 Thousand Oaks Boulevard	15,000-sq.-ft. fully inclusive play space with unique features that promote creativity and cognitive development at an existing public park (Gates Canyon Park).
2	NW corner of Las Virgenes Road and Thousand Oaks Boulevard	Modification to a Conditional Use Permit to reduce office buildings from 2 stories to 1 story, reducing square footage by 15,274 sq. ft.

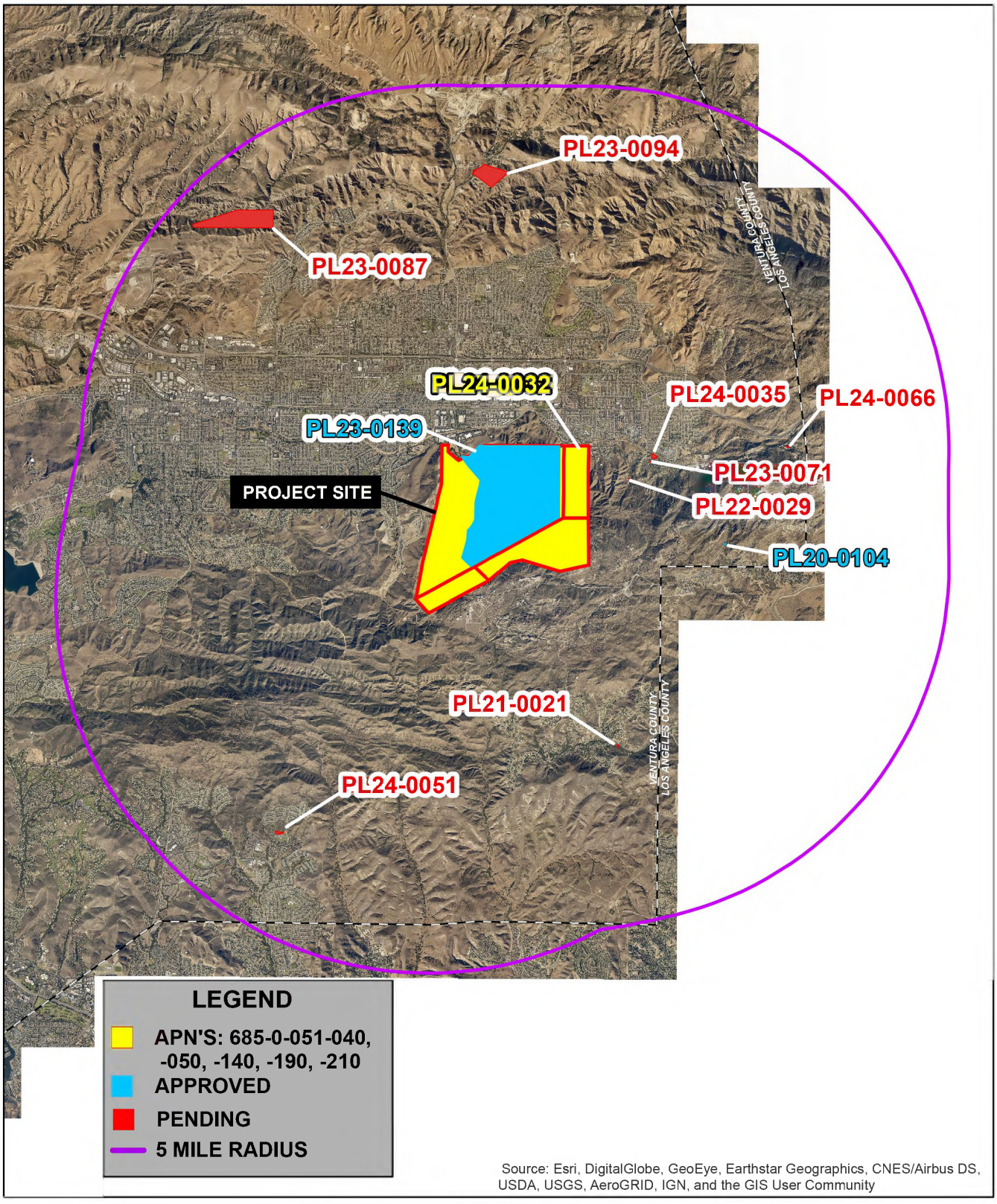


Figure III-3
Ventura County Related Projects Location Map

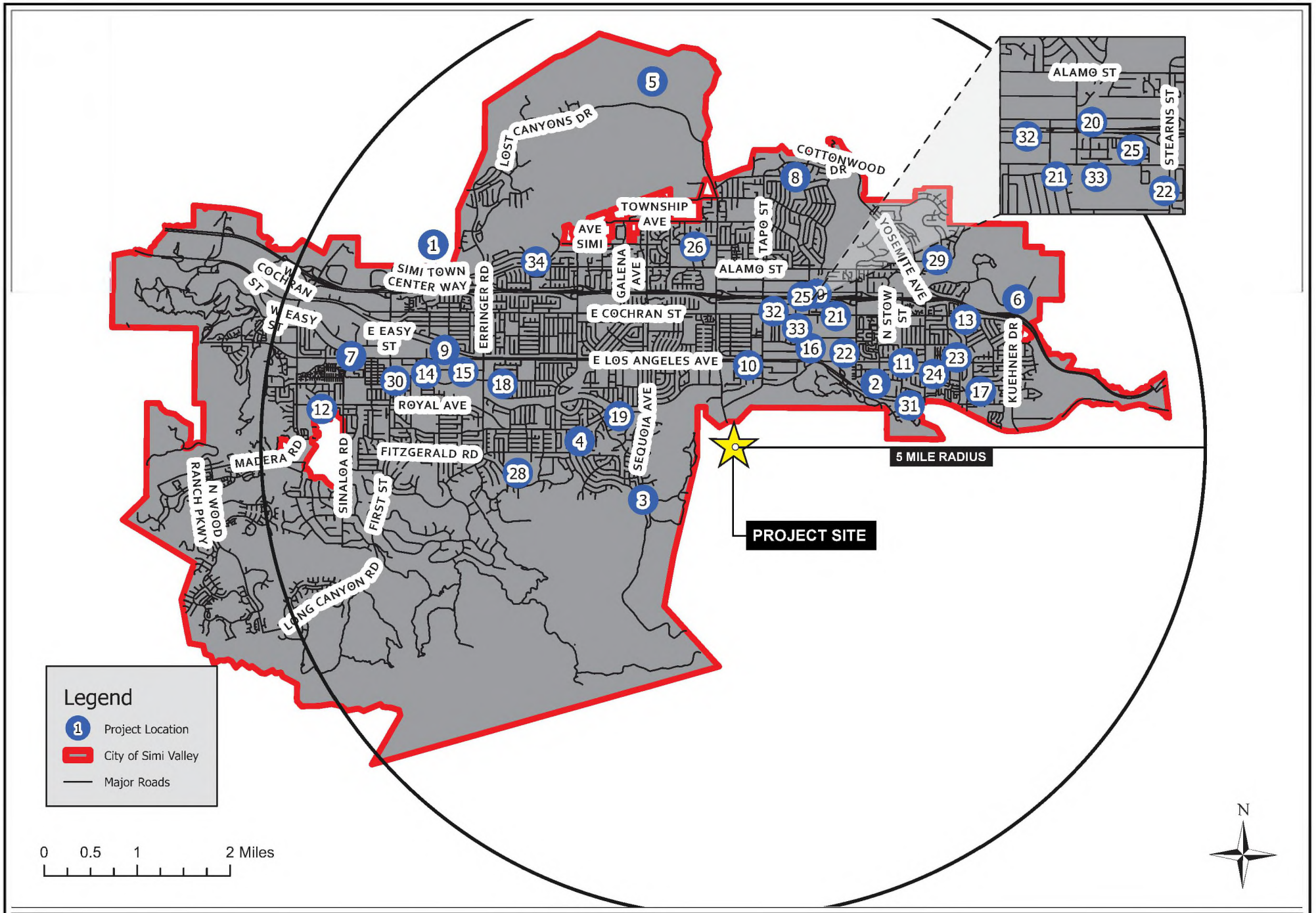


Figure III-4
Simi Valley Related Projects Location Map - Residential

Source: City of Simi Valley California, 2025.

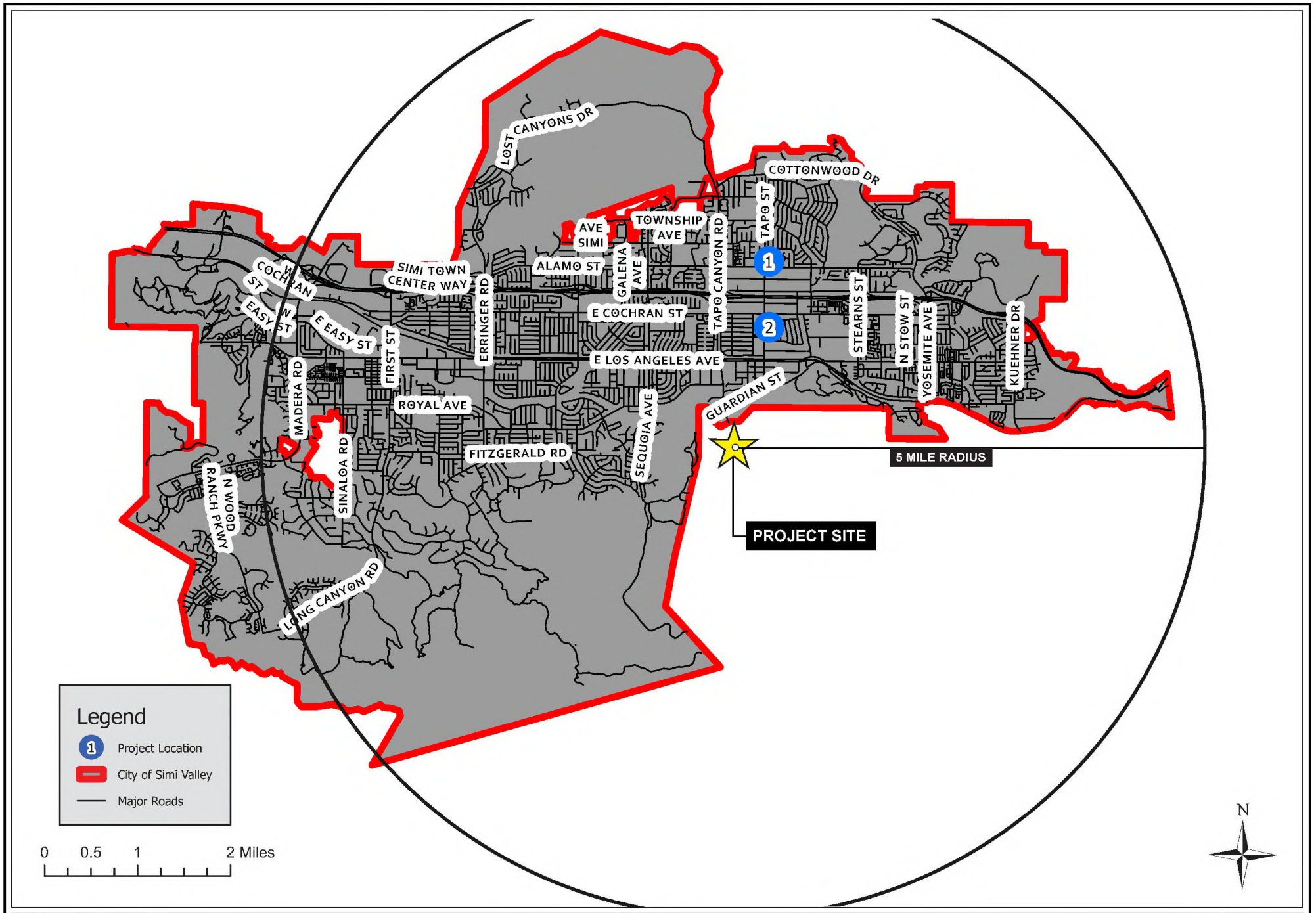


Figure III-5
Simi Valley Related Projects Location Map - Mixed-Use

Source: City of Simi Valley California, 2025.

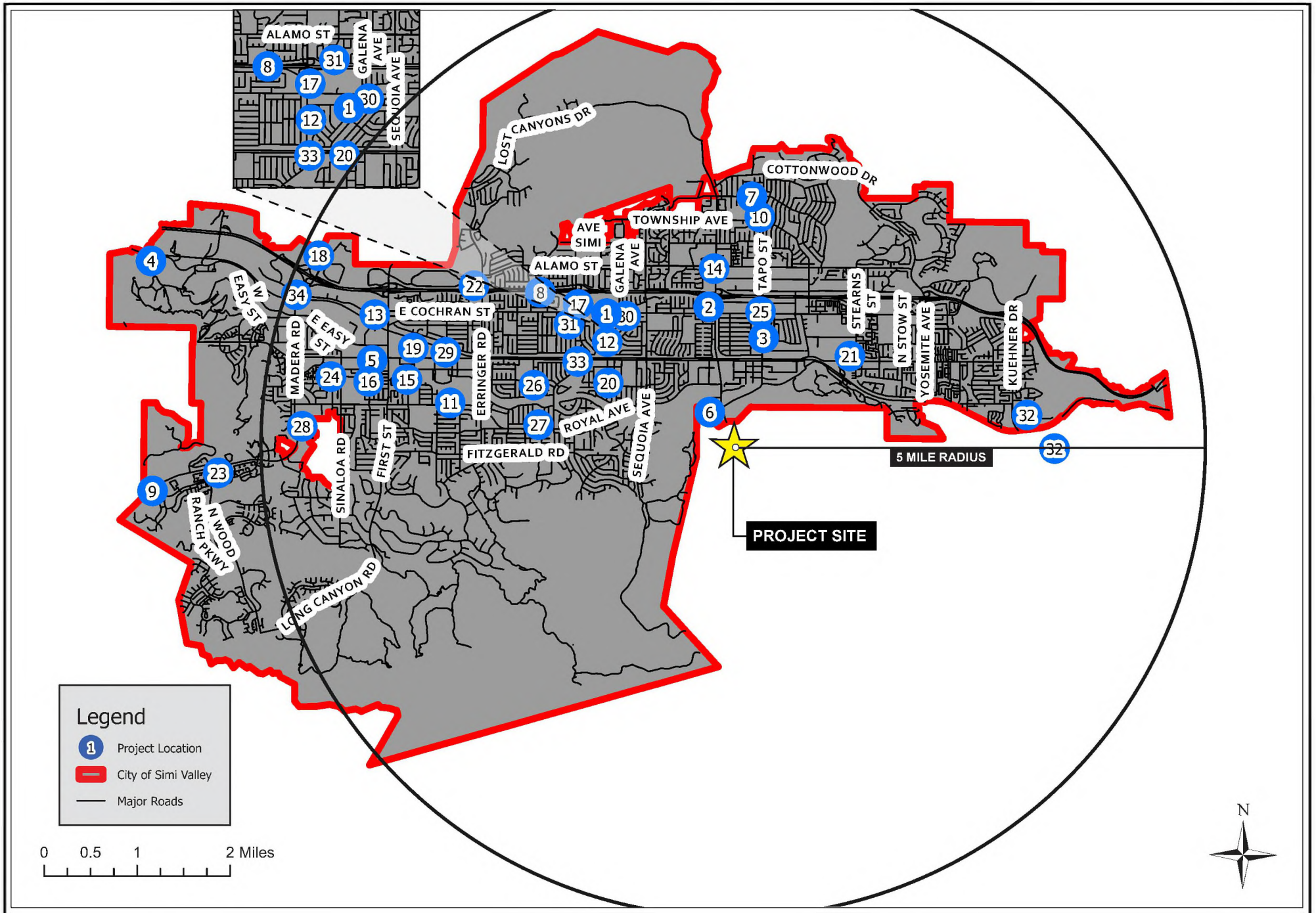


Figure III-6
Simi Valley Related Projects Location Map - Commercial

Source: City of Simi Valley California, 2025.

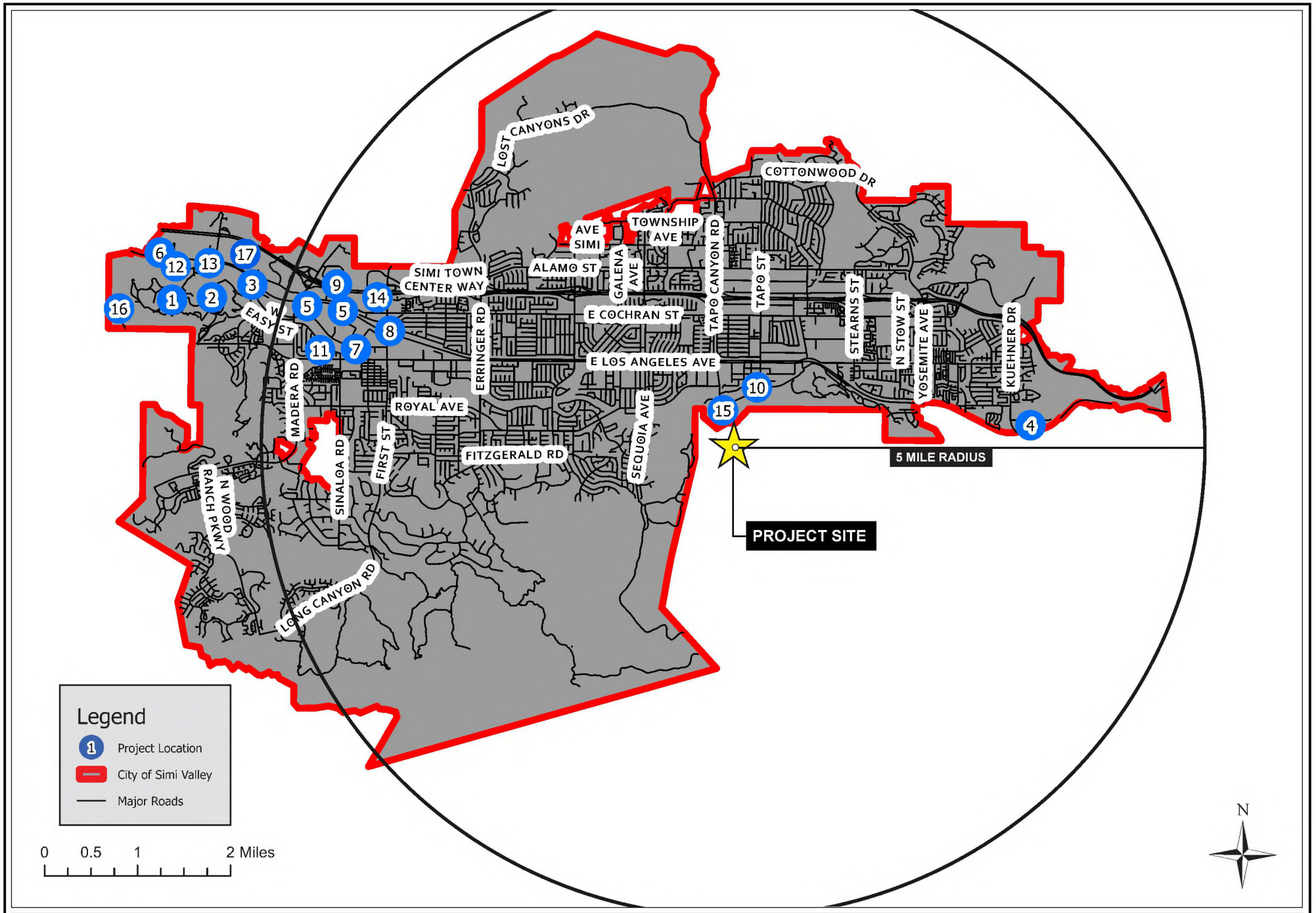
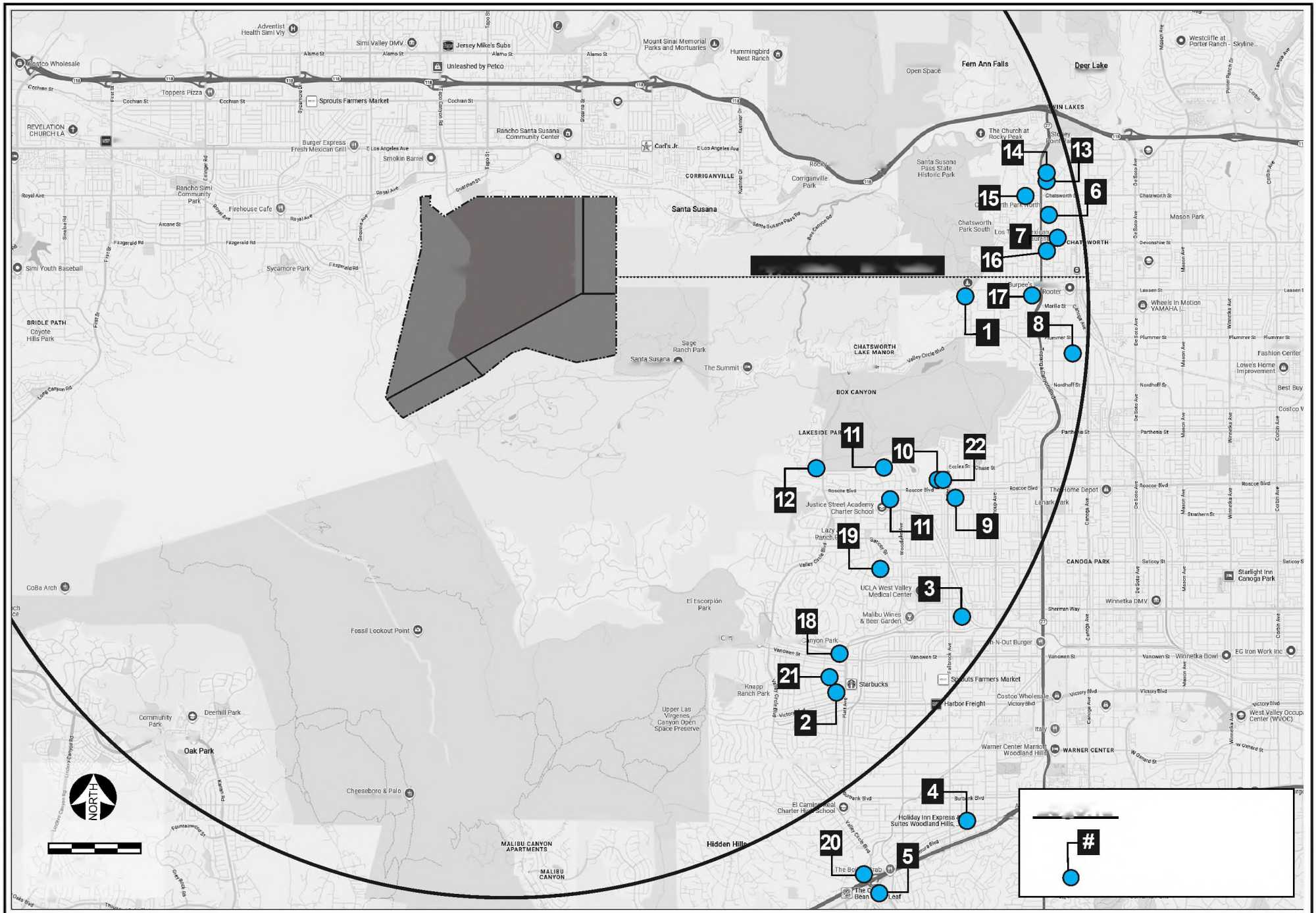


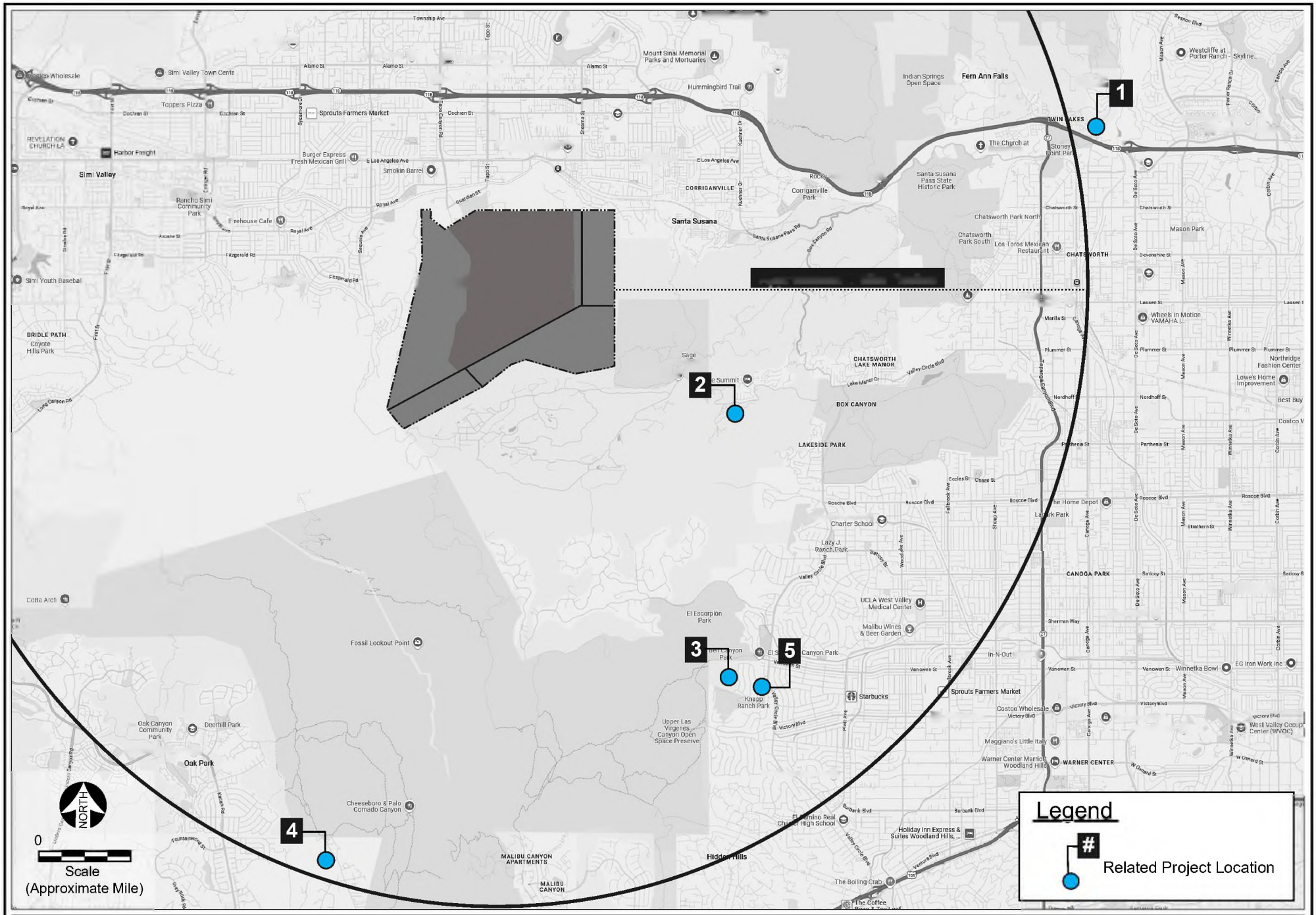
Figure III-7
Simi Valley Related Projects Location Map - Industrial

Source: City of Simi Valley California, 2025.



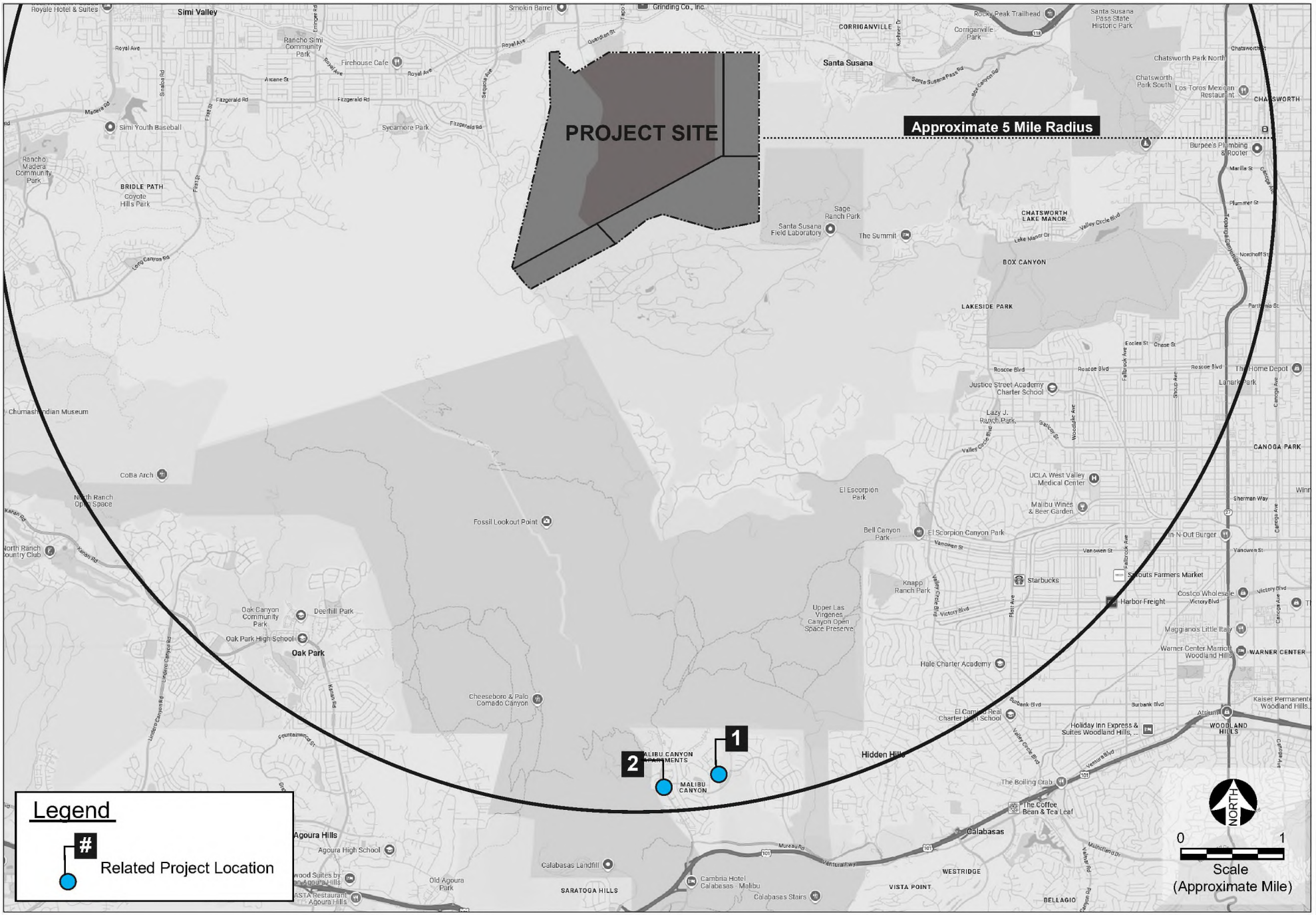
Source: Google Maps, 2025.

Figure III-8
Los Angeles Related Projects Location Map



Source: Google Maps, 2025.

Figure III-9
Los Angeles County Related Projects Location Map



Source: Google Maps, 2025.

Figure III-10
Calabasas Related Projects Location Map

IV.A IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

In addition to the environmental impact categories analyzed in detail in this EIR, the County has determined that the development and operation of the Project would not result in potentially significant impacts to the environmental impact topics discussed below. Section 15128 of the CEQA Guidelines states the following:

> *An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study.*

It has been determined that there is no evidence that the Project would cause significant environmental effects in the following areas and that no further environmental review of these issues is necessary:

- Aesthetics — Threshold d)
- Agricultural and Forestry Resources — Thresholds c) and d)
- Geologic Hazards — Thresholds b), e), f), and h)
- Hazards and Hazardous Materials — Threshold e)
- Land Use and Planning — Thresholds a) and b)
- Mineral Resources — Thresholds a) and b)
- Population and Housing — Thresholds a) and b)
- Public Services — Thresholds c), d), and e)

Note: The threshold letters listed above refer to the threshold letters in Appendix G of the CEQA Guidelines.

a) Aesthetics

d) The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Project Site. The Project Site is currently developed with the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. The Project includes the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and

landscaping improvements around the new structures, all within the footprint of existing camp development. Any additional light and glare generated by the proposed facilities would be similar to existing levels of light and glare currently occurring from existing development on the Project Site and would not be visible beyond the Project boundaries based on the distance from the Project Site to any surrounding uses. Therefore, Project impacts with respect to light and glare would be less than significant.

b) Agricultural and Forestry Resources

c) The Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No mitigation measures are required, and Project impacts would be less than significant.

While most of the Project Site is zoned Open Space (OS-160 ac.), the 328-acre portion where camp facilities are located are on land zoned Rural Agricultural (RA-160 ac.). The Project Site is not zoned for forest land or timberland. In addition, as described above, the existing trees that would be removed as part of the Project are not considered forestry resources, and no other trees or forestry resources would be impacted by the Project. Therefore, no impacts related to this issue would occur as a result of the Project.

d) The Project would not result in the loss of forest land or the conversion of forest land to non-forest use. timberland. No impacts related to this issue would occur as a result of the Project, and mitigation measures are required.

As discussed above under subsection c), the Project Site is not zoned for forest land and there are no forestry resources on the Project Site. Thus, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Geologic Hazards

b) The Project would be designed in accordance with all applicable requirements of the Ventura County Building Code.

A significant impact may occur if a project would not be designed in accordance with all applicable requirements of the Ventura County Building Code. The Project would be required by the County to be designed and constructed in accordance with all applicable Ventura County Building Code requirements. Therefore, no impacts related to this issue would occur as a result of the Project.

e) The Project would not be located within 10 to 20 feet of vertical elevation from an enclosed body of water, resulting in the potential for seiches to occur at the Project Site.

A significant impact may occur if a project would be located within 10 to 20 feet of vertical elevation from an enclosed body of water, resulting in the potential for seiches to occur at the project site. The closest body of water of significance to the Project Site is Bard Reservoir, located about six miles southwest of the site. Thus, hazards associated with seiches at the Project Site are

considered low. Therefore, no significant impacts related to this issue would occur as a result of the Project.

f) The Project would not be located within a mapped area of tsunami hazard as shown on County General Plan maps.

A significant impact may occur if a project would be located within a mapped area of tsunami hazard as shown on County General Plan maps. The Project Site is located within a mapped area of tsunami hazard. Therefore, no impacts related to this issue would occur as a result of the Project.

h) The Project would not result in impacts associated with the use of septic tanks.

A significant impact may occur if a project included use of septic tanks within soils incapable of supporting septic tanks. The Project would not use septic tanks. The Project would use the existing wastewater infrastructure that currently serves the site. Therefore, no impacts related to this issue would occur as a result of the Project. **d) Hazards and Hazardous Materials**

e) The Project Site is not located near any airports. Therefore, no impacts related to aviation hazards would occur.

The airport closest to the Project Site is the Van Nuys Airport located approximately 13 miles east of the site. Thus, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, no impacts related to aviation hazards would occur as a result of the Project.

e) Land Use and Planning

a) The Project would not physically divide an established community.

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is currently developed with the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. The Project includes the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures, all within the footprint of existing camp development. As such, the Project would not be of a density or scale to constitute a physical barrier separating an established community, and no impact would occur.

b) The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

While most of the Project Site is zoned Open Space (OS-160 ac.) and designated in the Open Space land use category, the 328-acre portion where camp facilities are located in zoned Rural Agricultural (RA-160 ac.) and carries a Rural land use category. The Project involves the development of additional facilities to an existing camp development, that are consistent with the existing zoning and General Plan land use designation for the Project Site. Therefore, the Project would result in no impact with respect to land use and planning.

f) Mineral Resources

a) The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. While most of the Project Site is zoned Open Space (OS-160 ac.) and designated in the Open Space land use category, the 328-acre portion where camp facilities are located in zoned Rural Agricultural (RA-160 ac.) and carries a Rural land use category. The Project would not affect any part of the property that is within the MRP (Mineral Resource Protection) overlay zone, nor would the Project affect access to any regionally-important mineral resource. The Project includes the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures. In order to accommodate the proposed development, three housing trailers, two cottages, and a garage would be demolished. The new development would be located within the footprint of existing camp development, and as such, the Project would have no impact with respect to loss of availability of a known regionally important mineral resource.

b) The Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

A significant impact may occur if a project is located in an area used or available for extraction of a locally important mineral resource, such as oil, gas, sand, or gravel, and if the project converted an existing or potential future locally important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. The Project Site is not in an oil/gas field and there are no mineral extraction activities that currently occur on the Project Site or in the vicinity of the Project Site. In addition, the new development proposed would be located within the footprint of existing camp development and the Project would not affect any part of the property that is within the MRP overlay zone.

Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur.

g) Population and Housing

a) The Project would not induce substantial unplanned population growth in an area, either directly or indirectly.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the expansion of an existing recreational camp facility. The Project does not include development of any residential uses, would not increase the number of residents in the Project Site area. In addition, the proposed physical improvements would not increase the employment at the Project Site such that it would induce substantial population growth and/or require permanent housing, as no change in the number of employees and staff is proposed. In addition, the Project Site is already served by an existing roadway network and utility and public services infrastructure. While the Project includes enhanced infrastructure for the Brandeis-Bardin Mutual Water Company (BBMWC), the BBMWC only serves the Project Site, and the upgrades would only be designed to serve the Project Site. The Project does not include the development of any new or extended roadways or other infrastructure that would be growth-inducing. Therefore, the Project would not indirectly or directly induce substantial population growth, and Project impacts related to population growth would be less than significant.

b) The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating construction of replacement housing elsewhere. The Project Site is currently developed with the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. As shown on Table II-1 (in Section II, Project Description, of this Draft EIR), the Project includes demolition of some of the existing housing trailers. However, the demolition of these housing trailers would not displace any staff who live on the Project Site, as these staff members would be accommodated elsewhere on the property. In addition, the Project would not eliminate any affordable housing, result in increased housing

demand, or result in any additional full-time employees. Therefore, the Project would not displace substantial numbers of housing or residents, necessitating the construction of replacement housing elsewhere, and therefore, no impact would occur.

h) Public Services

c) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.

A significant impact may occur if a project results in the need for new or expanded government facilities, the construction of which would result in environmental impacts. The Project includes expansion of an existing recreational camp facility, authorization for an additional 100 campers, and an increase in attendance and frequency of events, and thus, would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees to Simi Valley Unified School District, payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

d) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks.

A significant impact may occur if a project results in the need for new or expanded government facilities, the construction of which would result in environmental impacts. The Project includes expansion of an existing recreational camp facility, authorization for an additional 100 campers, and an increase in attendance and frequency of events. The expanded camp facility could help fulfill the recreational needs of the community. The Project does not include development of any residential uses, would not increase the number of residents in the Project Site area, would not increase staff population or year-round residences, and would not create an increased demand for parks and recreational facilities, including trails, associated with a residential population. The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, including trails, such that substantial physical deterioration of the facility would occur or be accelerated. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and no impact would occur.

e) The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which

could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities.

A significant impact may occur if a project results in the need for new or expanded government facilities, such as libraries or government offices, the construction of which would result in environmental impacts. The Project includes expansion of an existing recreational camp facility, authorization for an additional 100 campers, and an increase in attendance and frequency of events and therefore would not generate a population that would result in additional demand for library or other governmental facilities. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and no impact would occur.

IV.B AESTHETICS (Scenic Resources)

This section provides an evaluation of impacts on scenic resources as a result of the Project.

1. Regulatory Setting

a) State

i) California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, Section 260 et seq. The intent of the system is to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation measures. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. Within Ventura County, Highway 33 is designated as a State Scenic Highway north of Ojai.[1] Note that while sections of State Route 1, State Route 118, and US Highway 101 along the Ventura County coast are listed as "eligible" for scenic highway designation in the Scenic Highway System List, they do not fit the CEQA criteria for State scenic highways. In addition, according to the California Department of Transportation, there are no officially designated County scenic highways in Ventura County.[2]

[1] California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways, https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx, accessed June 18, 2024.

[2] Ibid.

b) Regional

i) Ventura County General Plan

The Land Use and Community Character Element of the County's General Plan contains the following policies regarding community character:

LU-16.1 Community Character and Quality of Life

The County shall encourage discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses.

LU-16.10 Visual Access for Rural Development

The County shall encourage discretionary development in rural areas to maintain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk.

The Conservation Element of the County's General Plan contains the following goal and policies regarding scenic resources:

COS-3.1 Scenic Roadways

The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.

COS-3.2 Tree Canopy

The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county, especially those located within designated disadvantaged communities.

COS-3.3 Utility Undergrounding Priority

The County shall give overhead utility undergrounding within high fire hazard areas and Scenic Resource Areas first priority when allocating County Utility Undergrounding Funds.

COS-3.4 Visual Impacts from Reservoirs

The County shall ensure that reservoirs are not sited on prominent ridgelines and that new reservoirs are well-screened with native vegetation and berms and, if possible, are undergrounded.

COS-3.5 Ridgeline and Hilltop Preservation

The County shall ensure that ridgelines and major hilltops remain undeveloped and that discretionary development is sited and designed to remain below significant ridgelines, except as required for communication or similar facilities.

COS-3.6 Open Space Character

The County shall require discretionary development outside of Existing Communities be planned and designed to maintain the scenic open space character of the surrounding area, including view corridors from highways. Discretionary development should integrate design, construction, and maintenance techniques that minimize the visibility of structures from public viewing locations within scenic vistas.

A. Scenic Resource Protection Areas

Scenic resource areas consist of viewsheds of lakes and State and County designated scenic highways, and other scenic areas as may be identified in an area plan. The County lakes included in this definition are Lake Casitas, Lake Matilija, Lake Piru, and Lake Sherwood.

ii) Ventura County Initial Study Assessment Guidelines

As defined in the Ventura County Initial Study Assessment Guidelines (ISAGs), scenic resources consist of aesthetically pleasing natural physical features that are viewable from public locations. Scenic resources include lakes, beaches, dunes, rivers, creeks, bluffs, mountains, ridgelines, hillsides, native habitat (e.g., wetlands, oak woodlands, and coastal sage chaparral habitat), and rock outcroppings.

2. Environmental Setting

a) Regional

According to the Conservation Element of the County's General Plan, the County contains aesthetic features that continue to attract visitors and provide pleasure to residents. The County is dedicated to conservation of these resources and ensuring visual access to them. Conservation of aesthetic resources is most critical where they will frequently be viewed, such as in proximity to a highway or a residential area. From panoramic views of the Santa Monica Mountains in the south to northern vistas of the Topa Topa mountain range in the Los Padres National Forest and scenic views of coastal beaches and cliffs in the west, Ventura County offers a variety of scenic resources.

b) Project Site

The Project Site is located in the Simi Hills immediately south of the City of Simi Valley on the eastern flanks of Meier Canyon that is a tributary to the Arroyo Simi drainage channel, located

approximately 0.75 miles north of the Project Site. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses, which are located within a 328-acre portion of the 2,558-acre Subject Parcels. The developed portion of the Project Site consists of the west sloping surface between Peppertree Lane and the main canyon bottom. This area consists of a broad surface elevated above the main canyon bottom to the west. Two tributary canyons pass through the Project Site before entering Meier Canyon. One of the tributaries is located along the northern portion of the Project Site and one passes through the central part of the Project Site. The two tributary canyons continue to ascend to the east and above the Project Site.

The camp's physical setting is defined by its placement at approximately 1,000 feet above mean sea level (amsl) in a natural canyon landscape, surrounded by rolling hills, oak woodlands, and chaparral-covered slopes. The topography is varied, with gentle valleys giving way to steeper ridgelines rising to approximately 1,500 feet above mean sea level (amsl) that enclose the camp and create a sense of privacy and immersion in nature, making the camp largely hidden from external vantage points. Its location within the canyon provides both physical and visual seclusion from neighboring areas and roadways. From higher elevations in the surrounding terrain, the camp's facilities are not readily visible due to intervening topography and vegetation.

The camp is characterized by the developed portion, which is dedicated to organized camp activities for kids and teens with cabins, dining hall, administration buildings, ropes courses, archery ranges, climbing walls, equestrian facilities, sports fields, and pools, while surrounded by conservation areas and open space, including large tracts of oak woodland, chaparral, and grassy meadows, that buffer the camp from off-site uses.

Beyond the buffer area, off-site land uses closest to the camp generally include a business park and other typical suburban development associated with the City of Simi Valley located north of the camp. Otherwise, the camp is remote.

The Project includes the development of additional facilities at Camp Alonim, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures. In order to accommodate the proposed development, three housing trailers, two cottages, and a garage, would be demolished.

3. Impact Analysis

a) Thresholds of Significance

The analysis of scenic resources impacts considers criteria identified in the CEQA Guidelines Appendix G Environmental Checklist for Aesthetics and uses the following significance thresholds from the County's ISAGs.

i) ISAGs: Scenic Resources

1. A project has the potential to create a significant impact to scenic resources if it:

    a. Is located within an area that has a scenic resource that is visible from a public viewing location; and
    b. Would physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects; or
    c. Would substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects.

2. Any project that is inconsistent with the policies of the Ventura County General Plan related to scenic resources will result in a potentially significant environmental impact.

ii) ISAGs: Community Character

A project has the potential to create a significant impact related to community character if the project is inconsistent with any of the policies or development standards relating to community character of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan.

iii) Appendix G of the CEQA Guidelines

A project could have a significant impact if the project would:

a) Have a substantial adverse effect on a scenic vista.
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points.)
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Appendix G thresholds a) through c) are discussed below. A discussion of threshold d) is included in Section IV.A, Impacts Found to be Less Than Significant, of this Draft EIR.

b) Project-Specific Impacts

Impact AES-1: The Project would not have a substantial adverse effect on a scenic vista. No mitigation measures are required, and Project impacts would be less than significant.

While the larger 2,558-acre Project Site contains ridgelines that are viewable from surrounding public vantage points, camp facilities are located within a 328-acre portion in the interior of the Project Site, within a canyon, and are not viewable from public vantage points., the closest of which is the business park located approximately 0.5 miles north of the Project Site. The camp's physical setting is defined by its placement at approximately 1,000 feet above mean sea level (amsl) in a natural canyon landscape, surrounded by rolling hills, oak woodlands, and chaparral-covered slopes. The topography is varied, with gentle valleys giving way to steeper ridgelines rising to approximately 1,500 feet amsl that enclose the camp and create a sense of privacy and immersion in nature, making the camp largely hidden from external vantage points. Its location within the canyon provides both physical and visual seclusion from neighboring areas and roadways. From higher elevations in the surrounding terrain, the camp's facilities are not readily visible due to intervening topography and vegetation. The physical changes proposed by the Project, including the Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures would be located within the footprint of existing camp development and would have maximum heights of 17 feet. Thus, like the existing camp facilities on the Project Site, the additional facilities included as part of the Project would likewise not be viewable from a public viewing location. In addition, according to the General Plan Resource Protection Map, the Project Site is not located within a Scenic Resource Area. Therefore, the Project would not have a substantial adverse effect on a scenic vista, nor would the Project alter a scenic resource from a public viewing location.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AES-2: The Project would not substantially damage scenic resources within a state scenic highway. No mitigation measures are required, and no impact would occur.

The closest designated State scenic highway is Highway 33, which is located over 30 miles from the Project Site. The closest eligible designated State scenic highway is a segment of State Route 118, located approximately 2 miles north of the Project Site. Due to distance and/or intervening topography and development, the Project Site is not located within view from a State scenic

highway.[3] Therefore, the Project would not have the potential to substantially damage scenic resources within a State scenic highway.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AES-3: The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. No mitigation measures are required, and Project impacts would be less than significant.

As discussed in Section II, Project Description, of this Draft EIR, a camp has been operated on the Project Site since 1947, and there are currently 117 existing structures associated with the camp on the Project Site, totaling approximately 208,000 square feet (sq. ft.). The Project includes the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures. In order to accommodate the proposed development, three housing trailers, two cottages, and a garage would be demolished. The new development would be located within the footprint of existing camp development and would have maximum heights of 17 feet. Due to the remoteness and seclusion of the camp in relation to the closest potential public vantage point to the site (i.e., the business park located approximately 0.5 miles north of the Project Site), vegetated buffer area and conservation/open space, and the camp's siting in a canyon, no public vantage points allow for views that include the camp. As the Project includes development of camp facilities similar to camp facilities that currently and have historically existed at the Project Site, the Project would not substantially degrade the visual character of the site as a kids camp. Additionally, as stated previously, given the remoteness of the camp's location, its distance from the closest development (i.e., a business park located approximately 0.5 miles to the north) and intervening topography, the Project would not degrade the visual character of public views that include views of the site or surrounding uses. Therefore, as described above under Impact AES-1, the additional facilities included as part of the Project would not be viewable from a public vantage point.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

[3] Ibid.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As discussed above, the Project would not result in significant impacts with respect to scenic resources. With the exception of the cases associated with the Project Site itself, the related projects are all located more than 1,000 feet from the Project Site. Based on the distance from the Project Site to the related projects, and the nature of the Project, the Project would not combine with any related projects to generate a significant cumulative impact with respect to scenic resources. Therefore, cumulative aesthetics impacts related to scenic resources would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.C AGRICULTURAL RESOURCES

This section provides an evaluation of agriculture resources impacts associated with the Project.

1. Regulatory Setting

a) State

i) Farmland Mapping and Monitoring Program

The California Department of Conservation (CDOC) maps agricultural lands in California through the Farmland Mapping and Monitoring Program (FMMP), also referred to as the California Important Farmland dataset, which tracks the location, extent, and changes over time (conversion) of agricultural lands in the State.[1] California Public Resources Code (PRC) Section 21060.1 uses the FMMP to define agricultural land for the purposes of assessing environmental impacts under CEQA.[2] The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of such lands. The FMMP provides analysis pertaining to agricultural land use changes throughout California. The CDOC relies on the United States Department of Agriculture Natural Resources Conservation Service (NRCS) soil classifications and definitions, slightly modified for California, to categorize farmland. Farmland categories defined in the CDOC's *Guide to the Farmland Mapping and Monitoring Program* are listed below.[3]

Prime Farmland: Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Farmland of Statewide Importance: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store moisture content. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

The FMMP sets forth specific criteria, all of which must be present, for soils to qualify as Prime Farmland or Farmland of Statewide Importance.[4] These criteria specify the qualifying moisture

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1 California Department of Conservation. DOC Maps: Division of Land and Resource Protection. https://maps.conservation.ca.gov/dlrp/, accessed June 6, 2024.

2 California Public Resources Code, Section 21060.1.

3 California Department of Conservation Division of Land Resource Protection, A Guide to the Farmland Mapping and Monitoring Program 2004 Edition, 2004.

4 Criteria not included for consideration for Farmland of Statewide importance that is part of criteria to qualify as Prime Farmland: permeability and rooting depth.

regimes, temperature range, acid-alkali balance (pH), depth to the water table, soil sodium content, frequency of flooding, erodibility, permeability, rock fragment content, and rooting depth. "Nursery Crops" and "Nursery Bedding Plants" are considered agricultural products, per the California Department of Food and Agriculture (CDFA).

Unique Farmland: Farmland of lesser-quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

Unique Farmland is land that does not meet all of the criteria for either Prime Farmland or Farmland of Statewide Importance. The FMMP does not precisely define the required characteristics of "lesser quality soils" except to state that "Characteristically Unique Farmland" must combine favorable factors such as soil quality, growing season, temperature, drainage, etc. As further stated in the CDOC's Guide to the Farmland and Mapping and Monitoring Program, to qualify as Unique Farmland, land must have been used in the production of specific "high economic value crops" at some time in the four years prior to the mapping date. High value crops are listed in the CDFA California Agricultural Statistics Review.

Farmland of Local Importance: Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land: Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

Urban and Built-Up Land: Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, and public administrative uses; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment; water control structures; and other developed purposes.

Other Land: Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

The CDOC uses a minimum mapping unit of 10 acres, with smaller parcels absorbed into the surrounding classifications.

ii) California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, applies to specific parcels within the State of California. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. The Williamson Act program is administered by the CDOC, in conjunction with local governments that administer the individual contract arrangements with landowners. Participation in the Williamson Act program is dependent on County adoption and implementation of the program and is voluntary for landowners.[5]

In 1969, the County adopted, and has subsequently revised, its "Guidelines for Implementation of the Land Conservation Act of 1965/the Williamson Act" (LCA Guidelines). All land with an Agricultural land use designation in the General Plan is considered an Agricultural Preserve under the LCA. The LCA is implemented through three contract types: LCA Contract, the Farmland Security Zone Area Contract (FSZA/LCA), and the Open Space Contract (OS/LCA). These contracts intend to preserve agricultural land and discourage its premature conversion to non-agricultural uses. Among other things, the LCA Guidelines establish eligibility criteria for these contracts. In exchange for the preservation of agricultural land, participating property owners receive a reduction of property taxes that are limited to the agricultural value of the property.

iii) Farmland Security Zone

The Farmland Security Zone was created by the California State Legislature in 1999 to ensure that long-term farmland preservation is part of public policy in the State. Land must be under a Williamson Act contract and designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance to be eligible. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return for a 35 percent reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner of the property promises not to develop the property into nonagricultural uses.

iv) Open Space Subvention Act

The Open Space Subvention Act was enacted on January 1, 1972, to provide for the partial replacement of local property tax revenue foregone as a result of participation in the Williamson Act program and other enforceable open space restriction programs. Participating local governments receive annual payment on the basis of the quantity (number of acres), quality (soil type and agricultural productivity), and, for Farmland Security Zone contracts, location (proximity to a city) of land enrolled under eligible, enforceable open space restrictions.[6] With

[5] California Department of Conservation. Williamson Act Program Overview. https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx, accessed June 6, 2024.

[6] California Department of Conservation. Open Space Subdivision Act, 1972.

implementation of AB 1265, discussed above, counties that receive less than half of their foregone general fund property tax revenue from the Open Space Subvention Act Program the prior year are eligible to implement a new provision of the Williamson Act to allow both Williamson Act and Farmland Security Zone contracts to be amended from 10 to 20 years to 9 and 18 years, respectively.

v) California Farmland Conservancy Program Act

The California Farmland Conservancy Program Act, also known as SB 1142, established the California Farmland Conservancy Program (CFCP), which provides grants for agricultural conservation easements. An agricultural conservation easement aims to maintain agricultural land in active production by preventing development on the subject parcel and prohibiting practices that would damage or interfere with the agricultural use of the land. Because the easement is a restriction on the deed of the property, the easement remains in effect even when the land changes ownership. While other benefits may accrue because the land is not developed (scenic and habitat values, for example), the primary use of the land is agricultural. Easements funded by the CFCP must be of a size and nature suitable for viable commercial agriculture.[7]

b) Regional

i) Guidelines for Orderly Development

Ventura County's "Guidelines for Orderly Development" (Guidelines) were originally adopted by the Board of Supervisors, all city councils within Ventura County, and the Ventura Local Agency Formation Commission (LAFCo) in 1969. The County revised and readopted the Guidelines in December 1996. The intent of the Guidelines is threefold: (1) clarify the relationship between the cities and the County with respect to urban planning; (2) facilitate a better understanding regarding development standards and fees; and (3) identify the appropriate governmental agency responsible for making determinations on land use change requests. These Guidelines represent a unique, collaborative commitment to encourage urban development within cities whenever and wherever practical; enhance the regional responsibility of County government; and facilitate orderly planning and development in Ventura County.

ii) Greenbelt Agreements

Beginning in 1967, several cities and the County began adopting greenbelt agreements. These are voluntary agreements between the County and one or more cities to limit development of agricultural and/or open space areas within the unincorporated county. Through greenbelt agreements, cities commit to not annex any property within a greenbelt while the County agrees

[7] California Department of Conservation. California Farmland Conservancy Program. https://www.conservation.ca.gov/dlrp/grant-programs/cfcp,accessed June 6, 2024.

to restrict development to uses consistent with existing agricultural or open space zoning. There are seven greenbelts in Ventura County covering approximately 164,000 acres collectively.

iii) Save Open Space & Agricultural Resources (SOAR)

Ventura County voters first approved the countywide SOAR initiative measure in 1998. The County SOAR initiative requires countywide voter approval (i.e., approval by voters in both the unincorporated county and incorporated cities) of most changes to the General Plan involving the Agricultural, Open Space, or Rural land use designations, and most changes to a General Plan goal or policy related to those land use designations. In November 2016 by countywide vote, SOAR was renewed and extended through 2050. Goals, policies, and implementation programs from the 1988 General Plan that were referenced in the 2016 SOAR initiative are included in the 2040 General Plan, with only minor non-substantive revisions.

A. Agricultural/Urban Buffer Policy

The County's Agricultural/Urban Buffer Policy provides policy direction to prevent and/or mitigate conflicts that may arise at the agricultural/urban interface. This policy is intended to protect the economic viability and long-term sustainability of the county's agricultural industry. It applies where urban structures or ongoing non-farming activities are permitted adjacent to land in crop or orchard production or classified by the California Department of Conservation Important Farmland Inventory as Prime, Statewide Importance, Unique or Local Importance farmland. These guidelines apply to projects requiring discretionary approval by the County or a city where the proposed non-farming activity is abutting or on land zoned "Agricultural Exclusive," "Open Space," or "Rural Agricultural," and the farming activity is located outside a Sphere of Influence.

iv) Right-to-Farm Ordinance

The County adopted the Right-to-Farm Ordinance in the late 1970s. It is administered by both the Planning Division through the Zoning Ordinance and by the County Agricultural Commissioner. The Right-to-Farm Ordinance is intended to support and provide a safeguard for existing agricultural and farming operations that could be threatened by encroaching residential development. This is achieved through mandatory disclosure notifications provided to property owners who will be developing residential uses adjacent or near existing agricultural operations. The disclosure informs people seeking to develop or purchase homes of the Right-to-Farm Ordinance and the potential impacts that may be generated by nearby farming operations. The Ordinance also protects farms from nuisance complaints associated with customary farming practices.

v) Ventura County General Plan

The Agriculture Element of the County's General Plan contains the following policies regarding the preservation of agricultural land:

AG-1.1 Agricultural Land Protection and Preservation

The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.

AG-1.2 Agricultural Land Use Designation

The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.

AG-1.3 Greenbelt Agreements

The County shall preserve agricultural land by retaining and expanding existing Greenbelt Agreements and encouraging the formation of additional Greenbelt Agreements.

AG-1.4 Land Conservation Act Contracts

The County shall encourage Land Conservation Act (LCA) contracts on irrigated farmlands and Open Space lands.

AG-1.5 Facilities and Programs to Support Local Agriculture

The County shall encourage the continuation and development of facilities and programs that support agricultural production and enhance the marketing of county grown agricultural products.

AG-1.6 Support Economic Viability of Agriculture

The County shall improve the economic viability of agriculture through policies that support agriculture as an integral business to the County.

AG-1.7 Encourage Purchase of Local Agricultural Products

The County shall encourage opportunities for Ventura County residents to buy local agricultural products.

AG-1.8 Avoid Development on Agricultural Land

The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible.

The Agriculture Element of the County's General Plan also contains the following policies to enhance the long-term viability of agriculture in the County:

AG-2.1 Discretionary Development Adjacent to Agriculturally Designated Lands

The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands. (RDR)

AG-2.2 Impacts from Transportation Capital Improvements

The County shall plan transportation and other County capital improvements so as to avoid or mitigate impacts to important farmland to the extent feasible. (SO)

AG-2.3 Right-to-Farm Ordinance

The County's Right-to-Farm Ordinance shall be maintained and updated as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas. (RDR)

AG-2.4 Hillside Erosion Control Ordinance

The County shall regulate hillside agricultural grading through the Hillside Erosion Control Ordinance and its oversight by the Public Works Agency. (RDR)

The Land Use Element of the County's General Plan includes the following policy related to agricultural buffers:

LU-6.1 Agricultural Buffers

The County shall require non-agricultural land uses adjacent to agricultural uses to incorporate adequate buffers (e.g., fences, setbacks) to limit conflicts with adjoining agricultural operations.

2. Environmental Setting

a) Regional

According to the Agriculture Element of the County's General Plan, Ventura County's temperate climate with warm, wet winters and hot, dry summers coupled with fertile soils, supports the

cultivation of a diversity of agricultural commodities, including strawberries, celery, lemons, raspberries, avocados, nursery stock, tomatoes, peppers, cut flowers, cabbage, and kale. According to the State of California, Ventura County ranked tenth among California counties in total crop value in 2024 based on data from the County Agricultural Commissioner's Annual Crop and Livestock Report.

The areas that sustain agricultural commodity growth have a broad range of characteristics. For example, berry production requires a temperate moist climate, so most strawberry production is found close to the coast, surrounding the cities of Ventura, Oxnard, Camarillo, and Port Hueneme. The climate tends to be dryer and warmer further from the coast, favoring citrus crops. Specifically, the Highway 126 and 150 corridors are prime areas for citrus growth. The fertile soil combined with ideal temperate seasonal temperatures allow lemons, oranges, and mandarins to thrive. Some commodity types, such as avocados, can grow in a variety of climate regions, allowing them to flourish countywide.

The 2024 Crop and Livestock Report indicates that much of the county's agricultural production occurred on 95,850 acres of irrigated cropland out of a total farmed acreage of approximately 294,000 acres. Of the total farmed acreage, approximately 198,000 acres are considered rangeland.

b) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion (Project Site) of the 2,558-acre Subject Parcels. The boundaries of the Subject Parcels and the Project Site are shown in Figure I-1, in Section I, Introduction/Summary, of this Draft EIR. Figure I-1 also shows the Project Construction Footprint, which is all areas where grading, construction, and fuel modification would occur. While the Subject Parcels are mostly zoned Open Space (OS-160 ac.) and designated in the Open Space land use category, the 328-acre portion where camp facilities are located is zoned Rural Agricultural (RA-160 ac.) and carries a Rural land use category. As shown in Figure IV.C-1, the Project Site does not include any land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. While a portion of the Project Site is classified as Farmland of Local Importance, the proposed development would occur within land classified as Urban and Built-Up Land.

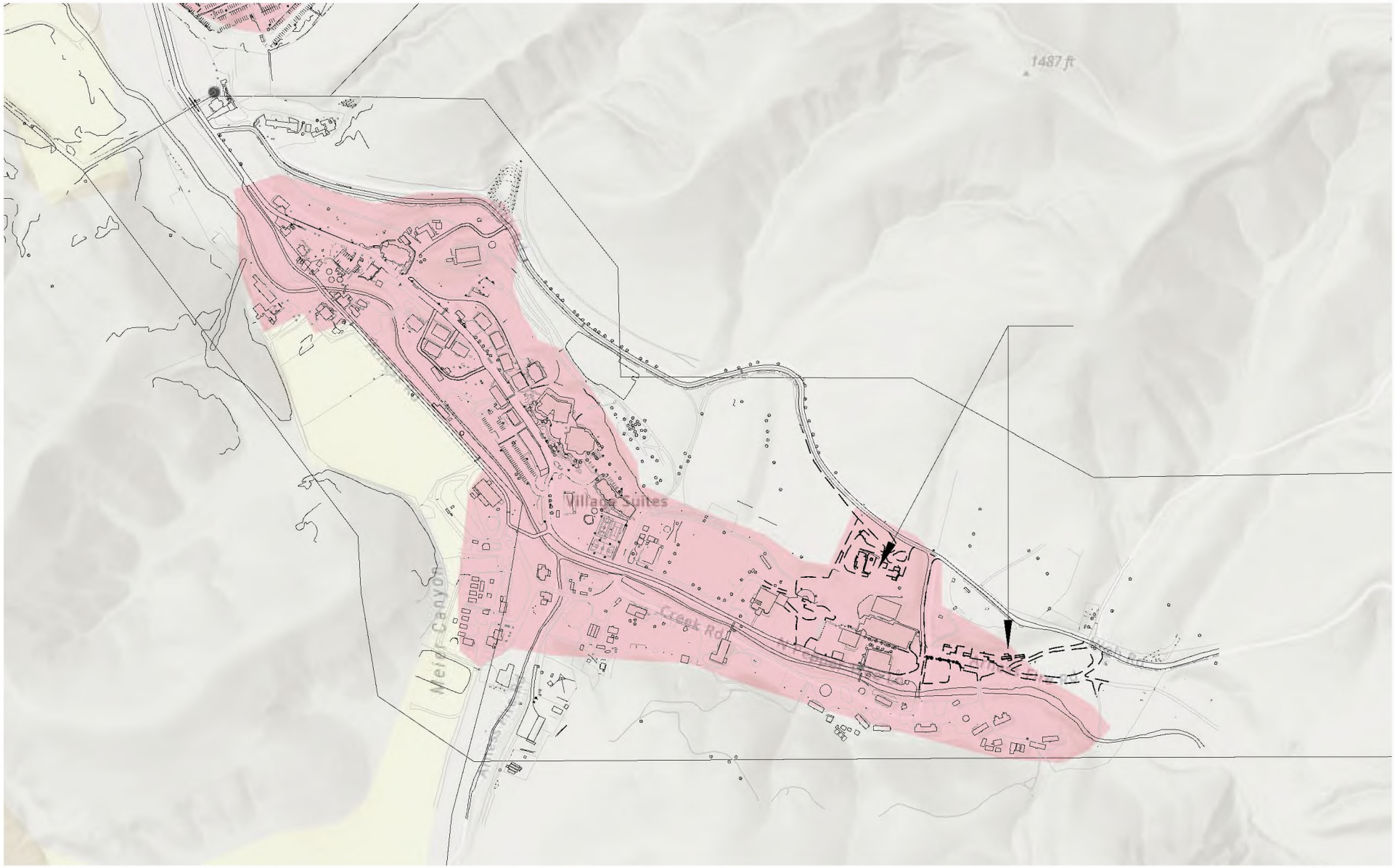


Figure IV.C-1
Project Area Farmland Map

Source: California Department of Conservation, 2025.

In terms of crop production, there is an avocado crop on the Project Site.[8] However, it is more than 600 feet from any building on the Project Site, and no Project construction activities would occur within the vicinity of the avocado crop. There are also two crops identified off-site – a nursery and a Christmas tree crop, both near Tapo Canyon Road and East Los Angeles Avenue.[9] Based on the distance from the Project Site, neither of these crops would be impacted by the Project. In addition, the closest Williamson Act contract land is approximately 4.5 miles north of the Project Site.[10] Therefore, based on the distance from this land to the Project Site, the Project would not impact any land subject to a Williamson Act contract.

3. Impact Analysis

a) Thresholds of Significance

The analysis of agriculture resources impacts considers criteria identified in the CEQA Guidelines Appendix G Environmental Checklist for Agriculture and Forestry Resources and uses the following significance thresholds from the County's Initial Study Assessment Guidelines (ISAGs).

i) ISAGs: Agricultural Resources – Soils

Any project that would result in direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance will have an impact. Any project that would result in the direct and/or indirect loss of agricultural soils meeting or exceeding the following criteria will be considered as having a significant project impact:

General Plan Land Use Designation	Important Farmland Inventory Classification	Acres Lost
Agricultural:	Prime Statewide:	5 acres
	Unique:	10 acres
	Local:	15 acres
Open Space/Rural:	Prime Statewide:	10 acres
	Unique:	15 acres
	Local:	20 acres
All Others:	Prime Statewide:	20 acres
	Unique:	30 acres
	Local:	40 acres

ii) ISAGs: Agricultural Resources – Land Use Incompatibility

Any land use or project that is not defined as Agriculture or Agricultural Operations in the zoning ordinances will be evaluated for effects on adjacent *classified farmland*. Analysis is based on the distance between new non-agricultural structures or uses and any common lot boundary line

[8] https://maps.ventura.org/arcgis/rest/services/SDs/PlanningGIS_Resources/MapServer/6.
[9] Ibid.
[10] https://maps.ventura.org/arcgis/rest/services/SDs/PlanningGIS_Resources/MapServer/15.

adjacent to off-site classified farmland. Minimum buffer distances are 300 feet if vegetative screening is not present and 150 feet if vegetative screening is present.

iii) Appendix G of the CEQA Guidelines

A project could have a significant impact if the project would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
d) Result in the loss of forest land or conversion of forest land to non-forest use?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

b) Project-Specific Impacts

Impact AG-1: The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, nor would the Project result in the direct loss of soils classified as Farmland of Local Importance. No impacts related to this issue would occur as a result of the Project, and no mitigation measures are required.

The Project Site does not include any land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. While a portion of the Project Site is classified as Farmland of Local Importance, as shown in Figure IV.C-1, the proposed development would occur within land classified as Urban and Built-Up Land, and the Project would not result in the loss of any soils classified as Farmland of Local Importance. The boundaries of Project construction activities are approximately 1,500 feet from the closest soils classified as Farmland of Local Importance (see Figure IV.C-1). Based on this distance, the Project would not impact any farmland and no impacts related to this issue would occur.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AG-2: The Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts related to this issue would occur as a result of the Project, and no mitigation measures are required.

According to the California Department of Conservation, the Project Site is not subject to a Williamson Act contract.[11] In addition, while the 328-acre portion of the Project Site where camp facilities are located is zoned Rural Agricultural (RA-160 ac.), the proposed improvements would be consistent with this existing zoning designation. The closest Williamson Act contract land is approximately 4.5 miles north of the Project Site.[12] Therefore, based on the distance from this land to the Project Site, the Project would not impact any land subject to a Williamson Act contract. Thus, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AG-3: The Project would not result in other changes that could result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. No impacts related to this issue would occur as a result of the Project, and no mitigation measures are required.

As discussed above under Impacts AG-1 and AG-2, the proposed development would occur on the portion of the Project Site classified as Urban and Built-Up Land. In addition, as discussed above under Impacts AG-3 and AG-4, the Project Site is not zoned for forest land, and there are no forestry resources on the Project Site. Further, all camp activities would occur on the Project Site and within existing recreational areas (such as existing trails) and would not occur off-site. Thus, the Project would not result in the conversion of Farmland to non-agricultural use. Therefore, no impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

[11] California Department of Conservation, California Williamson Act Enrollment Finder, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html, accessed June 7, 2024.

[12] https://maps.ventura.org/arcgis/rest/services/SDs/PlanningGIS_Resources/MapServer/15.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As discussed above, the Project Site does not include any forest land or land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. While a portion of the undeveloped portion of the Project Site is classified as Farmland of Local Importance, the Project would not be located on Farmland of Local Importance. While it's possible that some of the related projects could be located on land designated for agricultural resources, the Project would not contribute to any potential cumulative impacts related to agricultural resources. Therefore, cumulative impacts related to agricultural resources would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.D AIR QUALITY

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, affecting a substantial number of people. The information and analysis presented below are primarily based on the following source, which is included as Appendix B of this Draft EIR:

B Air Quality Technical Modeling, DKA Planning, August 2025.

1. Regulatory Framework

a) Federal

i) Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: CO (carbon monoxide), NO_2 (nitrogen dioxide), O_3 (ozone), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), SO_2 (sulfur dioxide), and Pb (lead).

The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining

NAAQS. The federal and state standards are summarized in Table IV.D-1. The USEPA has classified Ventura County as a nonattainment area for O_3, and attainment for PM_{10} and $PM_{2.5}$.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

Table IV.D-1
State and National Ambient Air Quality Standards and Attainment Status for Ventura County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Attainment
	Annual Arithmetic Mean	12 µg/m^3	Attainment	9 µg/m^3	Attainment[1]
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

N/A = not available ppm = parts per million µg/m^3 – micrograms per cubic meter
mg/m^3 – milligrams per cubic meter

Source: USEPA, NAAQS Table (https://www.epa.gov/criteria-air-pollutants/naaqs-table) and CARB, California Ambient Air Quality Standards (https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards). Attainment status data from CARB, Ambient Air Quality Standards, and attainment status (www.arb.ca.gov/desig/adm/adm.htm).

[1] The US EPA promgulated an updated annual $PM_{2.5}$ standard on February 7, 2024. Subsequently, CARB submitted its recommendations on Feburary 7, 2025, calling for Ventura County to be designated as an attainment area. US EPA has until February 6, 2026 to finalize the area designation for Ventura County.

b) State

i) California Clean Air Act

In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California, CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table IV.D-1, above.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment.

In August 2022, CARB approved regulations to ban new gasoline-powered cars beginning with 2035 models. Automakers will gradually electrify their fleet of new vehicles, beginning with 35 percent of 2026 models sold. Trucking companies were also allowed to gradually convert their existing fleets to zero emission vehicles. However, the second Trump Administration revoked California's ability to set its own vehicle emission standards on June 12, 2025. This halted efforts to implement California's Clean Cars II regulation, Advanced Clean Trucks regulation, and its Omnibus Low NO_x regulations. While these were challenged by 11 states, these programs are on hold pending further resolution.

ii) Toxic Air Contaminant Identification and Control Act

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to

reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. CARB approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions.

iii) California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[2] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[3] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has

[2] California Air Resources Board, California Air Toxics Program, https://ww2.arb.ca.gov/our-work/programs/air-toxics-program, last reviewed by CARB September 24, 2015.

[3] California Air Resources Board, Toxic Air Contaminant Identification List, https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

iv) Air Quality and Land Use Handbook: A Community Health Perspective

The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.[4] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis.

Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

v) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled,

[4] California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

c) Regional

i) Southern California Association of Governments (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with air quality and transportation stakeholders in Southern California to ensure compliance with federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the VCAPCD, of the transportation strategy and transportation control measure sections of the Air Quality Management Plan (AQMP) for the Air Basin.

SCAG adopted the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) on September 23, 2020. The RTP/SCS addresses the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for $639 billion in transportation investments and reducing vehicle miles traveled (VMT) by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six percent more household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024. The RTP/SCS addresses the transportation and air quality impacts of two million additional residents, 1.6 additional households, and 1.3 million additional jobs by 2050. The Plan calls for $751.7 billion in transportation investments and reducing vehicle miles traveled (VMT) and is the latest long-range plan, continuing to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledging how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2024-2050 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2024-2050 RTP/SCS land use pattern continues the trend of focusing 66 percent of new households and 54 percent of new jobs in Priority Development Areas and the region's High Quality Transit Corridors (HQTCs) and aims to enhance and build out the region's transit network. HQTCs are a cornerstone of land use planning best practice in the SCAG region, and studies have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

ii) Ventura County Air Pollution Control District

The mission of the Ventura County Air Pollution Control District (APCD or District) is to protect public health and agriculture from the adverse effects of air pollution by identifying air pollution problems and developing a comprehensive program to achieve and maintain state and federal air quality standards. To that end, pursuant to the federal Clean Air Act Amendments (CAAA) of 1990, the 2022 Ventura County Air Quality Management Plan (AQMP) presents Ventura County's: 1) strategy to attain the 2015 federal 8-hour ozone standard; 2) attainment demonstration for the federal 8-hour ozone standard; and 3) reasonable further progress demonstration for the federal 8-hour ozone standard.

Programs that were developed by VCAPCD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. VCAPCD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the VCAPCD jurisdiction are subject to VCAPCD rules and regulations, including, but not limited to the followingl:

- VCAPCD Rule 51 (Nuisance), which prohibits air quality emissions that would cause injury, detriment, nuisance, or annoyance to a considerable number of persons.

- VCAPCD Rule 55 (Fugitive Dust) regulates emissions of particulate matter from any operation, disturbed surface area, or man-made condition. This includes bulk material handling, earth-moving, construction, demolition, storage piles, unpaved, roads, and track-out.

- VCAPCD Rule 55.1 (Paved Roads and Public Unpaved Roads) regulates emissions from construction of earthmoving equipment that causes fugitive dust emissions on a public unpaved road.

- VCAPCD Rule 62.7 (Asbestos-Demolition and Renovation) regulates activities that involve disturbance of asbestos-containing materials during demolition and renovation operations.

- In accordance with Section 2485 in Title 13 of the CCR, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

A. Air Quality Management Plan

VCAPCD adopted the 2022 AQMP on December 13, 2022, updating the region's air quality attainment plan to Ventura County's strategy (including related mandated elements) to attain the 2015 federal 8-hour ozone standard, as required by the federal Clean Air Act Amendments of 1990. Photochemical air quality modeling indicated that Ventura County will attain the 2015 federal 8-hour ozone standard by 2026 using local, state, and federal clean air programs. The 2022 AQMP presents a strategy for attaining the 2015 federal 8-hour ambient air quality standard for ozone, the only federal clean air standard Ventura County does not meet, by the statutory compliance deadline of August 3, 2027.[5] It was prepared to satisfy federal Clean Air Act planning requirements for areas designated as serious federal 8-hour ozone nonattainment areas, including, but not limited to, updated air quality information, an updated emissions inventory, local and state air pollutant control measures, new emission forecasts and projections, a new federal conformity budget for transportation projects, a reasonable further progress demonstration for precursors of ozone (reactive organic compounds and nitrogen oxides), a new countywide emission carrying capacity, and a demonstration that Ventura County will attain the federal 8-hour ozone standard. The 2022 AQMP relies on the growth assumptions in the Southern California

[5] The US EPA promgulated an updated annual $PM_{2.5}$ standard on February 7, 2024. Subsequently, CARB submitted its recommendations on Feburary 7, 2025, calling for Ventura County to be designated as an attainment area. US EPA has until February 6, 2026 to finalize the area designation for Ventura County.

Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

B. Air Quality Assessment for CEQA

VCAPCD has provided guidance on frequently asked questions that include links to internal and external guidance on how to prepare air quality assessments under CEQA. This includes a link to its Ventura County Air Quality Assessment Guidelines.

iii) Ventura County General Plan

The County of Ventura 2040 General Plan includes several goals and policies related to air quality, including the following from its Hazards and Safety Element:

- **HAZ-10.1 (Air Pollutant Reduction)**. The County shall strive to reduce air pollutants from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.

- **HAZ-10.2 (Air Quality Management Plan Consistency)**. The County shall prohibit discretionary development that is inconsistent with the most recent adopted Air Quality Management Plan (AQMP), unless the Board of Supervisors adopts a statement of overriding considerations.

- **HAZ-10.3 (Air Pollution Control District Rule and Permit Compliance)**. The County shall ensure that discretionary development subject to Ventura County Air Pollution Control District (VCAPCD) permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.

- **HAZ-10.5 (Air Pollutant Impact Mitigation Measures for Discretionary Development)**. The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas (GHG) emissions.

- **HAZ-10.8 (Alternative Transportation Modes)**. The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.

- **HAZ-10.9 (Mitigation of Objectionable Odors)**. The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state

law, shall be required to operate in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District (VCAPCD), with emphasis on Rule 51, Nuisance throughout the life of the permit.

- **HAZ-10.11 (Air Quality Assessment Guidelines)**. In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guides to implement this policy.

- **HAZ-10.12 (Conditions for Air Quality Impacts)**. The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all feasible mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impacts shall be encourage in project design.

- **HAZ-10.13 (Construction Air Pollutant Best Management Practices)**. Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.

- **HAZ-10.14 (Fugitive Dust Best Management Practices)**. The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs to reduce emissions to be less than applicable thresholds.HAZ-10.1 (Air Pollutant Reduction).

The VCAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects.

2. Existing Conditions

a) Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as “criteria air pollutants,” are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include CO, O_3, NO_x, SO_x, PM_{10},

$PM_{2.5}$, and lead (Pb). The descriptions of each criteria air pollutant and their health effects provided below are based on information provided by the VCAPCD.[6]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when reactive organic compounds (ROCs) and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2). Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper

[6] Ventura County Air Pollution Control District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.

respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

ii) State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_X, as well as PM.

Sulfates (SO_4^{2-}). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold

on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

iii) Toxic Air Contaminants (TACs)

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[7]

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (diameter less than 2.5 micrometer [µm]), including a subgroup of ultrafine particles (diameter less than 0.1 µm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[8,9]

b) Project Site

The Project Site is located within the South Central Coast Air Basin (Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The Basin includes San Luis Obispo, Santa Barbara, and Ventura counties. The air quality within the Basin is primarily influenced by a wide

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7 California Air Resources Board, Toxic Air Contaminant Identification List, https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

8 California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.

9 California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

i) Air Pollution Climatology

The air above Ventura County often exhibits weak vertical and horizontal dispersion characteristics, which limit the dispersion of emissions and cause increased ambient air pollutant levels. Persistent temperature inversions prevent vertical dispersion. The inversions act as a "ceiling" that prevents pollutants from rising and dispersing. Mountain ranges act as "walls" that inhibit horizontal dispersion of air pollutants. The diurnal land/sea breeze pattern common in Ventura County recirculates air contaminants. Air pollutants are pushed toward the ocean during the early morning by the land breeze, and toward the east during the afternoon, by the sea breeze. This creates a "sloshing" effect, causing pollutants to remain in the area for several days. Residual emissions from previous days accumulate and chemically react with new emissions in the presence of sunlight, thereby increasing ambient air pollutant levels.

This pollutant "sloshing" effect happens most predominantly from May through October ("smog" season). Air temperatures are usually higher and sunlight more intense during the "smog" season. This explains why Ventura County experiences the most exceedances of the state and federal ozone standards during this six-month period.

ii) Air Monitoring Data

The VCAPCD monitors air quality conditions at five source receptor areas (SRA) throughout the Basin. The Project Site is located about 1.9 miles southwest of the nearest monitoring station (Simi Valley-Cochran Street) located at 5400 Cochran Street in Simi Valley. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table IV.D-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2021 through 2023. The one-hour State standard for O_3 was not exceeded during this three-year period. The federal standard was exceeded 30 times in that same period. In addition, the daily State standard for PM_{10} was exceeded seven times, while the daily federal standard for $PM_{2.5}$ was not exceeded.

Table IV.D-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2021	2022	2023
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.090	0.094	0.094
Days > 0.09 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	0.081	0.083	0.081
Days > 0.09 ppm (State 8-hour standard)	8	11	12
Days > 0.070 ppm (Federal 8-hour standard)	8	10	12
PM_{10}			
Maximum 24-hour Concentration (µg/m^3)	101.5	44.1	80.6
Days > 50 µg/m^3 (State 24-hour standard)	3	0	4
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	32.9	22.7	19.9
Days > 35 µg/m^3 (Federal 24-hour standard)	0	0	0

ppm = parts by volume per million of air *µg/m^3 = micrograms per cubic meter*
N/A = not available at this monitoring station (Simi Valley-Cochran Street)

Source: California Air resources Board annual monitoring data (https://www.arb.ca.gov/adam/select8/sc8start.php) accessed August 2025.

iii) Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified several groups that are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the VCAPCD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located in rural unincorporated Simi Valley in a remote valley southeast of Simi Valley. As such, there are no sensitive receptors within a mile of the boundaries of the Project Site.

iv) Existing Project Site Emissions

The 2,558-acre campus is home to the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Project Site. There are 117 structures associated with the camp totaling 208,000 square feet.

During summer camps, the presence of 400 campers, as well as support staff, can generate about 651 daily vehicle trips.[10] As shown in Table IV.D-3, these activities can generate about 5.7 pounds per day of ozone-forming precursor emissions (i.e., ROC and NO_x) and 5.8 pounds per day of particulate matter.

In addition, seven structures totaling 11,322 square feet occupy the portion of the campus that would be redeveloped. This includes three trailers used for staff housing, two cottages used for staff housing, and a detached garage. As summarized in Table IV.D-3, the emissions from the six structures to be demolished when combined with emissions from the existing summer camp activities produce incremental emissions of all criteria pollutants.

Table IV.D-3
Existing Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	0.3	<0.1	0.4	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	3.1	2.6	22.9	0.1	4.6	1.2
Total	**3.4**	**2.7**	**23.3**	**0.1**	**4.6**	**1.2**

Source: DKA Planning, 2024, based on CalEEMod 2022.1.1.26 model runs (included in Appendix B). Numbers may not add due to rounding.

3. Impact Analysis

a) Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the VCAPCD's *Ventura County Air Quality Assessment Guidelines* (AQAG). The VCAPCD recommends the use of the California Emissions Estimator Model (CalEEMod) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focus on the potential emissions from construction and operation of the Project. Methodologies used to evaluate these emissions are discussed below.

i) Construction

Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Where available, project-specific information was provided on the schedule of construction activities and the anticipated equipment inventory. Otherwise, model default values were used for equipment usage rates, worker trip lengths, emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition

[10] Stantec, American Jewish University Camp Expansion – Traffic Impact Study; July 6, 2023.

to vehicle trips to and from the Project Site. Details pertaining to the schedule and equipment can be found in Appendix B.

ii) Operation

CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions are produced by mobile sources (vehicular travel) and stationary sources (e.g., utilities demand). Utilities for the Project Site are provided by Southern California Edison (SCE) for electricity and Southern California Gas for natural gas. CalEEMod has derived default emissions factors for electricity and natural gas use that are applied to the size and land use type of the Project. CalEEMod also estimates operational emissions associated with water use, wastewater generation, and solid waste disposal.

Similar to construction, the CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions.[11] To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against VCAPCD's significance thresholds. Details describing the operational emissions of the Project can be found in in Appendix B.

b) Thresholds of Significance

A project could have a significant impact if the project would:

(a) Conflict with or obstruct implementation of the applicable air quality plan;

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard;

(c) Expose sensitive receptors to substantial pollutant concentrations; or

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

i) Consistency with Applicable Air Quality Plans

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. This analysis is conducted to assess potential project impacts

[11] Energy consumption estimates with CalEEMod 2022.1.1.29 are based on the California Energy Commission's 2020 Residential Appliance Saturation Survey (residential uses) and 2021 Commercial Forecast database, both of which reflected the 2019 Title 24 energy efficiency standards. These energy consumption estimates were adjusted to reflect the 2022 Title 24 standards that cumulatively produce a 0.49 percent reduction in electricity use and 0.45 percent reduction in natural gas use when compared to the 2019 standards.

against Threshold (a) from the Appendix G thresholds. In accordance with the VCAPCD's *Ventura County Air Quality Assessment Guidelines*, the following criteria are used to evaluate a project's consistency with the AQMP:

- Will the Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations;
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or
    - To what extent is Project development consistent with the AQMP land use policies?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the VCAPCD's AQMP and SCAG regional plans and policies. In addition, the Project's consistency with the County of Ventura General Plan is discussed.

ii) Construction Emissions

The County recommends that determination of significance be made on a case-by-case basis, considering the following criteria to evaluate construction-related air emissions:

Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

Fugitive Dust—Grading, Excavation and Hauling

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route

Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil

Other Mobile Source Emissions

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

In addition, as set forth in the VCAPCD's *Ventura County Air Quality Assessment Guidelines/AQAG*, there is no threshold of significance. However, VCAPCD's *Guidelines* do state that construction-related emissions should be quantified and emission reduction measures imposed if estimates of ROC or NO_x emissions from heavy-duty construction equipment exceed 25 pounds per day for NO_x or 25 pounds a day for ROC.

iii) Operation

As discussed above, the County uses Appendix G as the thresholds of significance for this analysis. Accordingly, the following criterion serves as quantitative air quality standards to be used to evaluate project impacts under the Appendix G thresholds. Under these thresholds, a significant threshold would occur when operational emissions from both direct and indirect sources would exceed 25 pounds per day for NO_x or 25 pounds a day for ROC.

c) Project-Specific Impacts

Impact AQ-1: The Project would be consistent with the 2022 AQMP, and therefore, Project impacts related to AQMP consistency would be less than significant.

As discussed in more detail below, Project emissions would not exceed any State or federal standards. Thus, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the County of Ventura General Plan and SCAG's RTP. The General Plan serves as a comprehensive, long-term plan for future development of the County.

The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates a total of 101,300 persons; 33,600 households; and 36,900 jobs in the unincorporated County of Ventura by 2045. The County provided local growth forecasts that were incorporated into the regional projections, which included the existing campus and summer camp facilities.

The Project would involve improvements to an existing summer camp facility that would increase the number of summer campers by 100 and increase the frequency of events for special events at the campus. As such, the Project would not increase the population in the County or air basin. Any increment of additional employment to accommodate these activities would be de minimis.

As a result, the Project would be consistent with the growth assumptions in the County's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP. Thus, the Project's estimated employment impact would be consistent with the local job growth assumptions that formed the basis of the region's AQMP. As a result, the Project would be consistent with the growth projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by VCAPCD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the proposed Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the VCAPCD, as required by the General Plan Hazards and Safety Element Policy HAZ-10.3 (Air Pollution Control District Rule and Permit Compliance). Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. As noted earlier, the Project is consistent with the land use policies of the County that were reflected in the regional growth projections for the AQMP. As demonstrated in the following analysis, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

The Project would incrementally increase criteria pollutant emissions during summer camps and during any intermittent special events at the campus. As illustrated in Table IV.D-4, the Project would be consistent with the County's General Plan Hazards and Safety Element policies.

Table IV.D-4
Project Consistency with County of Ventura General Plan Hazards and Safety Element

Goal/Objective/Policy	Project Consistency
HAZ-10.1 (Air Pollutant Reduction).	**Consistent.** The Project amends the operational plan of an existing special events center that will not increase population, full-time housing, and will result in a nominal increase in on-site jobs during the summer and special events. As such, the Project would not contribute to growth that would place additional demands on air pollution regulators.
HAZ-10.2 (Air Quality Management Plan Consistency).	**Consistent.** The Project would be consistent with the County's General Plan designation of the site as an educational facility with special event operations. As such, the Project would be consistent with the 2022 AQMP for the County.
HAZ-10.3 (Air Pollution Control District Rule and Permit Compliance).	**Consistent.** The Project would comply with VCAPCD rules and regulations governing construction-related air quality impacts (e.g., reducing fugitive dust emissions) and operations.
HAZ-10.5 (Air Pollutant Impact Mitigation Measures for Discretionary Development).	**Consistent.** The Project will comply with Title 24 standards for advanced technologies that will reduce energy consumption and resulting criteria pollutant and greenhouse gas emissions.
HAZ-10.8 (Alternative Transportation Modes).	**Consistent.** The Project would accommodate additional facilities for counselors and staff to reside on the campus during summer and special events, thereby reducing commutes to and from the Brandeis campus location.
HAZ-10.9 (Mitigation of Objectionable Odors).	**Consistent.** The Project would be subject to VCAPCD Rule 51 (Nuisance) that would help regulate any odors from the facility. Given the

Table IV.D-4
Project Consistency with County of Ventura General Plan Hazards and Safety Element

Goal/Objective/Policy	Project Consistency
	Project Site's distance of more than one mile to off-site sensitive receptors, the potential for nuisance from on-site odors is negligible.
HAZ-10.11 (Air Quality Assessment Guidelines).	**Consistent.** The Project's evaluation for air quality impacts under CEQA is consistent with the VCAPCD's guidelines for air quality assessments and includes stationary and mobile sources of emissions.
HAZ-10.12 (Conditions for Air Quality Impacts).	**Consistent.** The Project's evaluation for air quality impacts under CEQA is consistent with the VCAPCD's guidelines for air quality assessments and includes stationary and mobile sources of emissions. No significant impacts are expected from the Project; as such, mitigation measures are not required.
HAZ-10.13 (Construction Air Pollutant Best Management Practices).	**Consistent.** The Project would comply with VCAPCD rules and regulations governing construction-related air quality impacts and best practice management strategies (e.g., reducing fugitive dust emissions) and operations.
HAZ-10.14 (Fugitive Dust Best Management Practices).	**Consistent.** The Project would minimize particulate emissions during construction through best practices and VCAPCD rules. Given the Project Site's distance of more than one mile to off-site sensitive receptors, the potential for nuisance from on- or off-site fugitive dust emissions is negligible.
Source: DKA Planning, 2025.	

For all the reasons discussed above, the Project would be consistent with the 2022 AQMP, and therefore, Project impacts related to AQMP consistency would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AQ-2: **The Project would not generate pollutant emissions in excess of County significance thresholds. Thus, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. Therefore, impacts related to this issue would be less than significant.**

Construction Emissions

Construction-related emissions were estimated using the CalEEMod 2022.1.1.29 model and an estimated construction schedule of 22 months summarized on Table IV.D-5.

Table IV.D-5
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of seven structures totaling 11,322 square feet of building floor area hauled twenty miles to landfill in 14-cubic yard capacity trucks.
Site Preparation	Month 2	Grubbing and removal of trees, plants, landscaping, weeds
Grading	Months 3-4	Fine grading of the site, with 67,600 cubic yards of total cut and 67,600 cubic yards of total fill.
Trenching	Months 5-10	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 11-22	Foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 11	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 20-22	Application of interior and exterior coatings and sealants.

Source: DKA Planning, 2024.

As shown in Table IV.D-6, the Project 's construction activities would not generate pollutant emissions in excess of County significance thresholds, assuming the use of equipment certified at US EPA Tier 4 standards. Therefore, the Project's air quality impacts during construction would be less than significant.

Table IV.D-6
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2026	0.7	4.6	36.5	0.1	8.0	4.1
2027	0.6	5.0	27.5	<0.1	0.6	0.2
2028	5.3	3.7	17.0	<0.1	0.5	0.2
Maximum Total	***5.3***	***5.0***	***36.5***	***0.1***	***8.0***	***4.1***
Significance Threshold	*25*	*25*	*N/A*	*N/A*	*N/A*	*N/A*
Exceed Threshold?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of VCAPCD Fugitive Dust rules.

Source: DKA Planning, 2025, based on CalEEMod 2022.1.1.29 model runs. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in Appendix B.

Operational Emissions

As shown in Table IV.D-7, the Project's operational emissions would not exceed County significance thresholds. Therefore, the Project's operational air quality impacts would be less than significant.

Table 7
Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	0.9	<0.1	0.1	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.2	0.1	<0.1	<0.1	<0.1
Mobile Sources	5.1	3.9	36.1	0.1	8.6	2.2
Regional Total	***6.0***	***4.1***	***38.0***	***0.1***	***8.7***	***2.3***
Less Existing Emissions	*(3.4)*	*(2.7)*	*(23.3)*	*(0.1)*	*(4.6)*	*(1.2)*
Net Regional Total	***2.6***	***1.4***	***14.7***	***<0.1***	***4.1***	***1.1***
Significance Threshold	*25*	*25*	*N/A*	*N/A*	*N/A*	*N/A*
Exceed Threshold?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

Source: DKA Planning, 2025, based on CalEEMod 2022.1.1.29 model runs (included in Appendix B). Totals reflect the summer season maximum and may not add up due to rounding.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AQ-3: No sensitive receptors are located near the Project Site. The Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no impacts related to this issue would occur as a result of the Project.

There are no sensitive receptors within one mile of the Project Site that could be exposed to air pollution from construction and operation of the Project. As such, sensitive receptors would not be exposed to substantial pollutant concentrations. Therefore, no impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact AQ-4: The Project would not result in activities that create objectionable odors. Thus, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, no impacts related to this issue would occur as a result of the Project.

The Project would not result in activities that create objectionable odors. The Project is a recreational facility expansion that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). VCAPCD regulations that govern nuisances would regulate any intermittent odors. Moreover, there are no sensitive receptors within one mile of the Project Site that could be exposed to odors from construction and operation of the Project. As such, sensitive receptors would not be exposed to substantial odors. Therefore, no impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

d) Cumulative Impacts

Cumulative impacts with respect to air quality are addressed above, under Impact AQ-2. As discussed therein, cumulative impacts with respect to air quality would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.E BIOLOGICAL RESOURCES

This section provides an evaluation of biological resources impacts associated with the proposed Project. The evaluation uses information from the following sources, which are included as Appendices C-1 through C-7 (respectively) of this Draft EIR:

C-1 Initial Study Biological Assessment Report, Wildscape Restoration, October 26, 2022.

C-2 Review of ISBA, Rincon Consultants, November 16, 2022.

C-3 Revised Initial Study Biological Assessment Report, Wildscape Restoration, October 26, 2022, revised May 10, 2024.

C-4 Initial Study Biological Assessment Supplemental Letter, Wildscape Restoration, May 9, 2025.

C-5 Review of ISBA Supplement, Rincon Consultants, May 30, 2025.

C-6 Bat Habitat Assessment, Endemic Environmental Services, Inc.

C-7 Arborist Report, Stantec, February 16, 2022, updated August 30, 2022.

1. Regulatory Framework

a) Sensitive Status Species Regulations

i) Federally Protected Species

Ventura County is home to 29 federally listed endangered and threatened plant and wildlife species. The U.S. Fish and Wildlife Service (USFWS) regulates the protection of federally listed endangered and threatened plant and wildlife species.

FE (Federally Endangered): A species that is in danger of extinction throughout all or a significant portion of its range.

FT (Federally Threatened): A species that is likely to become endangered in the foreseeable future.

FC (Federal Candidate): A species for which USFWS has sufficient information on its biological status and threats to propose it as endangered or threatened under the Endangered Species Act (ESA), but for which development of a proposed listing regulation is precluded by other higher priority listing activities.

FSC (Federal Species of Concern): A species under consideration for listing, for which there is insufficient information to support listing at this time. These species may or may not be listed in the future, and many of these species were formerly recognized as "Category-2 Candidate" species.

The USFWS requires permits for the "take" of any federally listed endangered or threatened species. "Take" is defined by the USFWS as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct; may include significant habitat modification or degradation if it kills or injures wildlife by significantly impairing essential behavioral patterns including breeding, feeding, or sheltering."

The Endangered Species Act (ESA) does not provide statutory protection for candidate species or species of concern, but USFWS encourages conservation efforts to protect these species. USFWS can set up voluntary Candidate Conservation Agreements and Assurances, which provide non-Federal landowners (public and private) with the assurance that if they implement various conservation activities to protect a given candidate species, they would not be subject to additional restrictions if the species becomes listed under the ESA.

ii) State Protected Species

The California Department of Fish and Wildlife (CDFW) regulates the protection of endangered, threatened, and fully protected species listed under the California Endangered Species Act. Some species may be jointly listed under the State and Federal Endangered Species Acts.

SE (California Endangered): A native species or subspecies that is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

ST (California Threatened): A native species or subspecies that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as "rare" on or before January 1, 1985, is a "threatened species."

SFP (California Fully Protected Species): This designation originated from the State's initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, mammals, amphibians, reptiles, and birds. Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations.

SR (California Rare): A species, subspecies, or variety of plant is rare under the Native Plant Protection Act when, although not presently threatened with extinction, it is in such small numbers throughout its range that it may become endangered if its present

environment worsens. Animals are no longer listed as rare; all animals listed as rare before 1985 have been listed as threatened.

SSC (California Species of Special Concern): Animals that are not listed under the California Endangered Species Act, but which nonetheless 1) are declining at a rate that could result in listing, or 2) historically occurred in low numbers and known threats to their persistence currently exist.

The CDFW requires permits for the “take” of any State-listed endangered or threatened species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the California Fish and Wildlife Commission determines to be endangered or threatened. “Take” is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

The California Native Plant Protection Act protects endangered and rare plants of California. California Fish and Game Code Section 1908, which regulates plants listed under this act, states: “no person shall import into this state, or take, possess, or sell within this state, except as incident to the possession or sale of the real property on which the plant is growing, any native plant, or any part or product thereof, that the commission determines to be an endangered native plant or rare native plant, except as otherwise provided in this chapter.”

Unlike endangered, threatened, and rare species, for which a take permit may be issued, California Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

The California Endangered Species Act does not provide statutory protection for California species of special concern, but they should be considered during the environmental review process.

A. California Rare Plant Ranks

Plants with 1A, 1B, 2, or 4 should always be addressed in CEQA documents. Plants with a Rare Plant Rank (RPR) 3 do not need to be addressed in CEQA documents unless there is sufficient information to demonstrate that a RPR 3 plant meets the criteria to be listed as a RPR 1, 2, or 4.

RPR 1A: Plants presumed to be extinct because they have not been seen or collected in the wild in California for many years. This list includes plants that are presumed extinct in California, as well as those plants that are presumed extirpated in California. A plant is extinct in California if it no longer occurs in or outside of California. A plant that is extirpated from California has been eliminated from California but may still occur elsewhere in its range.

RPR 1B: Plants that are rare throughout their range with the majority of them endemic to California. Most of the plants of List 1B have declined significantly over the last century.

RPR 2: Plants that are rare throughout their range in California but are more common beyond the boundaries of California. List 2 recognizes the importance of protecting the geographic range of widespread species.

Plants identified as RPR 1A, 1B, and 2 meet the definitions of Sec. 1901, Chapter 10 (Native Plant Protection Act) or Secs. 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code and are eligible for state listing.

RPR 3: A review list for plants for which there is inadequate information to assign them to one of the other lists or to reject them.

RPR 4: A watch list for plants that are of limited distribution in California.

B. Global and Subnational Rankings

Though not associated directly with legal protections, species have been given a conservation status rank by NatureServe, an international non-profit conservation organization that is the leading source for information about rare and endangered species and threatened ecosystems. The Ventura County Planning Division considers the following ranks as sensitive for the purposes of CEQA impact assessment (G = Global, S = Subnational or State):

G1 or S1 - Critically Imperiled

G2 or S2 – Imperiled

G3 or S3 - Vulnerable to extirpation or extinction

iii) Migratory Bird Regulations

The Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game (F&G) Code (3503, 3503.5, 3511, 3513, and 3800) protect most native birds. In addition, the federal and state endangered species acts protect some bird species listed as threatened or endangered. Project-related impacts to birds protected by these regulations would normally occur during the breeding season, because unlike adult birds, eggs, and chicks are unable to escape impacts.

The MBTA implements various treaties and conventions between the U.S. and Canada, Japan, Mexico, and Russia for the protection of migratory birds, which occur in two of these countries over the course of one year. The Act maintains that it is unlawful to pursue, hunt, take, capture, or kill; attempt to take, capture, or kill; possess, offer to or sell, barter, purchase, deliver, or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product, manufactured or not. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds.

CDFG Code 3513 upholds the MBTA by prohibiting any take or possession of birds that are designated by the MBTA as migratory nongame birds except as allowed by federal rules and regulations promulgated pursuant to the MBTA. In addition, there are F&G Codes (3503, 3503.5, 3511, and 3800), which further protect nesting birds and their parts, including passerine birds, raptors, and state "fully protected" birds.

NOTE: These regulations protect almost all *native nesting birds*, not just sensitive status birds.

iv) Plant Community Regulations

Plant communities are provided legal protection when they provide habitat for protected species or when the community is in the coastal zone and qualifies as an environmentally sensitive habitat area (ESHA). Laws that provide legal protection for plants include the California Endangered Species Act, Oak Woodlands Conservation Act, Section 1602 of the California Fish and Game Code, the Porter-Cologne Water Quality Control Act, and Section 404 of the Clean Water Act.

v) Plant Community Rankings

Though not associated directly with legal protections, plant communities have been given a conservation status rank by NatureServe, an international non-profit conservation organization that is the leading source for information about rare and endangered species and threatened ecosystems. The Ventura County Planning Division considers the following ranks as sensitive for the purposes of CEQA impact assessment (G = Global, S = Subnational or State):

G1 or S1 - Critically Imperiled

G2 or S2 - Imperiled

G3 or S3 - Vulnerable to extirpation or extinction

vi) CDFW Rare

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. Though the Native Plant Protection Act and the California Endangered Species Act provide no legal protection to plant communities, CDFW considers plant communities that are ranked G1-G3 or S1-S3 (as defined above) to be rare or sensitive. Thus, these plant communities should be addressed during CEQA review.

vii) Environmentally Sensitive Habitat Areas

The Coastal Act specifically calls for the protection of "environmentally sensitive habitat areas" or ESHA, which it defines as: "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

ESHA has been specifically defined in the Santa Monica Mountains.[1] However, as the Project Site is not located within a Coastal Zone, the ESHA designations do not apply.

viii) Tree Regulations

Selected trees are protected by the Ventura County Tree Protection Ordinance, found in Section 8107-25 of the Ventura County Non-Coastal Zoning Ordinance. This ordinance, which applies in the unincorporated areas of the County outside the coastal zone, regulates—through a tree permit program—the removal, trimming of branches or roots, or grading or excavating within the root zone of a "protected tree." Individual trees are the focus of the ordinance, while oak woodlands are additionally protected as "locally important communities."

To accommodate reasonable development, the ordinance allows removal of five protected trees (only three of which can be oaks or sycamores; none of which can be heritage or historical trees) through a ministerial permit process. Removal of more/other than this triggers a discretionary tree permit.

If a proposed project cannot avoid impacts to protected trees, mitigation of these impacts (such as replacement of lost trees) is addressed through the tree permit process, unless the impacts may affect biological resources beyond the tree itself, such as to sensitive status species that may be using the tree, nesting birds, the tree's role as part of a larger habitat, etc. These secondary impacts have not been addressed through the tree permit program and must be addressed by the biologist in the biological assessment in accordance with CEQA.

A tree permit does not substitute as mitigation for impacts to oak woodlands. The Public Resources Code requires that when a county is determining the applicability of CEQA to a project, it must determine whether that project "may result in a conversion of oak woodlands that will have a significant effect on the environment." If such effects (either individual impacts or cumulative) are identified, the law requires that they be mitigated. Acceptable mitigation measures include but are not limited to, the conservation of other oak woodlands using conservation easements and planting replacement trees, which must be maintained for seven years. In addition, only 50 percent of the mitigation required for significant impacts to oak woodlands may be fulfilled by replanting oak trees.

Trees listed in Table IV.E-1 are protected in the specified zones. Girth is measured at 4.5 feet from the midpoint between the uphill and downhill sides of the root crown.

[1] See memo from John Dixon to Ventura County titled "Designation of ESHA in the Santa Monica Mountains," dated March 25, 2003.

Table IV.E-1
Ventura County Protected Trees

Common Name/Botanical Name (Genus species)	Girth Standard (Circumference)	Applicable Zones	
		All Base Zones	SRP
Alder (*Alnus* all species)	9.5"		X
Ash (*Fraxinus* all species)	9.5"		X
Bay (*Umbellularia californica*)	9.5"		X
Cottonwood (*Populus* all species)	9.5"		X
Elderberry (*Sambucus* all species)	9.5"		X
Big Cone Douglas Fir (*Pseudotsuga macrocarpa*)	9.5"		X
White Fir (*Abies concolor*)	9.5"		X
Juniper (*Juniperus californica*)	9.5"		X
Maple (*Acer macrophyllum*)	9.5"		X
Oak (Single) (*Quercus* all species)	9.5"	X	X
Oak (Multi) (*Quercus* all species)	6.25"	X	X
Pine (*Pinus* all species)	9.5"		X
Sycamore (*Platanus* all species)	9.5"	X	X
Walnut (*Junglans* all species)	9.5"		X
Historical Tree (any species)	(any size)	X	X
Heritage Tree (any species)	90.0"	X	X

X indicates the zones in which the subject trees are considered protected trees.
1. SRP – Scenic Resource Protection Overlay Zone
2. SHP – Scenic Highway Protection Overlay Zone
3. Any tree or group of trees identified by the County or a city as a landmark or identified on the Federal or California Historic Resources Inventory to be of historical or cultural significance or identified as contributing to a site or structure of historical or cultural significance.
4. Any species of tree with a single trunk of 90 or more inches in girth or with multiple trunks, two of which collectively measure 72 inches in girth or more. Species with naturally thin trunks when full grown or naturally large trunks at an early age, or trees with unnaturally enlarged trunks due to injury or disease must be at least 60 feet tall or 75 years old.

Source: Wildscape Restoration, May 2024. Refer to Appendix C-1 of this Draft EIR.

ix) Waters and Wetlands Regulations

Numerous agencies control what can and cannot be done in or around streams and wetlands. If a project affects an area where water flows, ponds, or is present even part of the year, it is likely to be regulated by one or more agencies. Many wetland or stream projects will require three main permits or approvals (in addition to CEQA compliance). These are:

- 404 Permit (U.S. Army Corps of Engineers)
- 401 Certification (California Regional Water Quality Control Board)
- Streambed Alteration Agreement (California Department of Fish and Game)

Additionally, work within a "redline" watercourse under the jurisdiction of the Ventura County Watershed Protection District would be subject to a Watercourse Permit.

A. 404 Permit (U.S. Army Corps of Engineers)

Most projects that involve streams or wetlands will require a 404 Permit from the U.S. Army Corps of Engineers (USACE). Section 404 of the federal Clean Water Act is the primary federal program regulating activities in wetlands. The Act regulates areas defined as "waters of the United States." For nontidal waters, USACE jurisdiction extends up to what is referred to as the "ordinary high-water mark" as well as to the landward limits of adjacent Corps-defined wetlands, if present. The ordinary high-water mark is an identifiable natural line visible on the bank of a stream or water body that shows the upper limit of typical stream flow or water level. The mark is made from the action of water on the streambank over the course of years.

Permit Triggers: A USACE 404 Permit is triggered by moving (discharging) or placing materials—such as dirt, rock, geotextiles, concrete, or culverts—into or within USACE jurisdictional areas. This type of activity is also referred to as a "discharge of dredged or fill material."

B. 401 Certification (Regional Water Quality Control Board)

If a project requires a USACE 404 Permit, then a Regional Water Quality Control Board (RWQCB) 401 Certification is also needed. The Federal Clean Water Act, in Section 401, specifies that states must certify that any activity subject to a permit issued by a federal agency, such as the USACE, meets all state water quality standards. In California, the state and regional water boards are responsible for the certification of activities subject to USACE Section 404 Permits.

Permit Trigger: A RWQCB 401 Certification is triggered whenever a USACE 404 Permit is required, or whenever an activity could cause a discharge of dredged or fill material into waters of the U.S. or wetlands.

C. Streambed Alteration Agreement (California Department of Fish and Wildlife)

If a project includes alteration of the bed, banks, or channel of a stream, or the adjacent riparian vegetation, then a Streambed Alteration Agreement from CDFW may also be required. The Fish and Game Code, Sections 1600-1616, regulates activities that would alter the flow, bed, banks, channel, or associated riparian areas of a river, stream, or lake. The law requires any person, state or local governmental agency, or public utility to notify CDFW before beginning an activity that will substantially modify a river, stream, or lake.

Permit Triggers: A Streambed Alteration Agreement (SAA) is triggered when a project involves altering a stream or disturbing riparian vegetation, including any of the following activities:

- Substantially obstructing or diverting the natural flow of a river, stream, or lake
- Using any material from these areas

- Disposing of waste where it can move into these areas

x) Ventura County General Plan

The Ventura County General Plan contains policies that also strongly protect biological resources.

COS-1.1 Protection of Sensitive Biological Resources

The County shall ensure that discretionary development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making authority.

COS-1.2 Consideration of Sensitive Biological Resources

The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources.

COS-1.3 Wildlife Corridor Crossing Structures

Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges, shall incorporate all feasible measures to accommodate wildlife passage.

COS-1.4 Consideration of Impacts to Wildlife Movement

When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles).

COS-1.6 Discretionary Development on Hillsides and Slopes

The County shall require discretionary development on hillsides and slopes, which have an average natural slope of 20 percent or greater in the area where the proposed development would occur, to be sited and designed in a manner that will minimize grading, alteration of natural land forms, and vegetation removal to avoid significant impacts to sensitive biological resources to the extent feasible.

COS-1.7 Balancing Resource Preservation and Flood Protection

The County shall require that discretionary development and County-initiated projects balance the preservation of streams, wetlands, and riparian habitats with the need to adequately protect public safety and property from flooding hazards by incorporating natural or nature-based flood control infrastructure, (e.g., wetland restoration, soil conservation, vegetated levees), when feasible.

COS-1.8 Bridge Crossing Design

The County shall require discretionary development that includes new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible.

COS-1.9 Agency Consultation Regarding Biological Resources

The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized.

COS-1.10 Evaluation of Potential Impacts of Discretionary Development on Wetlands

The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of the County's Initial Study Assessment Guidelines.

COS-1.11 Discretionary Development Sited Near Wetlands

The County shall require discretionary development to be sited 100 feet from wetland habitats, except as provided below. The 100-foot setback may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decision-making body based on factors that include, but may not be limited to, soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. Discretionary development that would have a significant impact on a wetland habitat shall be prohibited unless mitigation measures are approved that would reduce the impact to a less than significant level. Notwithstanding the foregoing, discretionary development that would have a significant impact on a wetland habitat on land within a designated Existing Community may be

approved in conjunction with the adoption of a statement of overriding considerations by the decision-making authority.

COS-1.12 Discretionary Development and Landscaping

The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELO), to be water-efficient and include native, pollinator-friendly plants consistent with WELO guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock.

xi) Wildlife Migration Regulations

The Ventura County General Plan specifically includes wildlife migration corridors as an element of the region's significant biological resources. In addition, protecting habitat connectivity is critical to the success of special-status species and other biological resource protections. Potential project impacts to wildlife migration are analyzed by biologists on a case-by-case basis. The issue involves both a macro-scale analysis—where routes used by large carnivores connecting very large core habitat areas may be impacted—as well as a micro-scale analysis—where a road or stream crossing may impact localized movement by many different animals. The Non-Coastal Zoning Ordinance (NCZO) contains Habitat Connectivity and Wildlife Corridor (HCWC), and Critical Wildlife Passage Area (CWPA) overlay zones, which include siting, fencing, and wildlife requirements. However, the Project Site is not located within the boundaries of either of these overlay zones, nor is the Project Site within a County-designated wildlife corridor.

xii) Locally Important Species

Locally important species/communities are considered to be significant biological resources in the Ventura County General Plan The Ventura County General Plan defines a Locally Important Species as a plant or animal species that is not an endangered, threatened, or rare, but is considered by qualified biologists to be a quality example or unique species within the County and region. The following criteria further define what locally qualified biologists have determined to be Locally Important Species:

A. Locally Important Animal Species Criteria

Taxa for which habitat in Ventura County is crucial for their existence either globally or in Ventura County. This includes:

- Taxa for which the population(s) in Ventura County represents 10 percent or more of the known extant global distribution; or

- Taxa for which there are five or fewer element occurrences, or less than 1,000 individuals, or less than 2,000 acres of habitat that sustains populations in Ventura County; or

- Native taxa that are generally declining throughout their range or are in danger of extirpation in Ventura County.

B. Locally Important Plant Species Criteria

- Taxa that are declining throughout the extent of their range AND have five (5) or fewer element occurrences in Ventura County.

The County maintains a list of locally important species, which can be found on the Planning Division website at: http://www.ventura.org/rma/planning/ceqa/bioresourcereview.html. *This list should not be considered comprehensive.* Any species that meets the criteria qualifies as locally important, whether or not it is included on this list.

xiii) Locally Important Communities

The Ventura County Initial Study Assessment Guidelines defines a locally important community as one that is considered by qualified biologists to be a quality example characteristic of or unique to the County or region, with this determination being made on a case-by-case basis. The County has not developed a list of locally important communities. Oak woodlands have however been deemed by the Ventura County Board of Supervisors to be a locally important community.

The state passed legislation in 2001, the Oak Woodland Conservation Act, to emphasize that oak woodlands are a vital and threatened statewide resource. In response, the County of Ventura prepared and adopted an Oak Woodland Management Plan that recommended, among other things, amending the County's Initial Study Assessment Guidelines to include an explicit reference to oak woodlands as part of its definition of locally important communities. The Board of Supervisors approved this management plan and its recommendations.

2. Environmental Setting

a) Existing Conditions

i) Survey Area 1

A. Location and Environmental Setting

Survey Area 1 (SA1), surveyed entirely on February 16, 2022, is one contiguous polygon located at the bottom of a small canyon, consisting of the existing camp development area as well as the Project Construction Footprint (including Fuel Modification Zones) and overlapping 300-ft buffers. The boundary of SA1 is shown on Figure IV.E-1.

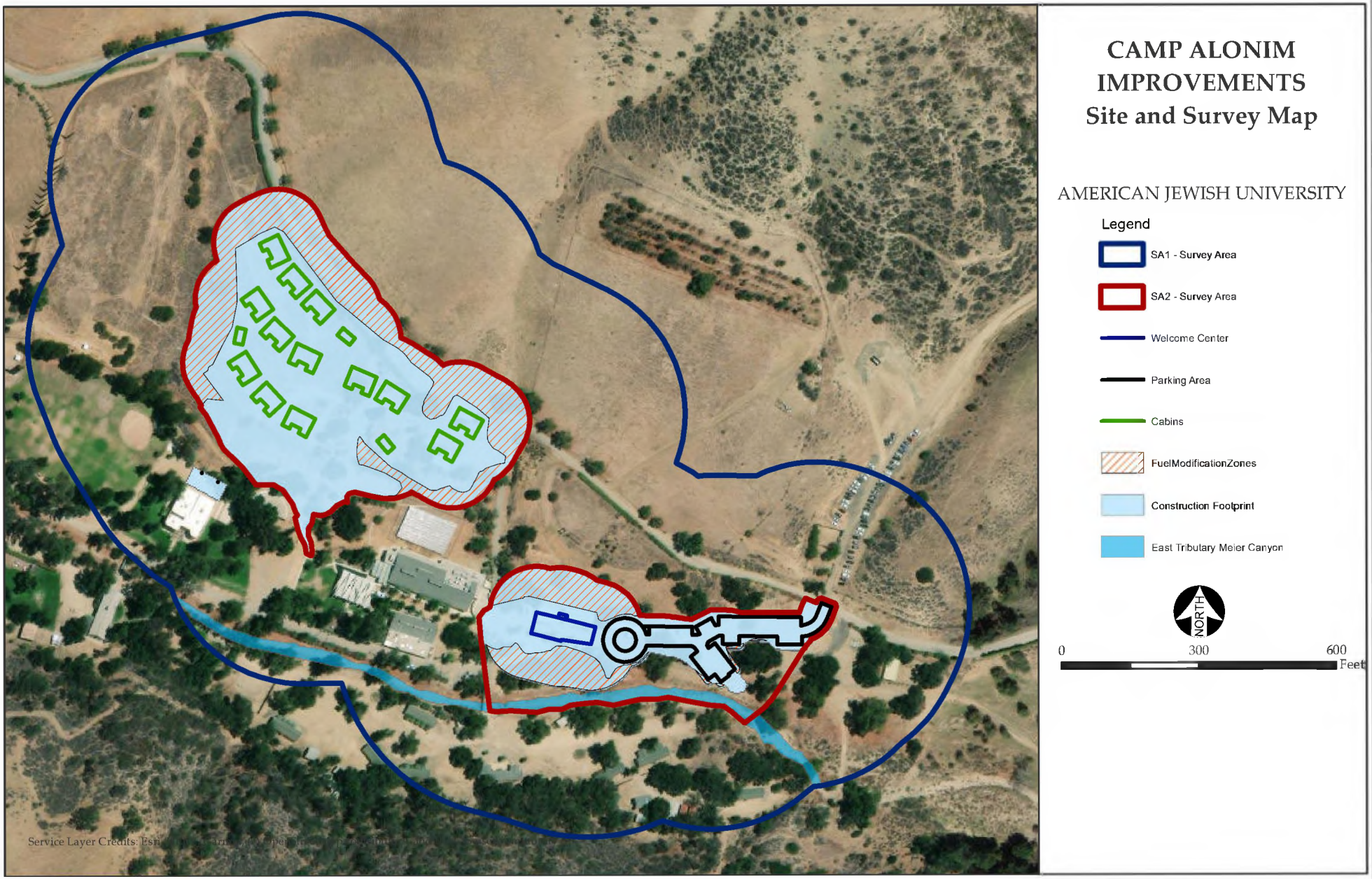


Figure IV.E-1
Site and Survey Map

Source: Wildscape Restoration, 2022.

The current condition of the cabin area is a mix of semi-natural stands of black mustard (*Brassica nigra*), summer mustard (*Hirschfeldia incana*), non-native annual grasses, and sparse native herbaceous species intermixed. On the adjacent drainage to the northwest, the same species occur. This area looks like it is frequently cleared. The grade changes from the terrace to a grassy slope on the north side of the proposed cabin development on the other side of the road.

The area where the proposed cabins would be constructed is up on a terrace above the rest of the camp, while the Welcome Center is on the southeastern part of the camp (in SA2, which as described below and as shown on Figure IV.E-1, is within SA1).

West and south of the proposed cabin development are buildings and developed land for camp activities, including dining halls, sports fields, and a pool. The landscape across the site is a mix of ornamental landscaping, turf, planted non-native trees, and pre-existing native trees. The proposed parking lot currently is in a location that has dirt roads surrounding mature coast live oaks that are used as passage to the trails and roads north and east of the camp, and to access the east side of the property.

South of the proposed parking lot is an ephemeral stream (East Tributary Meier Canyon). The stretch that abuts the parking lot development is degraded with sporadic non-native weedy species in between the cobble. While mature California sycamores (*Platanus racemosa*) grow along both sides of the stream, the streambed lacks riparian vegetation and has no obligate wetland species. *Eucalyptus* spp. line the banks downstream. The ephemeral stream feeds into the Meier Canyon, which flows into channelized Arroyo Simi. East of the proposed parking lot is the upstream portion of the ephemeral stream that is fed from drainages in the adjacent Simi Hills.

On the south-southwest side of the stream, there are existing cabins that would remain in place. Surrounding the cabins are mature coast live oaks (*Quercus agrifolia*), and California sycamore. Behind the existing cabins up the southern slope is a mix of coast live oak, California sycamores, and in the understory a mix of non-native annual grasses. Further up the slope becomes scrub oak woodland alliance.

SA1 as described above includes a 100-foot Fuel Modification Zone, and then an additional 300-foot buffer. Subsequent to the surveys of the Project Site, the Ventura County Fire Department (VCFD) required a 200-foot Fuel Modification Zone from buildings in lieu of the 100 feet normally required (see Mitigation Measure MM-FIRE-1, in Section IV.M, Public Services, of this Draft EIR). Therefore, SA1 now includes a 200-foot Fuel Modification Zone and an additional 200-foot buffer, as discussed in the ISBA Supplement, which is included in Appendix C-4 of this Draft EIR.

B. Surrounding Area Environmental Setting

North of the proposed cabin development is grassland that is used for grazing cattle. Further northwest of the camp approximately 0.5 miles is the City of Simi Valley. The area is developed with commercial buildings and residential neighborhoods. Due west of the camp approximately 1.3 miles over the ridge is another large residential development. South and east of the camp are

the Simi Hills Mountain Range that has a mix of coast live oak woodland/forest alliance, scrub oak (*Quercus berberidifolia*) woodland/forest alliance, and purple sage (*Salvia leucophylla*) shrubland alliance.

ii) Survey Area 2

A. Location and Environmental Setting

Survey Area 2 (SA2), where seasonal botanical surveys were conducted on April 13, May 10, and July 13, 2022, comprises the Project Construction Footprint (including the proposed cabin area, Welcome Center, and parking lot), as well as a stretch of the ephemeral stream running south of the proposed Welcome Center and parking lot (refer to Figure IV.E-1). SA2 is located entirely within the borders of SA1 (refer to Figure IV.E-1). During the botanical surveys, biologists conducted meandering transects to provide visual coverage of the entire Project Construction Footprint, with special attention to habitats where special-status species were most likely to occur. Any wildlife species seen or heard, or wildlife sign observed during these surveys were also recorded.

B. Surrounding Area Environmental Setting

The general environmental setting of SA2 is the same as SA1. The Project Construction Footprint of the proposed cabin area is bordered by existing Camp Alonim buildings, landscaped areas, and recreational fields to the south and east, agricultural grazing fields to the north, and undeveloped semi-natural grassland to the west.

The Project Construction Footprint of the proposed Welcome Center and parking lot and adjacent ephemeral stream are bordered by existing camper cabins to the south, existing Camp Alonim buildings and paved roads to the west, grazing fields to the northeast, and Camp recreational areas and upstream areas of East Tributary Meier Canyon to the southeast.

b) Site Survey/Methodology

Site surveys were conducted on February 1, February 16, April 13, May 10, and July 13, 2022. The survey on February 1, 2022, was a meeting with the client's representative to walk the site and understand the Project limits and proposed development. A biological assessment survey of SA1 was conducted on February 16, 2022, and seasonal botanical surveys of SA2 were conducted on April 13, May 10, and July 13, 2022. Following recommendations made by the CDFW, qualified bat specialists conducted a bat habitat assessment within and adjacent to the Project Construction Footprint (SA2) on March 12, 2024.

Prior to the field survey on February 16, database search of the *California Natural Diversity Database* was conducted to obtain occurrence information for special-status species with the potential to occur within the survey area. The Santa Susana quadrangle and the surrounding eight quadrangles were searched in the CNDDB. Additional databases and standard field references

were searched to build the list of species and communities, which could be potentially encountered during the field survey. Most of the survey area was traversed with meandering transects to obtain representative samples of the habitats, except up the southern slope behind the existing cabins due to the density of the vegetation and steepness of the grade. The slopes for grazing were not walked due to the presence of cattle. These outer boundaries of the survey area were viewed from a distance rather than entered on foot.

Field equipment included a pair of 10x42 binoculars, a phone camera, a handheld Global Positioning System (GPS) unit, DBH (diameter-at-breast-height) tape, and detailed aerial photographs. GPS locations were later cross-checked against visible landmarks shown on aerial photographs and edited, if necessary, to compensate for canopy interference or other satellite interference. All identifiable plant species were recorded, and all wildlife species and signs of presence (e.g., scat, burrows, tracks) identified by sight and sound were recorded. Standard field references were used. Plant taxonomy follows The Jepson Manual, Second Edition. The surveys were conducted at appropriate times to observe most of the species on-site. In the proposed cabin area, repeat visits allowed for the identification of species flowering at different times of the year, and the perennial shrub species are identifiable the majority of the year. The parcel contains many landscaped non-native ornamental plants, many of which were not identified to species.

c) Biological Inventory

i) Major Plant Communities Summary

Major plant communities identified on the Project Site are described below and in Table IV.E-2 and depicted in Figure IV.E-2.

PC01 – Black Mustard-Ripgut Brome Herbaceous Association (California Annual Grassland/Herbaceous Alliance): This herbaceous alliance is often co-dominated by ripgut brome (*Bromus diandrus)* and black mustard in the herbaceous layer. It is approximately 8.55 acres spanning most of the proposed cabin development and northwest of the development.

This area is frequently mowed and has a dense carpet of non-native herbaceous species such as black mustard, summer mustard, filaree (*Erodium* spp.), wild oat grass (*Avena fatua*), bromes (*Bromus* spp.) and tocalote (*Centaurea melitensis*). There was an intermittent specimen of the native annual species Menzie's fiddleneck (*Amsinckia menziesii*). On the southern slope, there were intermittent specimens of purple-needle grass (*Stipa pulchra*). Three patches of Catalina mariposa lilies (*Calochortus catalinae*), California Rare Plant Rank 4.2, were observed blooming within this plant community in proximity to native Palmer's goldenbush (*Ericameria palmeri)* and purple sage (*Salvia leucophylla)*. Overall, this plant community is disturbed by past mowing and grazing activity.

Table IV.E-2
Plant Communities Table

Plant Communities								
Map Key (1)	**SVC Alliance**	**SVC Association**	**Misc. (2)**	**Status (3)**	**Condition (4)**	**Acres Total**	**Acres Impacted**	**Comments (5)**
PC01	California Annual Grassland/ Herbaceous Alliance	Black Mustard-Ripgut Brome Herbaceous Association		-	Disturbed	8.55	5.25	Grazing and mowing for brush clearance
PC02	*Quercus agrifolia* Woodland Alliance	*Quercus agrifolia*/Annual Grass-Herb Woodland/Forest Association		-	Disturbed	4.86	0.21	The trees are surrounding the existing cabin development
PC03	*Quercus agrifolia* Woodland Alliance	*Quercus agrifolia*/ Annual Grass-Herb Woodland/Forest Association		-	Intact	0.71	0	Up the slope from the cabin development; no disturbance, no hiking
PC04	California Sycamore Woodland/Forest Alliance	*Platanus Racemosa/Quercus agrifolia* South Coast Woodland/Forest Association		G3S3	Disturbed	3.85	1.35	These trees are surrounded by the existing roads, playground, and development
PC05	Coast Live Oak Woodland/Forest Alliance	*Quercus agrifolia*/ Annual Grass-Herb Woodland/Forest Association			Disturbed	2.12	1.66	Trees and herbaceous understory located north of proposed Welcome Center, near existing Garden.
PC06	Coast Live Oak Woodland/Forest Alliance	*Quercus agrifolia*/ *Quercus berberidifolia* Woodland/Forest Association		G3S3	Disturbed	0.39	0.39	Disturbed by the development, likely planted with ornamentals
PC07	*Artemisia californica-Salvia leucophylla* Shrubland Alliance	California Sagebrush - Purple Sage Shrubland Association		G4S4	Intact	0.49	0	Small intact patch surrounded by disturbed area
PC08	*Quercus berberidifolia* Shrubland Alliance	Scrub Oak Shrubland Association		G4S4	Intact	0.35	0	Small intact patch surrounded by disturbed area
PC09	*Artemisia californica* Shrubland Alliance	California Sagebrush Shrubland Association		G4S4	Intact	0.26	0.26	Small intact patch surrounded by disturbed area
PC10	*Salvia leucophylla* Shrubland Alliance	Purple Sage Shrubland Association		G4S4	Intact	0.09	0.03	Small intact patch surrounded by disturbed area
PC11	California Annual Grassland/ Herbaceous Alliance	*Brassica nigra – Centaurea melitensis* Herbaceous Association			Disturbed	13.22	3.22	Cattle grazing pasture
PC12			Urban/ Disturbed or Built-Up			10.89	6.02	Existing buildings and vacant areas around buildings

Table IV.E-2
Plant Communities Table

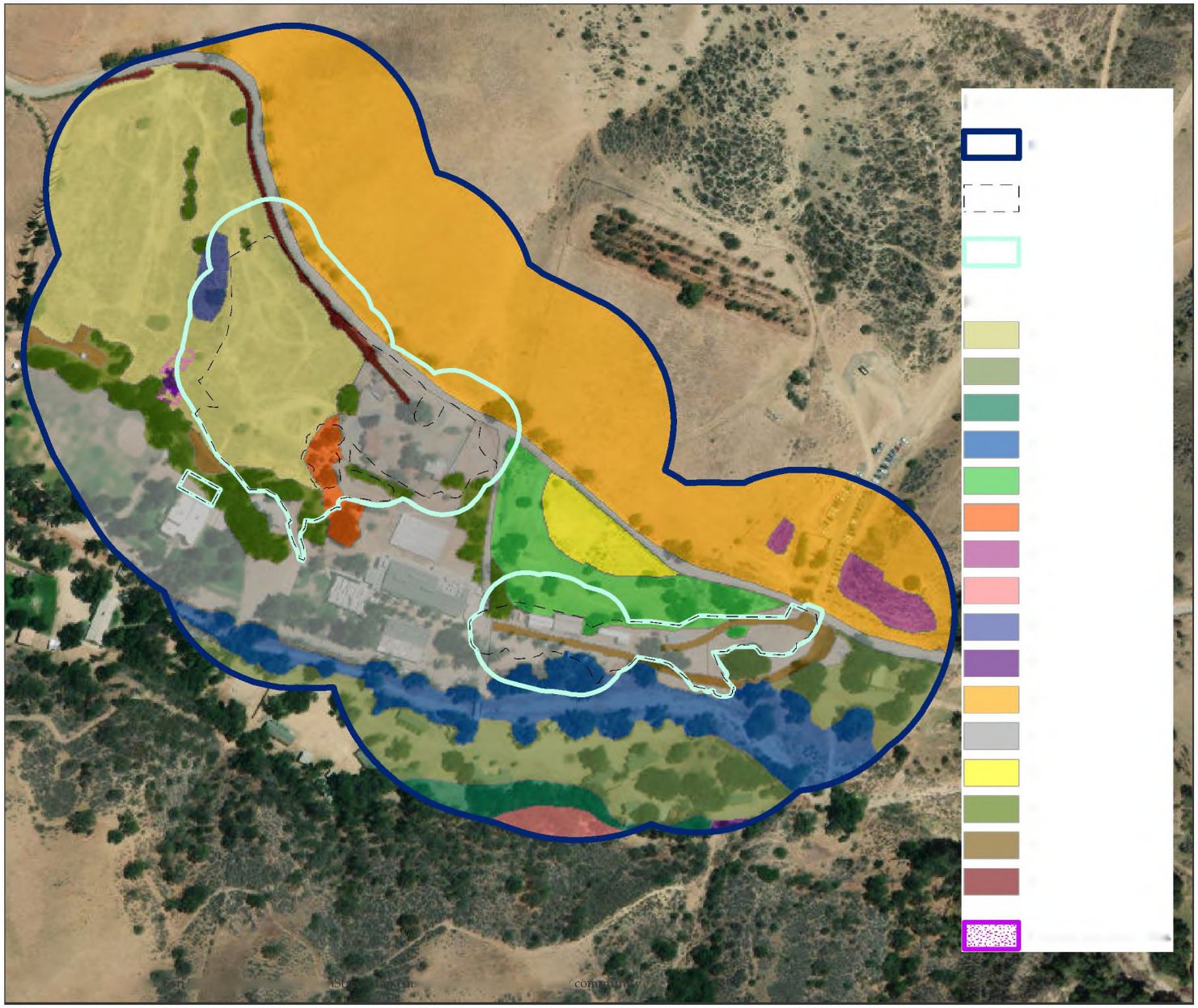
Plant Communities								
PC13			Urban/ Disturbed or Built-Up			0.72	0.3	This area was developed into a garden
PC14			Undifferentiated Exotic Vegetation			2.44	2.01	Trees planted in the landscaped areas; mostly non-native trees
PC15			Cleared Land			0.75	0.43	Existing dirt roads.
PC16			Undifferentiated Ornamental Shrubland			0.40	0.28	Shrubs planted in the landscaped areas around the buildings in planters; some may be native, but the intention was for landscaping

LIC ..... Locally Important Plant Community
ESHA ..... Environmentally Sensitive Habitat Areas (Coastal Zone)
CDFG Rare:
G1 or S1 ..... Critically Imperiled Globally or Subnationally (state)
G2 or S2 ..... Imperiled Globally or Subnationally (state)
G3 or S3 ..... Vulnerable to extirpation or extinction Globally or Subnationally (state)
Cal OWA Protected by the California Oak Woodlands Act

Source: Wildscape Restoration, 2023, updated in 2025 based on the increased Fuel Modification Zone. Refer to Appendix C-1 of this Draft EIR.

PC02 and PC03 – Coast Live Oak/Annual Grass-Herb Woodland/Forest Association (Quercus agrifolia Woodland/Forest Alliance); Disturbed (PC2) and Intact (PC3): PC02 - There is a coast live oak woodland that is approximately 4.86 acres that is disturbed by human activity in the areas primarily south of the stream surrounding the existing cabins. Additionally, the Project Construction Footprint overlaps approximately 0.21 acres of PC02north of the stream.

PC03 is dominated by coast live oak in the tree layer, toyon (*Heteromeles arbutifolia*) in the understory shrub layer, and a variety of grasses and forbs in the herbaceous layer. This alliance is located on the slope behind the existing cabins, and it includes toyon, scrub oak (*Quercus berberidifolia*), and hoary-leaved ceanothus (*Ceanothus crassifolius*). It is intact and thriving and is approximately 0.71 acres of the site. It is in SA1 but would not be impacted by the development.



CAMP ALONIM IMPROVEMENTS

AMERICAN JEWISH UNIVERSITY

Key	Plant Community Type
PC01	Black Mustard - Ripgut Brome
PC02	Coast Live Oak Woodland-Annual Grass-Herb Woodland (Disturbed)
PC03	Coast Live Oak Woodland-Annual Grass-Herb Woodland (Intact)
PC04	California Sycamore-Coast Live Oak Woodland (Disturbed)
PC05	Coast Live Oak-Annual Grass-Herb Woodland (Disturbed)
PC06	Coast Live Oak-Scrub Oak Woodland
PC07	California Sagebrush-Purple Sage Shrubland
PC08	Scrub Oak Shrubland
PC09	California Sagebrush Shrubland
PC10	Purple Sage Shrubland
PC11	Black Mustard - Star Thistle
PC12	Urban/Built-Up (Disturbed)
PC13	Urban/Built-Up (Disturbed) Garden
PC14	Exotic Vegetation
PC15	Cleared Land
PC16	Ornamental Shrubland

NORTH

0 300 600 Feet

Source: Wildscape Restoration, 2022.

Figure IV.E-2
Plant Communities Map

PC05 – Coast Live Oak/Annual Grass-Herb Woodland/Forest Association (*Quercus agrifolia* Woodland/Forest Alliance): Disturbed: PC05 is dominated by coast live oak in the tree layer and ripgut brome and other herbs in the herbaceous layer. The herbaceous layer is diverse and is dominated by ripgut brome. Other herbs often include black mustard, tocalote, horehound (*Marrubium vulgare*) soft brome (*Bromus hordeaceus*), and wild oat grass. These species were observed in the oak woodland that is adjacent to the garden and cattle grazing fields. This area is approximately 2.12 acres and is located north of the proposed Welcome Center and parking lot.

PC06 – Coast Live Oak/Scrub Oak Woodland/Forest Association (*Quercus agrifolia* Woodland/Forest Alliance): Disturbed: PC06 is near the existing house development that would be removed for the cabins. It is characterized by coast live oak in the canopy with scrub oak in the understory. It is approximately 0.39 acres, and it appears that these specimens were planted as part of the development's landscape but are now protected trees. In the understory, there were ornamental landscape species, including agaves and cacti that were not identified or included in the species table. This area is disturbed by the existing development. This is a G3S3 habitat. However, it is not in its pristine condition and is not considered intact.

PC07 - California Sagebrush - Purple Sage Shrubland Association (*Artemisia californica-Salvia leucophylla* Shrubland Alliance): PC07 is characterized by a codominance of California sagebrush and purple sage in the shrub layer with no distinguishing species in the herbaceous layer. This alliance is north of the proposed parking lot development on either side of the road that leads up to the northern roads. The stands are surrounded by oak trees, grazing land, and Peruvian pepper trees (*Schinus molle)*. This community is approximately 0.49 acres.

PC08 – Scrub Oak Shrubland Association (*Quercus berberidifolia* Shrubland Alliance): PC08 is characterized by the strong dominance of scrub oak in the shrub layer. The herbaceous layer is sparse and has no characteristic species. The emergent tree layer includes coast live oak in some stands. This stand is behind the existing cabins higher up the slope. This area was viewed using binoculars due to the steepness of the slope and is fully intact. This area is approximately 0.35 acres.

PC09 - California Sagebrush Shrubland Association (*Artemisia californica* Shrubland Alliance): PC09 is characterized by a dominance of California sagebrush (*Artemisia Californica*) in the shrub layer, and a scattered, mostly nonnative herbaceous layer. This alliance is on the southern and western edges of the proposed cabin development. California sagebrush is the dominant shrub layer. Other species in this community include purple sage, Palmer's goldenbush (*Ericameria palmeri*), black mustard, and wild oat grass. There are a few pepper trees along the drainage, and an African sumac (*Searsia* sp.). This community is approximately 0.26 acres.

PC10 – Purple Sage Shrubland Association (*Salvia leucophylla* Shrubland Alliance): PC10 is characterized by a strong dominance of purple sage in the shrub layer. The herbaceous layer is composed of both native and non-native grasses and herbs. The emergent tree layer is

generally absent. This alliance is on the southwest corner of the proposed cabin development. Species adjacent to this patch included saw-toothed golden bush (*Hazardia squarrosa*), Palmer's goldenbush, and soap plant (*Chlorogalum pomeridianum*). There are hairy milkvetch (*Vicia villosa*) and red maids (*Calandrinia menziesii*) blooming in and around this stand. One of the three patches of Catalina mariposa lily occurred adjacent to this stand.

PC10 is also on other slopes in the survey area and surrounding habitats and is particularly dense on the southern slope behind the existing cabins. This community comprises approximately 0.09 acres of the site.

PC11 - *Brassica nigra Centaurea melitensis* Herbaceous Association (California Annual Grassland/ Herbaceous Alliance): PC11 is the pastureland behind the proposed cabin development that is used for cattle grazing. This is a large part of the survey area that would not be impacted by the development. It is approximately 13.22 acres.

PC12 and PC 13 - Urban/Disturbed or Built-Up: The urban/disturbed or built-up classification includes the buildings and other structures that are on the existing camp development. The developed roads and adjacent planters that abut the buildings are also included in this "built-up" category. PC12 and PC13 comprise approximately 10.89 acres of the survey area. There is also a garden planted with unidentified species occupying approximately 0.72 acres of the survey area.

PC14 - Undifferentiated Exotic Vegetation: There are *Eucalyptus* spp. and *Pinus* spp. that were intentionally planted in this development, along with other non-native trees. There are also shrubs along buildings and in between camp amenities. The exotic vegetation community comprises approximately 2.44 acres of the site along the southern portion of SA1.

PC15 - Cleared Land (Dirt Roads/Vacant areas): PC15 includes dirt roads and vacant patches of dirt that have been previously cleared for the development of the camp. There is approximately 0.75 acres of cleared land within the survey area, 0.43 acres of which falls within the Project Construction Footprint for the proposed Welcome Center and parking lot. The dirt roads in this area were considered cleared instead of developed since they were not asphalt, but rather a decomposed granite, crushed miscellaneous base, or compacted dirt.

PC16 - Undifferentiated Ornamental Shrubland: PC16 is throughout within planters and along buildings. North of the proposed cabin development is a row of shrubs that is used as a privacy screen on a fence line. The mapped Ornamental Shrubland community comprises approximately 0.40 acres.

A. Physical Features

The property and survey areas lack major outcrops, caves, and cliff faces. The proposed cabin development has small rocks scattered throughout, but not significant enough to create habitat.

ii) Waters and Wetlands Summary

Waters and wetlands on and near the Project Site are described below and in Table IV.B-3 (also below) and depicted in Figure IV.E-3.

W1: The Project is situated adjacent to a portion of East Tributary Meier Canyon (W1), an approximately 13,000 linear foot stream originating in the Simi Hills southeast of the Project Site and flowing in a northwest direction into Meier Canyon. Meier Canyon drains into Arroyo Simi approximately 1.2 miles downstream from its confluence with East Tributary Meier Canyon. Arroyo Simi is tributary to Arroyo Las Posas, which is tributary to Calleguas Creek, which terminates at the Pacific Ocean.

The Calleguas Creek Watershed is a relatively low-gradient watershed with historically intermittent natural flows in its waterways (LARWQCB 1994). Surface water flows in Calleguas Creek and its major tributaries have been increased by discharges of treated wastewater and urban and agricultural run-off. Secondary surface waters also flow occasionally in response to rising groundwater and stormwater runoff after rainfall.

East Tributary Meier Canyon appears to have an ephemeral streamflow regime, flowing only during and shortly after precipitation events. Comments received from the Ventura County Resource Management Agency in a Determination of Application Incompleteness dated April 22, 2022, suggested that contrary to findings reported in the original ISBA submission, the stream may actually be intermittent, flowing seasonally and when groundwater provides for stream flow. To collect further data on the flow regime, characteristics, and potential jurisdictional areas of the stream, a jurisdictional delineation survey was performed on July 13, 2022. The surveyed portion of the stream lacked indicators of the more sustained seasonal flow of an intermittent stream, such as those included in the Arid West Beta Streamflow Determination Assessment Method. No hydrophytic plants (wetland plant classifications of FACW or OBL), aquatic invertebrates, algal cover, or fish were observed during jurisdictional delineation field survey, or during previous surveys conducted in the winter and spring. In addition, Rincon Consultants, the County's contract biologist, provided a peer review of the ISBA and determined that the methodology, analysis, and conclusions of the ISBA are adequate and meet the requirements for an acceptable ISBA (see Appendix C-2 of this Draft EIR).

Colored aerial imagery was also reviewed prior to the jurisdictional field survey to identify potential water features and riparian habitats. Through SA1, East Tributary Meier Canyon has a relatively wide (10-25 feet) bed of sparsely vegetated cobble that was highly visible in colored imagery dating from August 2002 to April 2022. Surface water was not visible in any of the available imagery, which included images taken during different months and seasons of several different years. However, indicators of hydrology, such as low-flow channels, terraces, and changes in vegetation were apparent in the images.

Table IV.E-3
Waters and Wetlands

Map Key (1)	Wetland Type (2)	Wetland Name	Wetland Status (3)	Wetland Size (4)	Hydrologic Status (5)	Primary Water Source (6)
W1	Ephemeral	East tributary Meier Canyon	WPD CDFW USACE	1,258 linear feet within Survey Area, 13,000 linear feet total; 3.85 acres of stream and adjacent California Sycamore Woodland within SA1	Dry	Runoff and precipitation
W2	Drainage	Unnamed	N/A	737 linear feet within Survey Area	Dry	Runoff

Map Key (1)	County Wetland Significance (7)	Wetland Distance from Project Site (8)	Comments (9)
W1	Not Significant	Within Project Construction Footprint	Ephemeral stream drains portion of Simi Hills into Meier Canyon, a tributary to Arroyo Simi. Apart from mature California sycamore trees growing landward of the stream banks, the stream supports little to no riparian vegetation. Upland species grow in the bed of the channel, and primarily non-native *Eucalyptus* sp. line the channel downstream of the Project area. No wetlands were observed within or adjacent to W1. No hydric soils, hydrophytic vegetation, or aquatic species were observed during surveys.
W2	Not Significant	50 feet	This drainage is a depression next to the proposed cabin development that can direct water, but there are no hydrological indicators, no hydrophytic vegetation, nor hydric soils.

WPD = County Watershed Protection District (red-line stream)
CDFW = California Department of Fish and Wildlife
USACE = US Army Corps of Engineers

Source: Wildscape Restoration, May 2024. Refer to Appendix C-1 of this Draft EIR.

While surface water was not observed at East Tributary Meier Canyon during any site visits, past flow was evident. The stream had well-defined bed and banks, and observations of drift deposits, sediment build up, changes in vegetation, and shelving along the banks allowing surveyors to identify the Ordinary High-Water Marks that define the extent of the active floodplain at each sampling area.

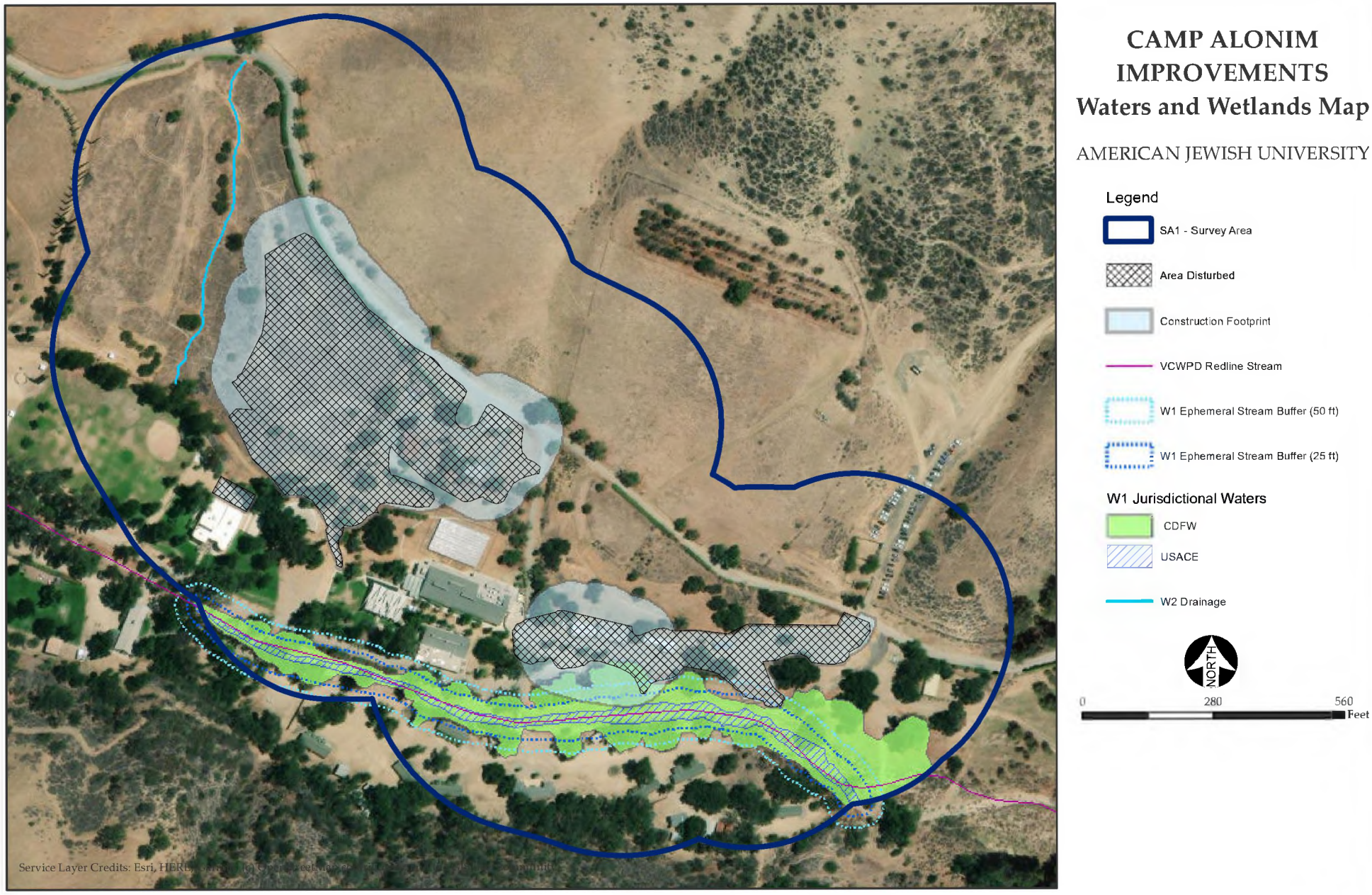


Figure IV.E-3
Waters and Wetlands Map

Source: Wildscape Restoration, 2022.

The East Tributary Meier Canyon stream channel is south of the proposed Welcome Center and parking lot. The area currently contains a dirt road and parking area, staff buildings, and a small play area. Intact riparian vegetation within or along the streambed is sparse. There were a few mule fat (*Baccharis salicifolia*) specimens in the creek directly south of the proposed parking lot development, and more specimens were observed in the upstream extent.

There are upland scrub species on the sandbars in the bed of the channel and along the southern bank such as California buckwheat (*Eriogonum fasciculatum*) and scale broom (*Lepidospartum squamatum*). Along the upper banks near the Project Construction Footprint, there are coast live oaks and California sycamores; further downstream there are eucalyptus and other landscape trees line the upper banks. Miscellaneous debris, old culverts, and other unidentified legacy trash were found in the stream bed. A built-up and leveled dirt mound is currently used by campers as a streambed crossing. Habitat in and adjacent to the stream is degraded and lacks sufficient water to support fish or amphibians.

While the proposed Welcome Center building is setback approximately 100 – 136 feet from the East Tributary Meier Canyon bank, much of the proposed parking lot falls within 100 feet of the stream and a portion of the lot approaches within approximately 10 feet of the bank. When the stream border's definition is broadened to include mature sycamores growing landward of the banks as potential indicators of riparian habitat, there is direct overlap with the Project Construction Footprint.

The current edge of the bank sustains a drivable dirt road, and the area is already used for parking and frequented by cattle ranchers and campers. A 25- to 50-foot buffer from the bank is recommended. However, a geotechnical engineer should determine the setback necessary to protect the structural integrity of the bank.[2]

Within SA1, portions of East Tributary Meier Canyon may fall under the jurisdiction of federal, state, and/or county regulatory agencies. The Ordinary High-Water Mark observed in the streambed during the July 13, 2022, jurisdictional delineation survey to hand-draw was used, and the limits of waters potentially falling under USACE jurisdiction within SA1 were digitally mapped. Approximately 0.75 acres (32,799 square feet) of East Tributary Meier Canyon within SA1 could fall under USACE jurisdiction, if USACE determined that the relevant reach has a significant nexus to a Traditional Navigable Water. However, the Project Construction Footprint (including grading areas and Fuel Modification Zones) does not overlap with these waters.

CDFW jurisdiction typically includes the channel, bed, and bank of a stream, and extends to the landward edge of riparian vegetation where it occurs beyond the bank cut. Though hydrophytic vegetation was not observed within the streambed, the California sycamores growing along the landward side of the banks are phreatophytes, deep-rooted plants that draw their water from near the water table. Thus, despite the paucity of other typical riparian vegetation, the California Sycamore-Coast Live Oak South Coast Woodland occurring along East Tributary Meier Canyon

[2] See Figure 8 in the geotechnical report (Appendix E-1).

may be considered riparian and within CDFW jurisdiction. Within SA1, there are approximately 3.85 acres of streambed and contiguous California Sycamore – Coast Live Oak South Coast Woodland that may fall within CDFW jurisdiction (refer to Figure IV.E-3). The Development Footprint of the Project overlaps approximately 0.26 acres of the delineated CDFW jurisdictional area, as some construction activities and landscaping may encroach upon mature California sycamores (refer to Figure IV.E-4). An additional 1.35 acres of the jurisdictional area falls within the 100-foot Fuel Modification Zone required for the proposed Welcome Center.

W2: There is another high gradient drainage that directs water, but it does not likely accumulate water except during rainy periods. The drainage starts at the High Road and ends at the camp development at the bottom of the terrace near the baseball field.

iii) Wildlife Movement and Connectivity

A. Connectivity Features

SA1 (which includes the area of SA2) is not located within a documented wildlife corridor or linkage as shown in Ventura County's Resource Management Agency GIS Data "Regional Wildlife Corridors," but Camp Alonim is situated at the base of the Simi Hills, near their convergence with the Santa Susana Mountains. Nearby, the Simi Hills Critical Wildlife Passage Area south of the Project Site, and the larger Santa Monica-Sierra Madre Regional Wildlife Corridor, comprises large tracts of undeveloped open space that provide linkages to the Santa Monica Mountains, San Gabriel Mountains, and Los Padres National Forest Wildlife. Wildlife moving through these known wildlife passages may venture into the Project Site from the adjacent Simi Hills but are unlikely to travel across the Project Site due to the highly developed and trafficked areas of Simi Valley directly to the north and west. Additionally, the existing level of development, lack of large tracts of contiguous natural vegetation, and high level of human activity at Camp Alonim likely deter many species from crossing the site. Urban-adapted species, with a higher tolerance to human disturbance, may readily traverse the Project Site. For example, coyotes were observed within SA1 during multiple site visits, and one individual was observed crossing the open grassland habitat of the proposed cabin development towards the cattle grazing pasture to the north. Game trails through this area and wildlife scat provide further evidence of wildlife crossings.

Three distinct connectivity features were identified within SA1. The drainage located to the west of the proposed cabin development (W1 / C1), the oak woodland habitat south of the existing cabins (C2), and the East Tributary Meier Canyon streambed (W1 / C3) running to south of the proposed Welcome Center and parking lot.

The southwestern part of the property behind the existing cabins has denser vegetation and greater canopy cover contiguous with open spaces in the adjacent Simi Hills. This portion of the site may be traversed by species such as mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), coyotes (*Canis latrans*), raccoons (*Procyon lotor*), striped skunks (*Mephitis mephitis*) and mule deer (*Odocoileus hemionus*). Mule deer were observed in this area during the ISBA survey.



Source: Wildscape Restoration, 2022.

Figure IV.E-4
Protected Trees Map

The ephemeral stream lacks dense vegetation but provides a linkage from higher elevations upstream in the Simi Hills down into the canyon. There were unidentifiable prints on the sandy bottom of the streambed.

B. Crossing Structures

The following crossings are present on the Project Site:

Meier Canyon:

- Four ford/Arizona crossings;
- One pedestrian bridge; and
- One culverted crossing.

East Tributary Meier Canyon:

- Three ford/Arizona crossings;
- Two pedestrian bridges;
- One vehicular bridge; and
- One culverted crossing.

Wildlife could potentially use the bridges to cross East Tributary Meier Canyon when it is flowing but may be deterred by human activity.

d) Plant and Wildlife Species

i) Observed Species

Plant species detected during the surveys were representative of natural and manmade habitats. Ninety-two plant species were observed within the survey area. Fifty-two (57 percent) are native and forty (43 percent) are non-native. The site had a variety of landscape plants, not all of which were identified by species.

Animal species detected during the surveys were mainly representative of the onsite habitats (mainly non-native California grassland, and Coast live oak and California sycamore woodland, and developed urban areas). Fifty-seven species of wildlife within the survey area were observed/detected, including 42 birds (2 non-native), 6 mammals (2 non-native), 3 native reptiles, and 6 native invertebrates (4 butterflies, 2 grasshopper); dragonflies (Order Odonata) and the webs of funnel weaver spiders (*Family Agelenidae*) were also observed but not identified to species. Ninety-three percent of identified species were native, and 7 percent were non-native (refer to Table IV.E-4). Non-native domestic cattle (*Bos taurus*) were present on the grazing pasture north of the Project area and horses (*Equus caballus*) are ridden and kept on the campgrounds.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Anaxyrus californicus*	arroyo toad	No	No	-	The site is dry most of the year.
-	CNDDB	*Rana boylii*	foothill yellowlegged frog	No	No	-	The site is dry most of the year.
-	CNDDB	*Rana draytonii*	California redlegged frog	No	No	-	The site is dry most of the year.
-	CNDDB	*Spea hammondii*	western spadefoot	No	No	-	The site is dry most of the year.
-	CNDDB	*Taricha torosa*	Coast Range Newt	No	No	-	The site is dry most of the year.
-	CNDDB	*Socalchemmis gertschi*	Gertsch's socalchemmis spider	No	No	-	This spider has only been found in Brentwood and Topanga Canyon.
All Zones	CNDDB	*Accipiter cooperii*	Cooper's hawk	Yes	Yes	10.26	Species may forage, perch, and roost at site.
-	CNDDB	*Accipiter gentilis*	northern goshawk	No	No	-	This site is not close to water; The site is dry most of the year.
-	CNDDB	*Accipiter striatus*	sharp-shinned hawk	No	No	-	This site has no intact riparian areas.
-	CNDDB	*Agelaius tricolor*	tricolored blackbird	No	No	-	This site is dry most of the year and does not have wetland.
PC07 PC09	CNDDB	*Aimophila ruficeps canescens*	Southern-California rufouscrowned sparrow	Yes	Yes	0.22	This site has coastal sage scrub habitat.
PC11	CNDDB	*Ammodramus savannarum*	grasshopper sparrow	Yes	Yes	0.66	There are a variety of grasses and a cattle field.
-	CNDDB	*Aquila chrysaetos*	golden eagle	No	No	-	There are no large mountains or cliffs and there is high human disturbance.
-	CNDDB	*Ardea alba*	great egret	No	No	-	There is no wetland or bodies of water.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Ardea herodias*	great blue heron	No	No	-	There is no wetland or bodies of water.
-	CNDDB	*Artemisiospiza belli belli*	Bell's sage sparrow	No	No	-	There is no chaparral or montane habitat.
-	CNDDB	*Asio flammeus*	short-eared owl	No	No	-	Does not typically occur in this part of the state and there are no wetlands.
-	CNDDB	*Athene cunicularia*	burrowing owl	No	No	-	The site is frequently cleared and disturbed by humans.
All zones	CNDDB	*Buteo regalis*	ferruginous hawk	Yes	Yes	10.26	The site has squirrels that this hawk may hunt.
-	CNDDB	*Buteo swainsoni*	Swainson's hawk	No	No	-	There is no intact riparian habitat present.
All zones	CNDDB	*Calypte costae*	Costa's hummingbird	Yes	Yes	10.26	The site has coastal sage scrub habitat and areas that could be used for perching and feeding.
-	CNDDB	*Chaetura vauxi*	Vaux's swift	No	No	-	There are no lakes, rivers or streams that have water most of the year. Also, no redwood or firs are present.
All zones	CNDDB	*Circus hudsonius*	northern harrier	Yes	Yes	10.26	The site has many perches, roosts, and squirrels.
-	CNDDB	*Coccyzus americanus occidentalis*	western yellow-billed cuckoo	No	No	-	The site has no willows.
-	CNDDB	*Contopus cooperi*	olive-sided flycatcher	No	No	-	The site has no montane forests.
-	CNDDB	*Egretta thula*	snowy egret	No	No	-	The site has no estuaries or wetlands and is dry most of the year.
All zones	CNDDB	*Elanus leucurus*	white-tailed kite	Yes	Yes	10.26	Has open meadows, scattered oaks, and river bottom lands.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Empidonax traillii*	willow flycatcher	No	No	-	The site has no streams with water, standing water or seeps.
-	CNDDB	*Empidonax traillii extimus*	Southwestern willow flycatcher	No	No	-	The site has limited riparian vegetation.
PC01	CNDDB	*Eremophila alpestris actia*	California horned lark	Yes	Yes	3.29	The site has grassy areas.
-	CNDDB	*Falco columbarius*	merlin	No	No	-	The site is dry most of the year.
-	CNDDB	*Falco mexicanus*	prairie falcon	No	No	-	The site has no canyons or cliffs.
All Zones	CNDDB	*Falco peregrinus anatum*	American peregrine falcon	Yes	Yes	10.26	The site perches and roosts and supports potential prey populations.
-	CNDDB	*Gymnogyps californianus*	California condor	No	No	-	Condors typically occur at higher elevations.
-	CNDDB	*Haliaeetus leucocephalus*	bald eagle	No	No	-	The site has no large bodies of water or free flowing rivers with fish.
-	CNDDB	*Icteria virens*	yellow-breasted chat	No	No	-	The site has limited riparian habitat.
PC11	CNDDB	*Lanius ludovicianus*	loggerhead shrike	Yes	Yes	0.66	The site has lots of trees, posts, fences, and utility lines.
-	CNDDB	*Larus californicus*	California Gull	No	No	-	The site is dry most of the year.
-	CNDDB	*Nycticorax nycticorax*	black-crowned night heron	No	No	-	The site is dry most of the year.
-	CNDDB	*Pica nuttalli*	yellow-billed magpie	No	No	-	The site has no riparian habitat.
-	CNDDB	*Piranga flava*	hepatic tanager	No	No	-	Does not typically occur in this part of the state.
-	CNDDB	*Piranga rubra*	summer tanager	No	No	-	The site has no cottonwood or willows.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Plegadis chihi*	white-faced ibis	No	No	-	This site has no wetlands and is dry most of the year.
-	CNDDB	*Polioptila californica californica*	coastal California gnatcatcher	No	No	-	Does not typically occur in this area and this site does not have rocky hillsides.
-	CNDDB	*Riparia riparia*	bank swallow	No	No	-	This site does not have banks/cliffs or riparian habitat.
-	CNDDB	*Selasphorus rufus*	rufous hummingbird	No	No	-	This site does not have chaparral habitat.
PC14	CNDDB	*Setophaga petechia*	yellow warbler	Yes	Yes	0.76	May occur in this site for foraging between habitats because of all the trees.
-	CNDDB	*Spinus lawrencei*	Lawrence's goldfinch	No	No	-	This site is dry most of the year.
-	CNDDB	*Spizella breweri*	Brewer's sparrow	No	No	-	Does not typically occur in this area.
-	CNDDB	*Vireo bellii pusillus*	least Bell's vireo	No	No	-	There is no dense intact riparian vegetation, nor is there around where it has potential to nest
-	CNDDB	*Streptocephalus woottoni*	Riverside fairy shrimp	No	No	-	This site is dry most of the year
-	CNDDB	*Catostomus santaanae*	Santa Ana sucker	No	No	-	This site is dry most of the year
-	CNDDB	*Gasterosteus aculeatus williamsoni*	unarmored threespine stickleback	No	No	-	This site is dry most of the year
-	CNDDB	*Gila orcuttii*	arroyo chub	No	No	-	This site is dry most of the year
-	CNDDB	*Oncorhynchus mykiss irideus pop. 10*	steelhead-southern California DPS	No	No	-	This site is dry most of the year

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Rhinichthys osculus ssp. 8*	Santa Ana speckled dace	No	No	-	This site is dry most of the year
All zones	CNDDB	*Bombus crotchii*	Crotch's bumble bee	Yes	Yes	10.26	Site contains potential nesting and foraging habitat.
PC01 PC14	CNDDB	*Danaus plexippus pop. 1*	monarch-California overwintering population	Yes	Yes	4.05	There are eucalyptus trees on site that could be used for roosting/resting. Native milkweed observed in the disturbed annual grassland provides foraging and breeding habitat for early breeding migratory population
-	CNDDB	*Trimerotropis occidentiloides*	Santa Monica grasshopper	No	No	-	This site contains no chaparral habitat.
PC01 PC02 PC04 PC12	CNDDB	*Antrozous pallidus*	pallid bat	Yes	Yes	7.22-	Suitable roosting and foraging habitat present on site.
-	CNDDB	*Euderma maculatum*	spotted bat	No	No	-	No suitable roosting habitat available and the site has no water most the year.
-	CNDDB	*Eumops perotis californicus*	western mastiff bat	No	No	-	Minor habitat for roosting and no chaparral habitat.
-	CNDDB	*Lasiurus cinereus*	hoary bat	No	No	-	The site is dry most of the year.
-	CNDDB	*Lepus californicus bennettii*	San Diego black- tailed jackrabbit	No	No	-	There is no desert scrub or chaparral habitat.
-	CNDDB	*Macrotus californicus*	California leaf- nosed bat	No	No	-	There is no desert terrain or roosting habitat.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Myotis ciliolabrum*	western small- footed myotis	No	No	-	The site is dry most of the year.
-	CNDDB	*Myotis velifer*	cave myotis	No	No	-	There is no roosting habitat and no riparian habitat.
-	CNDDB	*Neotoma lepida intermedia*	San Diego desert woodrat	No	No	-	There is a moderate canopy of trees but no rocky outcrops, cliffs, or slopes.
PC01 PC11 PC14	CNDDB	*Taxidea taxus*	American badger	Yes	Yes	4.71	Site contains dry open shrubland and woodland habitats, and potential prey (ground squirrels, snakes, and lizards are abundant).
-	CNDDB	*Anodonta californiensis*	California floater	No	No	-	This site is dry most of the year.
-	CNDDB	*Gonidea angulata*	Western ridged mussel	No	No	-	This site is dry most of the year.
-	CNDDB	*Helminthoglypta fontiphila*	Soledad shoulderband	No	No	-	Does not typically occur in this area.
-	CNDDB	*Helminthoglypta traskii pacoimensis*	Pacoima shoulderband	No	No	-	Does not typically occur in this area.
PC04-	CNDDB	*Anniella spp. /Anniella stebbinsi*	California legless lizard / Southern California legless lizard	Yes	Yes	0.36-	May occur in the loose soils and/or leaf litter in the riparian zone along East Tributary Meier Canyon.
-	CNDDB	*Anniella stebbinsi*	Southern California legless lizard	No	No	-	Chaparral habitat is out of the survey area
-	CNDDB	*Arizona elegans occidentalis*	California glossy snake	No	No	-	Chaparral habitat is out of the survey area

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
PC02 PC03 PC04 PC05 PC06 PC07 PC08 PC09 PC10	CNDDB	*Aspidoscelis tigris stejnegeri*	coastal whiptail	Yes	Yes	1.45	There are woodland and scrub habitats on site.
-	CNDDB	*Diadophis punctatus modestus*	San Bernardino ringneck snake	No	No	-	Chaparral habitat is out of the survey area
-	CNDDB	*Emys marmorata*	western pond turtle	No	No	-	There are no permanent bodies of water.
PC02 PC03 PC04 PC05 PC06 PC07 PC08 PC09 PC10	CNDDB	*Phrynosoma blainvillii*	coast horned lizard	Yes	Yes	1.45-	There are woodland and coastal sage scrub habitats on site.
PC01 PC11	CNDDB	*Salvadora hexalepis virgultea*	coast patched-nose snake	Yes	Yes	3.95	There is shrubby and bushy vegetation and small burrowing mammals.
-	CNDDB	*Thamnophis hammondii*	two-striped gartersnake	No	No	-	This site is dry most of the year.
-	CNDDB	*Thamnophis sirtalis pop. 1*	south coast gartersnake	No	No	-	This site is dry most of the year.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
PC07 PC09	CNDDB	*Asplenium vespertinum*	western spleenwort	Yes	Yes	0.22	There is coastal sage scrub habitat, and the elevation is 1100 ft.
PC07 PC09	CNDDB	*Astragalus brauntonii*	Braunton's milk- vetch	Yes	Yes	0.22	There is coastal sage scrub habitat, and the elevation is 1100 ft.
-	CNDDB	*Baccharis malibuensis*	Malibu baccharis	No	No	-	There is coastal sage scrub habitat within the elevation range, but no Conejo volcanic soils present.
PC07 PC09	CNDDB	*Berberis nevinii*	Nevin's barberry	Yes	Yes	0.22	There is coastal sage scrub habitat, and the elevation is 1100 ft.
PC07 PC09	CNDDB	*Calandrinia breweri*	Brewer's calandrinia	Yes	Yes	0.22	There is coastal sage scrub habitat, and the elevation is 1100 ft and there is disturbed habitat.
PC01 PC07 PC09	CNDDB	*Calochortus catalinae*	Catalina mariposa- lily	Yes	Yes	3.51	There is coastal sage scrub habitat, and the elevation is 1100 ft.
PC07 PC09	CNDDB	*Calochortus clavatus var. clavatus*	club-haired mariposa-lily	Yes	Yes	0.22	There is coastal sage scrub habitat, and the elevation is 1100 ft.
-	CNDDB	*Calochortus clavatus var. gracilis*	slender mariposa- lily	No	No	-	Required elevation is too high.
-	CNDDB	*Calochortus fimbriatus*	late-flowered mariposa-lily	No	No	-	Chaparral habitat is out of the survey area
-	CNDDB	*Calochortus palmeri var. palmeri*	Palmer's mariposa- lily	No	No	-	The site is dry most of the year, the required elevation is too high and there is no chaparral habitat in the survey area
-	CNDDB	*Calochortus plummerae*	Plummer's mariposa-lily	No	No	-	There is no chaparral habitat or montane coniferous forest.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Calystegia peirsonii*	Peirson's morning glory	No	No	-	There are no rocky slopes, and the elevation is at the peak and out of the sites range.
	CNDDB	*Cercocarpus betuloides var. blancheae*	island mountain-mahogany	No	No	-	There is no chaparral habitat.
PC07 PC09	CNDDB	*Chorizanthe parryi var. fernandina*	San Fernando Valley spineflower	Yes	Yes	0.22	Occurs in coastal sage scrub at site's elevation.
PC07 PC09	CNDDB	*Chorizanthe parryi var. parryi*	Parry's spineflower	Yes	Yes	0.22	Occurs in coastal sage scrub at site's elevation.
-	CNDDB	*Clarkia exilis*	slender clarkia	No	No	-	There is no foothill woodland and occurs at a very high elevation.
PC07 PC09	CNDDB	*Convolvulus simulans*	small-flowered morning-glory	Yes	Yes	0.22	Occurs in coastal sage scrub at sites elevation.
PC07 PC09	CNDDB	*Deinandra minthornii*	Santa Susana tarplant	Yes	Yes	0.22	Occurs in coastal sage scrub at site's elevation.
-	CNDDB	*Deinandra paniculata*	paniculate tarplant	No	No	-	There is no chaparral or wetland habitat.
-	CNDDB	*Delphinium parryi ssp. blochmaniae*	dune larkspur	No	No	-	There is no chaparral habitat or coastal dunes.
-	CNDDB	*Delphinium parryi ssp. purpureum*	Mt. Pinos larkspur	No	No	-	Required elevation is too high.
PC07 PC09	CNDDB	*Dodecahema leptoceras*	slender-horned spineflower	Yes	Yes	0.22	Occurs in coastal sage scrub at sites elevation.
-	CNDDB	*Dudleya blochmaniae ssp. blochmaniae*	Blochman's dudleya	No	No	-	There are no rocky slopes
-	CNDDB	*Dudleya cymosa ssp. agourensis*	Agoura Hills dudleya	No	No	-	There is no chaparral or volcanic habitat.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Dudleya cymosa ssp. ovatifolia*	Santa Monica dudleya	No	No	-	There are no large slopes or canyons.
PC07 PC09	CNDDB	*Dudleya multicaulis*	many-stemmed dudleya	Yes	Yes	0.22	There is coastal sage scrub habitat.
-	CNDDB	*Dudleya parva*	Conejo dudleya	No	No	-	There are no rocky or volcanic slopes.
-	CNDDB	*Eriogonum crocatum*	Conejo buckwheat	No	No	-	There are no volcanic outcrops.
PC07 PC09	CNDDB	*Harpagonella palmeri*	Palmer's grapplinghook	Yes	Yes	0.22	Occurs in coastal sage scrub at sites elevation.
-	CNDDB	*Helianthus inexpectatus*	Newhall sunflower	No	No	-	There is no willow woodland.
-	CNDDB	*Horkelia cuneata var. puberula*	mesahorkelia	No	No	-	There is no chaparral habitat.
-	CNDDB	*Juglans californica*	southern California black walnut	No	No	-	There are no large slopes or intact riparian areas.
-	CNDDB	*Juncus acutus ssp. leopoldii*	southwestern spiny rush	No	No	-	No salt marsh or alkaline seeps.
-	CNDDB	*Lasthenia glabrata ssp. coulteri*	Coulter's goldfields	No	No	-	The site is dry most of the year. Elevation required is too high.
-	CNDDB	*Lessingia tenuis*	spring lessingia	No	No	-	There is no chaparral habitat.
-	CNDDB	*Lilium humboldtii ssp. ocellatum*	ocellated humboldt lily	No	No	-	There are no riparian areas, montane forest, or chaparral.
PC07 PC09	CNDDB	*Lupinus paynei*	Payne's bush lupine	Yes	Yes	0.22	There is coastal sage scrub habitat.
-	CNDDB	*Monardella hypoleuca ssp. hypoleuca*	white-veined monardella	No	No	-	There is no chaparral habitat.
-	CNDDB	*Navarretia ojaiensis*	Ojai navaretia	No	No	-	There is no chaparral habitat or foothill grassland.

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
-	CNDDB	*Nolina cismontana*	chaparral nolina	No	No	-	Occurs on coastal sage scrub but almost out of the site's elevation.
-	CNDDB	*Opuntia basilaris var. brachyclada*	short-joint beavertail	No	No	-	There is no chaparral habitat.
-	CNDDB	*Navarretia ojaiensis*	Ojai navaretia	No	No	-	There is no chaparral habitat or foothill grassland.
-	CNDDB	*Nolina cismontana*	chaparral nolina	No	No	-	Occurs on coastal sage scrub but almost out of the site's elevation.
-	CNDDB	*Opuntia basilaris var. brachyclada*	short-joint beavertail	No	No	-	There is no chaparral habitat.
-	CNDDB	*Orcuttia californica*	California orcutt grass	No	No	-	There are no vernal pools.
-	CNDDB	*Pentachaeta lyonii*	Lyon's pentachaeta	No	No	-	There is no chaparral habitat or intact foothill grassland.
-	CNDDB	*Phacelia mohavensis*	Mojave phacelia	No	No	-	Required elevation is too high.
-	CNDDB	*Physalis lobata*	lobed ground- cherry	No	No	-	There are no dry lake margins.
PC07 PC09	CNDDB	*Pseudognaphalium leucocephalum*	white rabbit-tobacco	Yes	Yes	0.22	Occurs in coastal scrub.
-	CNDDB	*Senecio aphanactis*	chaparral ragwort	No	No	-	There is no cismontane woodland or dry alkaline flats.
-	CNDDB	*Symphyotrichum greatae*	Greata's aster	No	No	-	There are no canyons.

E *Federal Endangered*
FC… *Federal Candidate Species*
FSC… *Federal Species of Concern*
SFP *California Fully Protected Species*
SE… *California Endangered*
ST… *California Threatened*

Table IV.E-4
Special-status Species Potentially Occurring on the Project Site

Special-status Species Potentially Occurring on the Parcel							
Map Key (1)	**Survey/ Source (2)**	**Scientific Name (3)**	**Common Name (4)**	**Adequate Habitat Onsite (5)**	**Adequate Habitat Size (6)**	**Acreage Impacted (7)**	**Comments (8)**
Wildlife							
SR… California Rare *SSC… California Species of Special Concern* *CDFG/NatureServe Rank* *G1 or S1 - Critically Imperiled Globally or Subnationally (state) G2 or S2 - Imperiled Globally or Subnationally (state)* *G3 or S3 - Vulnerable to extirpation or extinction Globally or Subnationally (state)* *California Rare Plant Rank (RPR)* *RPR 1A - California Native Plant Society/CDFG listed as presumed to be extinct RPR 1B - California Native Plant Society/CDFG listed as rare or endangered in California and elsewhere* *RPR 2 - California Native Plant Society/CDFG listed as rare or endangered in California but more common elsewhere* *RPR 3 - California Native Plant Society/CDFG listed as in need of more information.* *RPR 4 - California Native Plant Society/CDFG listed as of limited distribution or infrequent throughout a broader area in California.* *LIS - Locally Important Species* *Source: Wildscape Restoration, 2023. Refer to Appendix C-1 of this Draft EIR.*							

ii) Protected Trees

Protected tree data for the Project is based on a tree survey and arborist report completed by Stantec in February 2022 and updated August 30, 2022 (included in Appendix C-7 of this Draft EIR). Stantec surveyed trees within 50 feet of the Project Construction Footprint to determine whether they were protected. Figure IV.E-4 includes the locations of all the identified protected trees. Table IV.E-5 lists each protected tree with its species, circumference, and anticipated level of Project impacts. The 300-foot buffer surrounding the Project Construction Footprint was not fully surveyed for the arborist report, as trees outside of the Project Construction Footprint were not considered to be at risk of being encroached upon or removed. The vegetation communities map describes other native trees and the surrounding communities throughout the entire Survey Area. Species composition of the surveyed trees included native California sycamores, coast live oaks, and scrub oaks, and a variety of non-native species: Aleppo pine (*Pinus halepensis)*, Canary Island pine (*Pinus canariensis),* Peruvian pepper tree, California sycamore, coast live oak, cork oak (*Quercus suber)*, *Mulberry* sp., river red gum (*Eucalyptus camaldulensis)*, Sydney blue gum (*Eucalyptus saligna)*, Tasmanian blue gum (*Eucalyptus globulus),* and sumac (*Searsia* sp.). Most of the sycamore trees and coast live oaks on the parcel are mature. Of the 183 protected trees identified in the arborist report, there were 80 California sycamores, 68 coast live oaks, seven scrub oaks, and 28 protected non-native trees. The majority of the non-native trees are protected because they are considered heritage trees (at or over 90-inch girth) under the Ventura County Protected Tree Ordinance.

iii) Nesting Bird Summary

The Migratory Bird Treaty Act protects the majority of migratory birds that breed in the US. The act states that it is illegal to take any migratory bird, nest, or eggs. “Take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or any attempt to do so. Any violation of this act is enforced by the California Department of Fish and Wildlife (CDFW). The CDFW recognizes breeding season in California as falling between February and September. While most birds do breed during this period, some species breed and nest outside of it and may occur in our study area. A medium-large passerine nest not currently in use was observed in a pepper tree. It was not identifiable at the time of the survey. Many other passerines may also nest here. For example, the American crow *(Corvus brachyrhynchos)* prefers large deciduous trees such as the California sycamore (*Platanus racemosa*) and the evergreen Peruvian peppertree that would act as an ideal nesting site. Altogether the vegetative cover, large deciduous trees, cattle fields, and coastal sage scrub habitats could all attract potential nesters. While the large trees are ideal nesting habitat for raptors, certain species may be deterred from nesting due to camp activities.

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
604	*Eucalyptus globulus*	Tasmanian Blue Gum	179.0	Not impacted
608	*Eucalyptus globulus*	Tasmanian Blue Gum	92.6	Not impacted
609	*Eucalyptus globulus*	Tasmanian Blue Gum	153.9	Not impacted
611	*Platanus racemosa*	Sycamore	17.0	Not impacted
612	*Platanus racemosa*	Sycamore	33.0	Not impacted
613	*Platanus racemosa*	Sycamore	47.4	Not impacted
614	*Platanus racemosa*	Sycamore	33.3	Not impacted
615	*Platanus racemosa*	Sycamore	18.2	Not impacted
618	*Eucalyptus globulus*	Tasmanian Blue Gum	129.7	Removal
620	*Quercus agrifolia*	Coast Live Oak	118.4	Not impacted
622	*Schinus molle*	Peruvian Pepper Tree	127.2	Not impacted
624	*Quercus berberidifolia*	Scrub Oak	17.9	Not impacted
625	*Quercus berberidifolia*	Scrub Oak	17.0	Not impacted
626	*Quercus berberidifolia*	Scrub Oak	47.1	Not impacted
628	*Quercus agrifolia*	Coast Live Oak	48.7	Not impacted
629	*Quercus agrifolia*	Coast Live Oak	18.8	Not impacted
630	*Quercus berberidifolia*	Scrub Oak	23.6	Not impacted
632	*Quercus agrifolia*	Coast Live Oak	91.7	Not impacted
633	*Quercus agrifolia*	Coast Live Oak	45.5	Not impacted
634	*Quercus agrifolia*	Coast Live Oak	90.1	Not impacted
635	*Quercus berberidifolia*	Scrub Oak	23.6	Not impacted
639	*Quercus berberidifolia*	Scrub Oak	20.4	Encroachment
641	*Schinus molle*	Peruvian Pepper Tree	161.1	Not impacted
643	*Quercus agrifolia*	Coast Live Oak	72.2	Not impacted
644	*Quercus berberidifolia*	Scrub Oak	11.0	Not impacted
645	*Quercus agrifolia*	Coast Live Oak	33.6	Encroachment
647	*Quercus agrifolia*	Coast Live Oak	18.8	Not impacted
649	*Quercus agrifolia*	Coast Live Oak	17.9	Significant Encroachment
651	*Quercus agrifolia*	Coast Live Oak	69.1	Not impacted
701	*Eucalyptus globulus*	Tasmanian Blue Gum	106.8	Not impacted
702	*Platanus racemosa*	Sycamore	40.8	Not impacted
703	*Platanus racemosa*	Sycamore	78.5	Not impacted
704	*Quercus agrifolia*	Coast Live Oak	25.1	Not impacted
705	*Eucalyptus globulus*	Tasmanian Blue Gum	94.2	Not impacted
710	*Quercus agrifolia*	Coast Live Oak	80.1	Not impacted
711	*Quercus agrifolia*	Coast Live Oak	62.8	Not impacted
712	*Eucalyptus globulus*	Tasmanian Blue Gum	171.1	Not impacted
713	*Platanus racemosa*	Sycamore	17.3	Not impacted
714	*Platanus racemosa*	Sycamore	31.4	Encroachment

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
715	*Platanus racemosa*	Sycamore	69.9	Significant Encroachment
716	*Platanus racemosa*	Sycamore	62.8	Not impacted
717	*Platanus racemosa*	Sycamore	63.6	Significant Encroachment
718	*Platanus racemosa*	Sycamore	36.1	Significant Encroachment
720	*Schinus molle*	Peruvian Pepper Tree	133.5	Not impacted
721	*Eucalyptus saligna*	Sydney Blue Gum	200.2	Not impacted
722	*Platanus racemosa*	Sycamore	56.5	Not impacted
723	*Platanus racemosa*	Sycamore	87.9	Not impacted
724	*Platanus racemosa*	Sycamore	58.1	Not impacted
725	*Platanus racemosa*	Sycamore	64.4	Not impacted
726	*Eucalyptus saligna*	Sydney Blue Gum	118.5	Not impacted
727	*Platanus racemosa*	Sycamore	14.1	Not impacted
728	*Platanus racemosa*	Sycamore	17.3	Not impacted
729	*Eucalyptus camaldulensis*	River Red Gum	109.9	Not impacted
746	*Quercus agrifolia*	Coast Live Oak	252.8	Significant Encroachment
763	*Eucalyptus saligna*	Sydney Blue Gum	168.8	Not impacted
766	*Pinus halepensis*	Aleppo Pine	95.0	Not impacted
775	*Quercus agrifolia*	Coast Live Oak	31.4	Removal
787	*Quercus agrifolia*	Coast Live Oak	40.8	Removal
789	*Schinus molle*	Peruvian Pepper Tree	94.2	Removal
798	*Platanus racemosa*	Sycamore	17.3	Not impacted
800	*Platanus racemosa*	Sycamore	69.1	Not impacted
805	*Platanus racemosa*	Sycamore	54.2	Not impacted
806	*Platanus racemosa*	Sycamore	91.1	Not impacted
807	*Quercus agrifolia*	Coast Live Oak	27.5	Not impacted
808	*Platanus racemosa*	Sycamore	239.4	Not impacted
809	*Platanus racemosa*	Sycamore	116.2	Not impacted
810	*Platanus racemosa*	Sycamore	56.5	Not impacted
811	*Platanus racemosa*	Sycamore	100.5	Not impacted
812	*Platanus racemosa*	Sycamore	17.3	Not impacted
813	*Platanus racemosa*	Sycamore	15.7	Not impacted
814	*Platanus racemosa*	Sycamore	17.3	Not impacted
815	*Platanus racemosa*	Sycamore	16.5	Not impacted
816	*Platanus racemosa*	Sycamore	21.2	Not impacted
817	*Platanus racemosa*	Sycamore	20.4	Not impacted
818	*Platanus racemosa*	Sycamore	15.7	Not impacted
819	*Platanus racemosa*	Sycamore	20.4	Not impacted

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
820	*Platanus racemosa*	Sycamore	13.4	Removal
821	*Platanus racemosa*	Sycamore	19.6	Not impacted
822	*Platanus racemosa*	Sycamore	15.7	Not impacted
823	*Platanus racemosa*	Sycamore	18.1	Not impacted
824	*Platanus racemosa*	Sycamore	18.1	Not impacted
825	*Platanus racemosa*	Sycamore	26.7	Not impacted
826	*Platanus racemosa*	Sycamore	21.2	Not impacted
827	*Platanus racemosa*	Sycamore	19.6	Not impacted
828	*Platanus racemosa*	Sycamore	21.2	Not impacted
829	*Platanus racemosa*	Sycamore	18.8	Not impacted
830	*Quercus agrifolia*	Coast Live Oak	109.9	Not impacted
831	*Quercus agrifolia*	Coast Live Oak	188.4	Not impacted
832	*Quercus agrifolia*	Coast Live Oak	82.4	Not impacted
833	*Quercus agrifolia*	Coast Live Oak	7.9	Not impacted
834	*Quercus agrifolia*	Coast Live Oak	14.1	Not impacted
835	*Platanus racemosa*	Sycamore	82.4	Not impacted
837	*Platanus racemosa*	Sycamore	36.1	Not impacted
838	*Platanus racemosa*	Sycamore	29.8	Not impacted
839	*Platanus racemosa*	Sycamore	44.0	Not impacted
839	*Platanus racemosa*	Sycamore	293.6	Not impacted
840	*Platanus racemosa*	Sycamore	30.6	Not impacted
841	*Platanus racemosa*	Sycamore	24.3	Not impacted
842	*Platanus racemosa*	Sycamore	101.3	Not impacted
843	*Platanus racemosa*	Sycamore	102.8	Not impacted
844	*Quercus agrifolia*	Coast Live Oak	23.6	Not impacted
845	*Quercus agrifolia*	Coast Live Oak	182.1	Encroachment
846	*Quercus agrifolia*	Coast Live Oak	301.4	Encroachment
847	*Quercus agrifolia*	Coast Live Oak	51.0	Removal
848	*Quercus agrifolia*	Coast Live Oak	15.7	Removal
849	*Quercus agrifolia*	Coast Live Oak	60.5	Removal
850	*Quercus agrifolia*	Coast Live Oak	50.2	Not impacted
851	*Quercus agrifolia*	Coast Live Oak	125.6	Encroachment
852	*Quercus agrifolia*	Coast Live Oak	108.3	Not impacted
856	*Schinus molle*	Peruvian Pepper Tree	98.9	Removal
857	*Platanus racemosa*	Sycamore	57.3	Not impacted
858	*Platanus racemosa*	Sycamore	72.2	Encroachment
859	*Platanus racemosa*	Sycamore	42.4	Significant Encroachment
860	*Platanus racemosa*	Sycamore	61.2	Significant Encroachment

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
861	*Platanus racemosa*	Sycamore	208.8	Encroachment
862	*Platanus racemosa*	Sycamore	41.6	Not impacted
863	*Platanus racemosa*	Sycamore	139.7	Encroachment
864	*Platanus racemosa*	Sycamore	214.3	Encroachment
865	*Quercus agrifolia*	Coast Live Oak	120.9	Encroachment
870	*Platanus racemosa*	Sycamore	61.2	Not impacted
871	*Platanus racemosa*	Sycamore	63.6	Not impacted
872	*Platanus racemosa*	Sycamore	65.9	Not impacted
873	*Platanus racemosa*	Sycamore	73.8	Not impacted
876	*Quercus agrifolia*	Coast Live Oak	95.0	Not impacted
877	*Platanus racemosa*	Sycamore	102.8	Not impacted
878	*Quercus agrifolia*	Coast Live Oak	50.2	Not impacted
880	*Quercus agrifolia*	Coast Live Oak	94.2	Not impacted
882	*Schinus molle*	Peruvian Pepper Tree	122.5	Significant Encroachment
887	*Morus sp.*	Mulberry	193.1	Not impacted
888	*Platanus racemosa*	Sycamore	80.1	Significant Encroachment
889	*Platanus racemosa*	Sycamore	80.1	Significant Encroachment
890	*Platanus racemosa*	Sycamore	72.2	Encroachment
891	*Platanus racemosa*	Sycamore	106.8	Encroachment
892	*Platanus racemosa*	Sycamore	65.9	Encroachment
894	*Platanus racemosa*	Sycamore	24.3	Encroachment
895	*Platanus racemosa*	Sycamore	16.5	Significant Encroachment
896	*Platanus racemosa*	Sycamore	9.4	Not impacted
897	*Platanus racemosa*	Sycamore	80.1	Not impacted
898	*Platanus racemosa*	Sycamore	92.6	Not impacted
902	*Platanus racemosa*	Sycamore	97.3	Not impacted
903	*Quercus agrifolia*	Coast Live Oak	34.5	Not impacted
904	*Platanus racemosa*	Sycamore	16.5	Not impacted
905	*Platanus racemosa*	Sycamore	89.5	Not impacted
907	*Quercus agrifolia*	Coast Live Oak	106.8	Encroachment
909	*Quercus agrifolia*	Coast Live Oak	44.0	Not impacted
910	*Quercus agrifolia*	Coast Live Oak	113.8	Not impacted
911	*Quercus agrifolia*	Coast Live Oak	86.4	Not impacted
912	*Quercus agrifolia*	Coast Live Oak	59.7	Encroachment
913	*Quercus agrifolia*	Coast Live Oak	42.4	Encroachment
915	*Quercus agrifolia*	Coast Live Oak	114.6	Not impacted
916	*Quercus agrifolia*	Coast Live Oak	68.3	Not impacted

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
917	*Quercus agrifolia*	Coast Live Oak	193.1	Not impacted
918	*Quercus agrifolia*	Coast Live Oak	122.5	Encroachment
919	*Schinus molle*	Peruvian Pepper Tree	205.7	Encroachment
921	*Schinus molle*	Peruvian Pepper Tree	167.2	Significant Encroachment
922	*Quercus agrifolia*	Coast Live Oak	9.4	Significant Encroachment
923	*Quercus agrifolia*	Coast Live Oak	32.2	Significant Encroachment
931	*Schinus molle*	Peruvian Pepper Tree	117.8	Not impacted
932	*Quercus agrifolia*	Coast Live Oak	28.3	Not impacted
934	*Quercus agrifolia*	Coast Live Oak	22.8	Significant Encroachment
936	*Quercus agrifolia*	Coast Live Oak	18.1	Significant Encroachment
937	*Quercus agrifolia*	Coast Live Oak	18.8	Significant Encroachment
940	*Schinus molle*	Peruvian Pepper Tree	102.1	Not impacted
943	*Schinus molle*	Peruvian Pepper Tree	141.3	Encroachment
945	*Schinus molle*	Peruvian Pepper Tree	135.0	Encroachment
946	*Quercus agrifolia*	Coast Live Oak	11.0	Not impacted
949	*Quercus agrifolia*	Coast Live Oak	40.8	Not impacted
950	*Quercus agrifolia*	Coast Live Oak	45.5	Not impacted
951	*Quercus agrifolia*	Coast Live Oak	135.8	Not impacted
952	*Quercus agrifolia*	Coast Live Oak	84.8	Not impacted
953	*Quercus agrifolia*	Coast Live Oak	10.2	Not impacted
954	*Quercus agrifolia*	Coast Live Oak	76.2	Not impacted
955	*Quercus agrifolia*	Coast Live Oak	84.0	Not impacted
956	*Quercus agrifolia*	Coast Live Oak	77.7	Not impacted
959	*Quercus suber*	Cork Oak	27.5	Significant Encroachment
963	*Quercus agrifolia*	Coast Live Oak	23.6	Encroachment
969	*Quercus agrifolia*	Coast Live Oak	15.7	Removal
971	*Quercus agrifolia*	Coast Live Oak	12.6	Not impacted
973	*Quercus agrifolia*	Coast Live Oak	9.4	Removal
974	*Quercus agrifolia*	Coast Live Oak	26.7	Removal
975	*Quercus agrifolia*	Coast Live Oak	29.8	Not impacted
985	*Schinus molle*	Peruvian Pepper Tree	179.0	Significant Encroachment
999	*Schinus molle*	Peruvian Pepper Tree	180.6	Not impacted

Table IV.E-5
Protected Trees

Protected Trees				
Map Key (1)	**Species (2)**	**Common name**	**Girth (3) (inches)**	**Impact (4)[a]**
** From Stantec Tree Protection Plan (August 30, 2022): Encroachment = Less than 20% of TPZ impacted: Significant Encroachment = More than 20% impacted*				
Source: Wildscape Restoration, 2023. Refer to Appendix C-1 of this Draft EIR.				

iv) Special-status Species Summary

A. Catalina Mariposa Lily

One special-status plant was observed, the Catalina mariposa lily (*Calochortus catalinae*). Pursuant to the initial ISBA survey conducted on February 16, 2022, additional botanical surveys (dated April 13, May 10, and July 13, 2022) were conducted to check for special-status species that are known to appear and bloom later in the year. During the April survey, 74 specimens of Catalina mariposa lily were found growing in three patches at the southwestern corner of the Project Construction Footprint of the proposed cabin development. The majority of the plants were flowering and were highly visible and identifiable at that time. During the May survey, only two specimens were still blooming, and the rest had gone to seed. In July, few dried specimens were detectable. The approximate borders of three patches were mapped and are included in Figure IV.E-2. None of the patches occur within the Development Footprint for grading and building, but the patches overlap with the Fuel Modification Zone for the cabins.

As discussed previously, the VCFD has required an expanded Fuel Modification Zone of 200 feet, which is addressed in the ISBA Supplement included in Appendix C-4 of this Draft EIR). As discussed therein, based on the updated boundary of the Fuel Modification Zone, the Catalina mariposa lilies would now be fully within the Fuel Modification Zone for the cabins. Specifically, the patches are within Fuel Modification Zone 3, which is a thinning zone.

No other special status plants or Ventura County Locally Important plant species were observed during the initial ISBA or subsequent botanical surveys. A variety of special status plants observed in the greater surrounding area are unlikely to occur within the Project Site because of its low elevation and lack of chaparral vegetation.

B. Monarch Butterfly

Monarch butterflies (*Danaus plexippus*) may be resident species or overwintering migratory populations within the Project vicinity. The overwintering populations are classified as a special-

status species. Individual monarch butterflies were detected in the proposed cabin development area and native narrow leaf milkweed (*Asclepias fascicularis*) was also found growing in the area. As monarchs lay their eggs almost exclusively on milkweed plants of the *Asclepias* genus and milkweed are critical food sources for caterpillars and adults, the milkweed growing in the cabin area may provide breeding and foraging habitat. It is difficult to determine whether individual monarchs observed at the Project Site belong to the resident population of monarchs, which breed year-round in southern California, or the migratory population (*Danaus plexippus plexippus*), which breed throughout the western states and Canada during the spring and summer and aggregate in clusters at sites along the Pacific Coast from Central California to Mexico during the winter. Due to drastic declines observed at overwintering sites, the migratory population of monarchs has been listed by the IUCN as Endangered and is ranked as Vulnerable to Imperiled at the State Level (S2S3) by NatureServe. This population was determined by USFWS to warrant listing under the Endangered Species Act, an action that is precluded by higher priority listings at this time.

The large number of *Eucalyptus* spp. on site, in addition to other mature trees including sycamores and oaks, could provide roosting habitat for overwintering individuals in the migratory population of western monarchs. However, most overwintering sites in southern California are located within 1.5 miles of the Pacific Ocean at lower elevations of 200 – 300 ft. and comprise a specific microclimate of patchy sunlight, high humidity, freshwater, and lack of freezing temperatures and high winds. Based on these overwintering habitat requirements, the Project Site is unlikely to support overwintering clusters of the migratory monarch subspecies. The monarchs observed at the Project Site are more likely members of resident population and/or migrants passing through, potentially feeding and breeding at milkweed on site.

C. Cooper's Hawk

A Cooper's hawk (*Accipiter cooperi*) was observed flying over the Survey Area on April 13, 2022. Breeding Cooper's hawks are on the CDFW Watch List and tracked in the CNDDB, but the species is not otherwise listed or identified as a species of conservation concern.

v) Additional Potentially Occurring Species

Though not observed during the initial ISBA survey and subsequent surveys conducted in the spring and summer, additional special-status species may potentially occur at the Project Site. The variety of trees and grassland and woodland communities on-site may provide stopover foraging and roosting habitat for migratory bird species. Grasshopper sparrow (*Ammodramus savannarum*) and Loggerhead shrike (*Lanius ludovicianus*) both classified as CDFW Species of Special Concern when nesting, may use the cattle pastures and other grassland communities for foraging, but are unlikely to breed on the site due to insufficient nesting habitat.

D. Crotch's Bumble Bee

Though not observed during any of the ISBA surveys, Crotch's bumble bee is considered to have a high potential of occurrence at the Project Site. Multiple plant communities within the Project Construction Footprint constitute grassland and shrubland habitats, which Crotch's bumble bees typically inhabit. Preferred food plant species, including milkweeds, lupines (*Lupinus* spp.), sages (*Salvia* spp.), clarkias (*Clarkia* spp.), and buckwheats (*Eriogonum* spp.), were observed growing throughout these communities. Furthermore, an abundance of potential nesting habitat, including small mammal burrows, brush piles, perennial bunch grasses, thatched biomass of annual grasses, bird nests, and large downed woody debris, was also observed throughout the Project Site. Five occurrences of Crotch's bumble bee have been recorded within five miles of the Project Site since 2020.

E. Special Status Reptiles

Although no special status reptile species were observed during the ISBA surveys, three CDFW Species of Special Concern have a high potential of occurrence within or adjacent to the Project Site: coastal whiptails (*Aspidoscelis tigris stejnegeri*), California legless lizards *(Anniella* spp.), and coast horned lizards (*Phrynosoma blainvillii*). All three species occur in a variety of habitats and require loose soils to some extent for foraging and/or burrowing including scrub, woodland, and streamside plant communities. California legless lizards must live where they can reach moist soil and are commonly found in the loose soil near the bases of slopes and near permanent or temporary streams. At the Project Site, legless lizards are most likely to occur along East Tributary Meier Canyon. Coastal whiptails and coast horned lizards may also occur in the riparian zone along East Tributary Meier Canyon but are also expected in other scrub and woodland communities within the Survey Area. Multiple observations of all three special status reptile species have been documented within five miles of the Project Site within the past five years.

F. Bats

Several species of bats occur within Ventura County, including seven species on the CNDDB Special Animal List observed within the Santa Susana quadrangle and surrounding eight quadrangles (see table below). Qualified bat specialists from Endemic Environmental, LLC. conducted a daytime habitat assessment for bats on March 12, 2024, and documented potential roosting bat habitat and foraging areas at the Project Site (included in Appendix C-6 of this Draft EIR). Suitable roosting habitats at the site include tree cavities, lifted bark on trees, and other exterior areas of trees, as well as hinges and crevices on buildings and other human-made structures. Potential foraging areas included the East Tributary Meier Canyon streambed and the open field of primarily Black Mustard-Ripgut Brome where the new Cabin Village is proposed. No bats were observed during the daytime habitat assessment, however, bat specialists determined that species with the greatest potential to occur at the site included western yellow bat (*Lasiurus xanthinus*), big brown bat (*Eptesicus fuscus*), Mexican free-tailed bat (*Tadarida brasiliensis*),

Yuma myotis (*Myotis yumanensis*), pallid bat (*Antrozous pallidus*) and western pipistrelle (*Parastrellus hesperus*).

In Tables IV.E-5 and IV.E-6, each species was given a "Map Key (1)" that is associated with the vegetation communities map (refer to Figure IV.E-2). If the entire site is suitable habitat for the species, it was labeled as "All zones."

3. Impact Analysis

a) Thresholds of Significance

The analysis of biological resources impacts considers criteria identified in the CEQA Guidelines Appendix G Environmental Checklist for Biological Resources and uses the following significance thresholds from the County's Initial Study Assessment Guidelines (ISAG).

i) ISAGs

A. Special-Status Species

The following types of impacts to plant and animal species or their habitats are considered potentially significant:

- Loss of one or more individuals, or the occupied habitat or USFS-designated Critical Habitat for, a species listed as Endangered, Threatened or Rare under the FESA or CESA, a species under review as a candidate for listing under FESA or CESA, or a California Fully Protected Species listed in the California Fish and Game Code.
- Elimination or potential to eliminate one or more element occurrences of a special-status species not otherwise listed under the federal Endangered Species Act or California Endangered Species Act, or as a Candidate Species or California Fully Protected Species.
- Impacts that would threaten the viability of a habitat that sustains a population of a special-status wildlife species.
- Impacts that would restrict the reproductive capacity of a special-status species.
- Take of birds protected under the California Fish and Game Code and the Federal Migratory Bird Treaty Act.
- Increases in noise and/or nighttime lighting to a level above ambient levels that would adversely affect a special-status species.
- Increases in human access, predation or competition from domestic animals, pests or exotic species, or other indirect impacts, to levels that would adversely affect special-status species.
- Impacts severe enough to substantially reduce the habitat of a wildlife species or cause a wildlife population to decline substantially or drop below self-sustaining levels, pursuant to Section 15065 of the CEQA Guidelines, Mandatory Findings of Significance.

A. Sensitive Plant Communities

The following types of impacts on sensitive plant communities are considered potentially significant:

- Construction, grading, clearing, or other activities that would temporarily or permanently remove sensitive plant communities. Temporary impacts to sensitive plant communities would be considered significant unless the sensitive plant community is restored once the temporary impact is complete. Indirect impacts resulting from Project operation at levels that would degrade the health of a sensitive plant community.

B. Waters and Wetlands

The following types of impacts on waters and wetlands are considered potentially significant:

- Any of the following activities that would adversely affect waters and wetlands: removal of vegetation, grading, obstruction or diversion of water flow, change in velocity, siltation, volume of flow, or runoff rate, placement of fill, placement of structures, construction of a road crossing, placement of culverts or other underground piping, and/or any disturbance of the substratum.
- Disruptions to wetland or riparian plant communities that would isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation.
- Interference with ongoing maintenance of hydrological conditions in a water or wetland.
- Inadequate buffer for protecting the functions and values of existing waters or wetlands. Ventura County General Plan Policy 1.5.2-4 requires a minimum buffer of 100 feet from significant wetland habitat.

C. Habitat Connectivity

A project would impact habitat connectivity if it would: (a) remove habitat within a wildlife movement corridor; (b) isolate habitat; (c) construct or create barriers that impede fish and/or wildlife movement, migration, or long-term connectivity; or (d) intimidate fish or wildlife via the introduction of noise, light, development or increased human presence. The following types of impacts on habitat connectivity are considered potentially significant:

- A habitat connectivity feature (e.g., a linkage, corridor, chokepoint, or steppingstone) would be severed, substantially interfered with, or potentially blocked.
- Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction would be prevented or substantially interfered with.
- Wildlife would be forced to use routes that endanger their survival.
- Lighting, noise, domestic animals, or other indirect impacts that could hinder or discourage fish and/or wildlife movement within habitat connectivity feature (e.g., a linkage, corridor, chokepoint, or steppingstone) would be introduced.

- The width of linkage, corridor, or chokepoint would be reduced to less than the sufficient width for movement of the target species (the species relying upon the connectivity feature). The adequacy of the width shall be based on the biological information for the target species; the quality of the habitat within and adjacent to the linkage, corridor, or chokepoint; topography; and adjacent land uses.
- For wildlife relying on visual cues for movement, elimination of visual cues that provide visual continuity (i.e., lines-of-sight) across highly constrained wildlife corridors, such as highway crossing structures or steppingstones.

ii) Appendix G of the CEQA Guidelines

A project could have a significant impact if the project would:

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

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

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

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

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

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

b) Project-Specific Impacts

Impact BIO-1a: The Project could directly impact the Catalina Mariposa Lily, which is a special status plant species. However, with implementation of Mitigation Measures MM-BIO-1 through MM-BIO-3, Project impacts on the Catalina Mariposa Lily would be less than significant.

Special Status Plant Species

Catalina Mariposa Lily

One special status plant was observed. The Catalina mariposa lily (*Calochortus catalinae*) was observed outside of the Development Footprint but within the Fuel Modification Zone for the proposed cabin area. The Catalina mariposa lily is not listed under the Federal or State Endangered Species Acts but has a California Native Plant Rank of 4.2, meaning it is of limited distribution and fairly threatened in California. A review of the Calflora database indicates a few recent observations of small populations (fewer than 100 individuals) of this species in the Santa Susana Mountains and Simi Hills bordering Simi Valley, and sporadic larger populations of a few thousand individuals observed further south and west. During spring surveys, 74 individual lily plants were observed growing in three small patches at the southwestern corner of the Project Construction Footprint (which includes the Fuel Modification Zone) of the proposed cabin development. The observed plants occurred approximately 50 feet outside of the grading footprint and fully within the Fuel Modification Zone for the cabins. In addition, increased foot traffic of campers to and from the new cabins could result in impacts to plants beyond the Fuel Modification Zone.

The Catalina mariposa lily is threatened by development throughout its range, including the Simi Valley and the surrounding foothills. Loss of the population observed at the Project Site could contribute to local extirpation of the species. Thus, Project impacts on Catalina mariposa lilies could be significant.

Mitigation Measures

The following mitigation measures are required for Project impacts on the California Mariposa Lily, which is a special status plant species:

MM-BIO-1 Catalina Mariposa Lily (*Calochortus catalinae*) Protection Plan

Purpose: To avoid potentially significant impacts to the California Mariposa Lily, which is a special-status plant species.

Requirement: A County-approved biologist shall conduct spring botanical surveys (March-May) prior to the start of ground-disturbing activities to map the extent of above-ground plants within the Project Construction Footprint to confirm the extent of the population and flag the areas for

protective fencing. The Catalina mariposa lilies exist entirely within the expanded Fuel Modification Zone. Therefore, based on the overlap of Project activities, the biologist shall create a Protection Plan to prevent Project impacts on the lilies. If impacts cannot be avoided, a restoration plan to mitigate Project impacts shall be required. The Protection Plan shall include the installation of temporary construction exclusionary protective fencing around the observed extent of aboveground lilies plus a buffer of five feet, or as otherwise appropriate as determined by the biologist, of additional potential suitable habitat. Permanent wildlife permeable fencing shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabin development, as well as short-term impacts of construction activities. Permanent fencing or barriers shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabins.

To minimize impacts of required brush clearance activities, the Protection Plan shall include retaining patches of Catalina mariposa lilies within a fuel mosaic zone to the maximum extent practicable while complying with applicable fire protection standards for fuel modification (refer to Mitigation Measure MM-BIO-3 [Fuel Modification Plan]). A long-term maintenance and management protocol shall also be established.

Documentation: A Protection Plan prepared by a County-approved biologist.

Timing: The qualified biologist shall survey for California Mariposa Lily in the spring (March-May) prior to the initiation of ground-disturbing activities to re-confirm the extent of the population and flag the areas for protective fencing.

The Protection Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys shall occur 3 to 7 days before clearing, grubbing, and grading activities occur.

Monitoring and Reporting: The biologist shall conduct spring surveys and record locations of specimens. Site monitoring during subsequent springs shall be necessary to determine progress of any on-site mitigation areas.

The Permittee shall submit the Protection Plan to the Planning Division for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Protection Plan provided by the Permittee in the Project file.

MM-BIO-2 Catalina Mariposa Lily (*Calochortus catalinae*) Restoration Plan

Purpose: To avoid potentially significant impacts to the California Mariposa Lily, which is a special status plant species.

Requirement: If permanent impacts on the Catalina mariposa lily population cannot be avoided, a Special Status Plant Species Restoration Plan shall be required. The Restoration Plan shall be

prepared by a County-approved biologist and shall include the following components: location of mitigation site; methods for site preparation and transplanting plants; and maintenance procedures related to pest control, fencing, supplemental seeding, erosion control, access control, and supplemental irrigation. The plan shall include compensation for the loss of individual plants and associated habitat through on-site mitigation and or participation in a mitigation bank. The plan shall include the required mitigation ratios, to be no less than 1:1; quantitative success criteria; and a monitoring and reporting schedule. The plan shall also include an adaptive management program and contingency measures for mitigation success if transplanting and/or propagating Catalina mariposa lilies on-site proves difficult and ultimately unsuccessful.

Documentation: A Restoration Plan prepared by a County-approved biologist.

Timing: The qualified biologist shall survey for California Mariposa Lily in the spring (March-May) prior to the initiation of ground-disturbing activities to re-confirm the extent of the population.

The Restoration Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys and any necessary relocation of plants or bulbs shall occur 3 to 7 days before clearing, grubbing, and grading activities occur.

Monitoring and Reporting: The biologist shall conduct spring surveys and record locations of specimens. A biological monitor shall be present when plants or bulbs are transplanted and shall map where they are relocated. Site monitoring during subsequent springs shall be necessary to determine progress of any on-site mitigation areas.

The Permittee shall submit the Restoration Plan to the Planning Division for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Restoration Plan provided by the Permittee in the Project file.

MM-BIO-3 Fuel Modification Plan

Purpose: To minimize potential impacts of vegetation trimming and clearing on special-status species or communities occurring within the Fuel Modification Zones.

Requirement: The Permittee shall use a County-approved qualified biologist or licensed landscape architect to prepare a Fuel Modification Plan for County Planning review and approval that minimizes impacts to special-status plants, animals, and/or communities and meets the Ventura County Fire Protection District's requirements to modify fuels surrounding structures. The Fuel Modification Plan shall specify the methods of modifying vegetation surrounding structures that will avoid impacts to special-status plants, animals, and/or communities (e.g., use of hand tools to prune vegetation, thinning shrubs rather than clear-cutting, avoiding rare plants, avoiding nesting birds). The Fuel Modification Plan shall include the establishment of fuel mosaic zones, where patches of Catalina mariposa lilies, native milkweed, and other important native plant

species can be left undisturbed during routine vegetation maintenance activities and brush clearance events.

Documentation: A Fuel Modification Plan prepared by a County-approved biologist.

Timing: The Fuel Modification Plan shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the Fuel Modification Plan to the Planning Division and the Ventura County Fire Protection District for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Fuel Modification Plan provided by the Permittee in the Project file.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-1 through MM-BIO-3 would reduce Project impacts on the Catalina Mariposa Lily, which is a special-status species, to less than significant.

Impact BIO-1b: The Project could directly and indirectly impact the Monarch butterfly, which is a special-status species. However, with implementation of Mitigation Measures MM-BIO-4 through MM-BIO-6, Project impacts on the Monarch butterfly would be less than significant.

Special-Status Wildlife

Monarch Butterfly

Monarch butterflies observed at the Project Site may be individuals of the special status migratory population of western monarchs (*Danaus pleixppus plexippus*) that winter along the California Coast and disperse to breed throughout the western United States and Canada. The Project Site comprises a large number of mature Eucalyptus trees, as well as oaks and sycamores, which could provide roosting substrate for overwintering aggregations of monarchs. However, most overwintering sites in southern California are located within 1.5 miles of the Pacific Ocean at lower elevations of 200 to 300 feet and comprise a specific microclimate of patchy sunlight, high humidity, freshwater, and lack of freezing temperatures and high winds. Based on these overwintering habitat requirements, the Project Site is unlikely to support overwintering clusters of the migratory monarch subspecies. The monarchs observed at the Project Site are more likely members of resident population and/or migrants passing through, potentially feeding and breeding at milkweed on site. Current development plans include removal of 67 surveyed trees, 12 of which are protected under the County's Tree Protection Ordinance (including one Tasmanian blue gum (*Eucalyptus globulus*) tree (#618, refer to Figure IV.E-4)), Grading and development for the cabin development would impact approximately 3.29 acres of the disturbed annual grassland community (PC01) where native milkweed and other nectar-bearing plants were

observed. Thus, the Project may result in the loss of potential foraging, breeding, and roosting habitat for migratory monarch butterflies.

Overwintering populations of monarch butterflies have declined by nearly 90 percent over the last 10 years and continue to be threatened by habitat loss and fragmentation. Therefore, habitat loss due to Project activities could result in a significant impact

Mitigation Measures

MM-BIO-4 Monarch Butterfly Habitat Assessment, Protocol Surveys, and Take Avoidance

Purpose: To avoid and/or minimize direct and indirect impacts to Monarch butterfly.

Requirement: A County-approved biologist shall conduct a habitat assessment prior to issuance of a grading permit, and no earlier than 30 days prior to initiating ground disturbance, to determine if Project areas contain habitat suitable to support monarchs. If suitable habitat is present, the qualified biologist shall assess the presence of monarchs by conducting protocol surveys consistent with USFWS recommendations. If monarchs are documented using Project areas for foraging, roosting, and/or breeding, then in the fall/winter prior to the start of construction, a County-approved qualified biologist must survey all suitable habitat, including native milkweed plants, within 1,000 feet of the Project Construction Footprint, with the first occurring during the first half of overwintering season (October – March) and the second in second half of the season. If the results of the surveys are negative for butterflies, the Project may proceed, and the biological monitor shall continue to monitor suitable habitat during the overwintering season for aggregations of roosting butterflies. If portions of the Project Construction Footprint are found to serve as an aggregation or roosting site for monarch butterflies, then a 100-foot no activity buffer shall be placed around these areas. No work shall be conducted within the buffer unless authorized by the County and only with the presence of a County-approved qualified biologist to monitor the populations. If winter roost trees are cited for removal due to safety or mortality concerns, they shall only be removed in coordination with and approval from the County.

If overwintering populations are present within the Project Construction Footprint, then at the end of each overwintering season (approximately March) a report shall be prepared by the County-approved qualified biologist and submitted by the Permittee to the County detailing the monitoring activities to serve as compliance with this measure.

Documentation: A County-approved biologist shall prepare a letter documenting the results of the survey(s), including a map depicting locations of the suitable habitat, including milkweed plants, and individuals observed.

Timing: The letter documenting the results of the survey(s) shall be submitted to the Planning Division prior to the issuance of a grading permit.

Monitoring and Reporting: If Monarch butterflies are documented using Project areas for foraging, roosting, and/or breeding, the Permittee will consult CDFW and USFWS for recommended avoidance measures prior to the start of ground disturbing activities.

MM-BIO-5 Native Milkweed Planting

Purpose: To offset potential loss of monarch foraging and breeding habitat.

Requirement: During the monarch habitat assessment described in Mitigation Measure MM-BIO-4, a qualified biologist shall map and flag native milkweed plants (*Asclepias* spp.) that are likely to be removed or damaged during Project activities. Mitigation Measure MM-BIO-3 (Fuel Modification Plan) includes recommendations to leave milkweed plants undisturbed in fuel mosaic zones during vegetation maintenance activities. Where avoidance is infeasible, removed milkweed plants shall be replaced on a 1:1 basis either through transplantation of the removed plants or through installation of native milkweed container plants. Any milkweed shall be locally native, preferably the same species as those removed from the Project Site and shall be planted in similar habitat as where it was found to occur.

Documentation: The qualified biologist shall prepare a brief letter documenting the locations of removed milkweed plants and locations of transplantations and/or installed container plants.

Timing: Identification of milkweed to be removed shall occur within 30 days of Project Implementation. Suitable locations for transplants and/or container plant installations shall be identified prior to milkweed removal and acquisition of container plants.

Monitoring and Reporting: The qualified biologist shall monitor the health and survival of transplanted and/or installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary.

MM-BIO-6 Prohibition on Non-Native Milkweed

Purpose: To offset potential loss of monarch foraging and breeding habitat.

Requirement: No non-native milkweed or plants treated with chemical pesticides shall be installed as replacement for removed plants, nor used in any new landscaping within the Project area. To the extent feasible, landscaping within and adjacent to the Project area shall incorporate native, pesticide-free milkweed and other nectar-bearing native plants.

Documentation: A letter prepared by a County-approved biologist documenting the types and locations of replacement plants for removed plants, and a landscape plan prepared by a licensed landscape architect with respect to new landscaping within the Project area.

Timing: Types and locations of replacement plants shall be identified prior to milkweed removal and acquisition of container plants. The landscape plan shall be submitted to the Planning Division prior to the issuance of a grading permit.

Monitoring and Reporting: A County-approved biologist shall monitor the health and survival of installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-4 through MM-BIO-6 would reduce Project impacts on the Monarch butterfly, which is a special-status species, to less than significant.

Impact BIO-1c: The Project could directly and indirectly impact other special-status species, such as Crotch's Bumble Bee and Bats. However, with implementation of Mitigation Measures MM-BIO-7 through MM-BIO-11, Project impacts on other special-status species would be less than significant.

Crotch's Bumble Bee

Crotch's bumble bees were not observed at the Project Site during biological assessment surveys conducted between February to July 2022, and on March 12, 2024. However, the species is considered to have a high potential for occurrence within the Survey Area. The Project Construction Footprint overlaps grassland and shubland habitats that may be suitable for Crotch's bumble bee. Preferred food plant species, including milkweeds, lupines (*Lupinus* spp.), sages (*Salvia* spp.), clarkias (*Clarkia* spp.), and buckwheats (*Eriogonum* spp.), were observed growing throughout these communities. Furthermore, an abundance of potential nesting habitat, including small mammal burrows, brush piles, perennial bunch grasses, thatched biomass of annual grasses, bird nests, and large downed woody debris, was also observed throughout the Project Site. Five occurrences of Crotch's bumble bee have been recorded within five miles of the Project Site since 2020.

Initial vegetation removal, grading, and other soil disturbing activities throughout the Project Site could result in direct injury or mortality of Crotch's bumble bee if nesting or overwintering sites are disturbed. Grading and development for the proposed cabins would impact approximately 3.29 acres of the disturbed annual grassland community (PC01) where native milkweed and other nectar-bearing plants were observed. Thus, the Project may result in the loss of potential foraging and nesting habitat for Crotch's bumble bee.

Research indicates that the Crotch's bumble bee has experienced severe declines in relative abundance and persistence within the last decade, and the species appears to be absent from most of its historic range. Habitat loss, due to agricultural intensification, livestock grazing, urban development, fire, and fire suppression, is a primary threat to the species. Additionally, factors such as competition with honeybees, disease, pesticide use, and climate change affect the ability of Crotch's bumble bees to survive and reproduce. Therefore, Project impacts on the Crotch's bumble bee could be significant

Bats

A daytime habitat assessment for bats conducted on March 12, 2024, documented potential roosting bat habitat and foraging areas at the Project Site. Suitable roosting habitats at the site include tree cavities, lifted bark on trees, and other exterior areas of trees, as well as hinges and crevices on buildings and other human-made structures. Potential foraging areas included the East Tributary Meier Canyon streambed and the open field of primarily Black Mustard-Ripgut Brome where the new cabins are proposed. No bats were observed during the daytime habitat assessment, however, bat specialists determined that species with the greatest potential to occur at the site included western yellow bat (*Lasiurus xanthinus*), big brown bat (*Eptesicus fuscus*), Mexican free-tailed bat (*Tadarida brasiliensis*), Yuma myotis (*Myotis yumanensis*), pallid bat (*Antrozous pallidus*) and western pipistrelle (*Parastrellus hesperus*).

Project activities, especially those involving the demolition of existing buildings and/or removal of mature trees, could result in direct injury or mortality of bats and a loss of roosting habitat. Therefore, Project impacts on bats could be significant.

Mitigation Measures

MM-BIO-7 Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance

Purpose: To identify suitable habitat where Project activities are most likely to impact Crotch's bumble bees and avoid direct impacts to individuals.

Requirement: A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting protocol surveys consistent with the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.

Documentation: The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitat, and any individuals or nests observed. The report shall be submitted to the County and CDFW prior to initiation of ground-disturbing activities.

Timing: The habitat assessment survey and any required protocol surveys for presence shall be conducted within one year prior to the start of ground-disturbing activities, and each year that Project activities will occur. Survey results shall be submitted to CDFW prior to the initiation of ground disturbing Project activities.

Monitoring and Reporting: If Crotch's bumble bees are documented using Project areas for foraging, nesting, and/or overwintering, or presence of the species is assumed based on the presence of suitable habitat, Project proponent will consult CDFW for recommended avoidance measures prior to the start of ground disturbing activities.

MM-BIO-8 Nighttime Bat Surveys

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: A qualified bat specialist, approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45˚F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously.

Documentation: The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.

Timing: Nighttime surveys shall be timed to allow species identification and the development of an appropriate BAPP prior to the commencement of Project activities.

Exclusion approaches for foliage-roosting bats potentially impacted by Project activities should begin within 2 months before the start of ground-disturbing activities and/or tree limbing or removal.

Monitoring and Reporting: The County shall review the BAPP (formally required in MM-BIO-10) and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-9 Acoustic Bat Surveys

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats.

Documentation: The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP).

Timing: Passive acoustic recorder surveys should be timed to allow species identification and the development of an appropriate BAPP prior to the commencement of Project activities. For example, where species may be impacted by loud equipment and vibrations, an exclusion plan must be considered and implemented at least 9 months before the start of work and maintained through the completion of construction.

Exclusion approaches for foliage-roosting bats potentially impacted by Project activities should begin within 2 months before the start of ground-disturbing activities and/or tree limbing or removal.

Monitoring and Reporting: The County shall review the BAPP (formally required in MM-BIO-10) and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-10 Bat Avoidance and Protection Plan

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)
- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal
- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site
- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats
- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat
- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

Documentation: Preparation of the BAPP by a County-approved biologist.

Timing: The BAPP shall be submitted to the Planning Division prior to the issuance of a grading permit. The measures identified in the BAPP shall be implemented in accordance with the timeframes identified in the BAPP.

Monitoring and Reporting: The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-11 Minimization of Night Lighting for Bat Habitat

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: Contractors shall minimize construction night lighting on adjacent habitats. Exterior lighting within the Project Construction Footprint adjacent to bat habitat shall be the lowest illumination allowed for human safety and security and shall be selectively placed, shielded, and directed downward to the extent possible.

Documentation: If lighting is proposed during the construction phase, the Permittee shall submit a construction-phase lighting plan identifying the type of fixtures, lighting output, direction, shielding, and timing of operation for review and approval by the Planning Director.

Timing: The lighting plan shall be submitted to the Planning Division prior to the issuance of a grading permit or building permit.

Monitoring and Reporting: The County shall review the lighting plan to ensure that all exterior lighting adjacent to any bat habitat is installed and operated according to the construction-phase lighting plan.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-7 through MM-BIO-11 would reduce Project impacts on other special-status species, such as Crotch's Bumble Bee and Bats, to less than significant.

Impact BIO-1d: The Project could directly and indirectly impact nesting birds. However, with implementation of Mitigation Measure MM-BIO-12, Project impacts on nesting birds would be less than significant.

Nesting Birds

Nesting birds protected under State and Federal law may be impacted by the development if construction takes place during the typical nesting season of February through September. The proposed project could directly affect nesting birds and their nests through the removal of trees and by conducting construction activities nearby to trees that potentially have nests. Therefore, Project impacts on nesting birds could be significant.

MM-BIO-12 Nesting Bird Avoidance, Survey, and Protection Plan

Purpose: To prevent impacts to birds protected under the Migratory Bird Treaty Act.

Requirement: The Permittee shall conduct all demolition, tree removal/trimming, vegetation clearing, and grading activities (collectively, "land clearing activities"), and construction in such a

way as to avoid nesting native birds. This can be accomplished by implementing one of the following options:

a. Timing of land clearing or construction: Prohibit land clearing or construction activities during the breeding and nesting season (February 1 – September 15, in which case the following surveys are not required; or

b. Surveys and avoidance of occupied nests: Conduct site-specific surveys prior to land clearing or construction activities during the breeding and nesting season (February 1 – September 15) and avoid occupied bird nests. A County-approved qualified biologist shall conduct surveys to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest.

The County-approved qualified biologist shall conduct an initial breeding and nesting bird survey 30 days prior to the initiation of land clearing or construction activities. The County-approved qualified biologist shall continue to survey the Project Construction Footprint on a weekly basis, with the last survey completed no more than 3 days prior to the initiation of land clearing activities. The nesting bird survey must cover the development footprint and 300 feet from the Project Construction Footprint. If occupied (active) nests are found, land clearing activities within a setback area surrounding the nest shall be postponed or halted. Land clearing activities may commence in the setback area when the nest is vacated (juveniles have fledged) provided that there is no evidence of a second attempt at nesting, as determined by the County-approved qualified biologist. Land clearing activities can also occur outside of the setback areas. Pursuant to the recommendations of the California Department of Fish and Wildlife, the required setback is 300 feet for most birds and 500 feet for raptors. This setback can be increased or decreased based on the recommendation of the County-approved qualified biologist and approval from the Planning Division.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved qualified biologist documenting the results of the initial nesting bird survey and a plan for continued surveys and avoidance of nests in accordance with the requirements set forth in this condition (above). Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys, monitoring of any occupied nests discovered, and establishment of mandatory setback areas. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved qualified biologist following land clearing activities documenting actions taken to avoid nesting birds and results.

Timing: If land clearing or construction activities will occur between February 1 – September 15, the County-approved qualified biologist shall conduct the nesting bird surveys 30 days prior to initiation of land clearing or construction activities, and weekly thereafter. The last survey for nesting birds shall be conducted no more than 3 days prior to initiation of land clearing or construction activities. The Permittee shall submit the Survey Report documenting the results of

the first nesting bird survey and the signed contract to the Planning Division prior to issuance of a zoning clearance for construction. The Permittee shall submit the Mitigation Monitoring Report within 14 days of completion of the land clearing or construction activities.

Monitoring and Reporting: The Planning Division shall review the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the Project file.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-BIO-12 would reduce Project impacts on nesting birds to less than significant.

Impact BIO-1e: The Project could directly and indirectly impact special status reptile species. However, with implementation of Mitigation Measure MM-BIO-13, Project impacts on special status reptile species would be less than significant.

Special Status Reptile Species

Three CDFW Species of Special Concern have a high potential of occurrence within or adjacent to the Project Site: coastal whiptails (*Aspidoscelis tigris stejnegeri*), California legless lizards *(Anniella* spp.), and coast horned lizards (*Phrynosoma blainvillii*). At the Project Site, legless lizards are most likely to occur along East Tributary Meier Canyon. Coastal whiptails and coast horned lizards may also occur in the riparian zone along East Tributary Meier Canyon but are also expected in other scrub and woodland communities within the Survey Area. If present, these terrestrial reptiles could suffer adverse impacts from the Project through direct injury or mortality during vegetation removal, ground disturbance, and other construction related activities. Therefore, Project impacts related to special status reptile species could be significant

MM-BIO-13 Special Status Reptile Avoidance, Protection, and Relocation Plan

Purpose: To avoid impacts to coastal whiptail, coast horned lizard, and California legless lizards that may occur within and adjacent to the Construction Footprint.

Requirement: A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard. At a minimum, the relocation plan shall include the following elements:

- Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts

- Habitat and conditions of proposed relocation sites in nearby, undisturbed areas
- Protocols for trapping and relocating individuals of each species
- Protocols for documenting and reporting the number of individuals/species relocated

If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a 1:1 ratio shall be required. Compensatory mitigation may include on and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Documentation: The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.

Timing: During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site.

A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day.

Monitoring and Reporting: The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the progress of the site towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-BIO-13 would reduce Project impacts on special status reptile species to less than significant.

Impact BIO-1f: The Project could directly and indirectly impact other special status wildlife. However, with implementation of Mitigation Measures MM-BIO-14 through BIO-17, Project impacts on special status reptile species would be less than significant.

Other Special-status Species with a High Occurrence of Potential

Other special status wildlife species were determined to have a moderate to high potential for occurrence within the Project Site (see Table IV.E-3). These species were not observed during the biological assessment surveys conducted in 2022 and 2024, but a lack of detection does not preclude their presence. If present, special status wildlife could suffer adverse impacts from the Project through direct injury or mortality during vegetation removal, ground disturbance, and other construction-related activities, and/or the loss of foraging and breeding habitat. Therefore, Project impacts related to other special status wildlife could be significant.

Noise

Increases in noise have the potential to impact special-status species. However, while the Project would include an increase in the number of special events and the number of attendees at certain events, special events already occur in the existing facilities at the Project Site. As discussed in greater detail in Section IV.L, Noise, of this Draft EIR, the use of any amplified sounds would be marginally louder than background noise levels and any human conversation and increasing the frequency or number of attendees at such events would not significantly increase noise levels. Therefore, Project noise would not be expected to impact any special-status species at the Project Site.

Mitigation Measures

MM-BIO-14 Pre-Construction Survey and Site Clearance

Purpose: To protect any special status plant or wildlife species occurring within or moving through the Construction Footprint through avoidance and relocation.

Requirement: A County-approved qualified biologist shall conduct a pre-construction survey one to three days before any clearing, grubbing, or grading activities occur for areas of temporary and permanent disturbance associated with the Project Construction Footprint. Grading activities shall occur no more than 3 days after site clearance occurs. If grading is discontinued for a period of more than 3 days, additional pre-construction surveys shall be required prior to restarting work. Areas containing special-status species or habitat for special-status species, shall be staked and flagged off as “No Entry/No Construction” areas to be avoided until construction is completed. If special status plants cannot be avoided, they shall be transplanted and/or replaced according to Mitigation Measure MM-BIO-17 (Special-status species Avoidance and Protection Plan). If special status animals are observed during the pre-construction survey and cannot be avoided, they shall be humanely moved off-site by a qualified (and permitted, as necessary) biologist and

subsequently excluded from the project impact area following Mitigation Measure MM-BIO-17 (Special-status species Avoidance and Protection Plan). If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action.

Documentation: The qualified biologist shall prepare a report documenting the pre-construction survey results and site clearance activities. The original and final locations of any wildlife or plant relocations shall be recorded and mapped.

Timing: The Project proponent shall ensure that pre-construction survey(s) are completed within three days prior to the start of ground-disturbing activities.

Monitoring and Reporting: The qualified biologist shall submit a pre-construction survey report to the County and CDFW and/or USFWS, as required by any regulatory permits.

MM-BIO-15 Biological Monitoring

Purpose: To protect any special status plant or wildlife species occurring within or moving through the Construction Footprint through avoidance and relocation.

Requirement: A County-approved qualified biologist shall be present each day during construction phase ground-disturbing activities, including vegetation removal, grubbing, and grading to the first 24 inches of soil depth, and at least weekly during other construction activities to ensure that biological avoidance and minimization measures are implemented. If special status wildlife species are observed within the work area, work shall be halted until the animal leaves the area of its own volition or is hand-captured and relocated to suitable habitat outside of the work area by a qualified biologist. If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action.

Documentation: The biological monitor shall prepare daily field notes of monitoring activities, which shall be summarized in a final monitoring report when construction activities have been completed at a particular site. The date and original and final locations of any wildlife relocations shall be recorded and mapped.

Timing: Monitoring shall be conducted daily during initial ground-disturbing activities and on a weekly basis during all other construction activities unless greater frequency is required in a protection plan developed for special-status species, bats, or nesting birds. Daily / weekly monitoring reports shall be sent to the Planning Division.

Monitoring and Reporting: The Project proponent shall ensure that biological monitoring occurs as required by this mitigation measure, or as stipulated for the protection of special-status species,

bats, and/or nesting birds, whichever is most frequent. The biological monitor shall submit daily / weekly monitoring reports and a final monitoring report to the County. The County shall provide the final monitoring report to CDFW and/or USFWS, as required by any regulatory permits.

MM-BIO-16 Focused Surveys for Special Status Wildlife

Purpose: To determine the presence or absence of special status wildlife species within the Construction Footprint.

Requirement: Where reconnaissance-level biological surveys indicate that areas within the Project Construction Footprint encroach upon potentially suitable habitat for special-status species, a County-approved qualified biologist shall conduct focused surveys for the potentially occurring species, utilizing agency-recommended survey protocols for applicable species. The timing of surveys may be species-specific. If the presence of a special-status species is documented within the Project impact area, the Project proponent shall consult with the appropriate agency or agencies (CDFW and/or USFWS) for recommended take avoidance measures and additional permitting requirements and prepare a Special-status species Avoidance and Protection plan (refer to Mitigation Measure BMM-IO-17 [Special-status species Avoidance and Protection Plan]). While focused and protocol surveys following the CDFW and/or USFWS protocols are considered most effective for detecting the target species, they may fail to detect individuals. The Project proponent may choose to assume presence of certain species based on the presence of high-quality habitat in lieu of, or in addition to, presence/absence surveys.

Documentation: The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitats and individuals observed.

Timing: Protocol-level surveys and resulting agency consultations shall occur prior to the approval and/or the issuance of a grading permit for Project activities.

Monitoring and Reporting: The qualified biologist shall report the results of any protocol surveys to the County and appropriate regulatory agencies, following all applicable protocol standards.

MM-BIO-17 Special-status Species Avoidance and Protection Plan

Purpose: To protect any special-status species occurring within or moving through the Construction Footprint.

Requirement: If focused surveys indicate the presence of a special-status species, a County-approved qualified biologist shall notify the appropriate regulatory agencies (CDFW and/or USFWS) and prepare a Special-status species Avoidance and Protection Plan. Depending on the site and project specifications, the plan may include the following elements:

- Timing considerations for temporal avoidance.

- Required pre-construction surveys and construction monitoring.
- Humane relocation and exclusion methods to remove and/or exclude wildlife from the Project Site.
- Translocation plan and procedures for special status plants.
- Protective fencing to avoid impacts to plants or wildlife habitat that shall remain on site.
- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations during construction.
- On and/or off-site mitigation measures to compensate for lost or disturbed habitat.
- Required post-mitigation monitoring.

Documentation: The qualified biologist shall prepare the Special-status species Avoidance and Protection Plan, as described above, and submit it to the County and the appropriate regulatory agencies (CDFW and/or USFWS).

Timing: The Special-status species Avoidance and Protection Plan shall be submitted to and approved by the County and appropriate regulatory agencies (CDFW and/or USFWS) prior to the issuance of a grading permit.

Monitoring and Reporting: The County shall review the Special-status species Avoidance and Protection Plan and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of project activities, as required.

MM-BIO-18 Contractor Education

Purpose: To help Project personnel identify and avoid impacts to special-status species and other sensitive natural resources during construction activities.

Requirement: Before conducting construction activities, all Project personnel shall participate in an educational training session conducted by a qualified biologist. The education training shall include information about relevant special-status species, their habitat, identification, conservation, and appropriate protocol if they are observed during construction. The training session shall be repeated for any new personnel joining the Project before they begin construction activities.

Documentation: The qualified biologist shall provide a copy of the contractor education brochure to all Project personnel and the County for their review. The biologist shall also keep a list of Project personnel who have completed the training and submit it to the County at the completion of construction.

Timing: The qualified biologist shall conduct contractor education for Project personnel prior to the start of any ground-disturbing activities and repeat the training, as needed, for any new Project personnel before they begin construction activities.

Monitoring and Reporting: The Planning Division shall review the copy of the contractor education brochure as well as the list of Project personnel who have completed the training and shall maintain such documents in the Project file.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-14 through MM-BIO-18 would reduce Project impacts on other special-status species to less than significant. In addition, implementation of these measures would ensure that a take of any special-status species would not foreseeably occur as a result of the Project.

Impact BIO-2: **The Project would not result in any significant impacts on sensitive plant communities. However, the Project could directly and indirectly impact protected trees and would therefore be required to implement mitigation related to removal of protected trees. Therefore, with implementation of Mitigation Measures MM-BIO-22 and MM-BIO-23, impacts would be less than significant.**

Two of the plant communities identified within the Survey Area are designated by CDFW as Rare. The California Sycamore-Coast Live Oak South Coast Woodland/Forest Association (PC04) and Coast Live Oak-Scrub Oak Woodland/Forest Association (PC 06) are both classified as G3S3, vulnerable to extirpation or extinction at the global and state levels. Within the Project Survey Area, both communities are highly disturbed. The sycamore-oak woodland (PC04) occurs along a frequently used dirt road and parking area. Understory vegetation is sparse and consists of primarily non-native herbaceous species. Approximately 0.06 acres of PC04 occurs within the Development Footprint or Area Disturbed of the Welcome Center/Parking Area, while an additional 1.35 acres falls within the Fuel Modification Zone. Design plans do not call for the removal of any of the protected sycamores (girth of 9.5 inches or greater) from this sensitive community,[3] and measures required for their protection shall be implemented according to the County Protected Tree Ordinance (outlined in Mitigation Measures MM-BIO-21 and MM-BIO-22 below).

The coast live oak-scrub oak woodland (PC06) occurs in the western portion of the Project area between the proposed cabin development and existing housing and ornamental landscaping. The oaks may have been planted as part of the landscape installations. Approximately 0.39 acres of this plant community falls within the Project Construction Footprint of the proposed cabin area, but as designed, most of the natural vegetation and protected trees of this community would

[3] One 13.4-inch girth sycamore is proposed for removal but is part of the PC12 (Urban or Built-Up Land) community, not PC04 or PC06.

remain as part of the landscaping. Thus, impacts to PC06 are primarily related to required fuel modification activities.

The current landscape and grading plans prevent the removal of approximately 0.18 acres of Coast Live Oak-Scrub Oak Woodland/Forest (PC 06) natural vegetation within the proposed cabin development area. Incorporation of this natural vegetation into the overall landscape design of the development reduces Project impacts on sensitive plant communities at the site. Therefore, Project impacts on sensitive plant communities would be less than significant.

Mitigation Measures

The Project would implement Mitigation Measures MM-BIO-22 and MM-BIO-23, provided further below, related to the removal of protected trees.

Level of Significance After Mitigation

With implementation of Mitigation Measures MM-BIO-22 and MM-BIO-23, Project impacts related to sensitive plant communities would be less than significant.

Impact BIO-3: The Project could directly and indirectly impact wetlands. However, with implementation of Mitigation Measures MM-BIO-19 and MM-BIO-20, Project impacts on wetlands would be less than significant.

While no Project activities are planned to occur within the banks and active floodplain of the ephemeral stream running through the southern portion of the site (East Tributary Meier Canyon, W1), the Project may result in significant impacts to streambed habitat if not properly mitigated. Within the Project survey area, there are approximately 3.85 acres of streambed and contiguous California Sycamore – Coast Live Oak South Coast Woodland that may fall within CDFW jurisdiction. The Development Footprint overlaps approximately 0.06 acres of the delineated CDFW jurisdictional area, as some construction activities and landscaping may encroach upon mature California sycamores. An additional 1.35 acres of the jurisdictional area falls within the 200-foot fuel modification zone required for the proposed Welcome Center. A 0.26-acre portion of this riparian habitat also falls under the jurisdiction of the US Army Corps of Engineers (USACE). Thus, alterations to the habitat within the Project Construction Footprint (including the Development Footprint Fuel Modification Zone) may constitute a permanent impact to 1.41 acres of CDFW jurisdictional streambed. During an initial consultation for the Project, a CDFW representative recommended that a formal Notification of Streambed Alteration be submitted to CDFW for review.

Potential impacts to the streambed habitat include encroachment upon riparian California sycamores and potential stormwater impacts related to the increase in impervious surfaces. To mitigate stormwater impacts, the Project design includes the installation of two bypass culverts to collect, redirect, and moderate flows of run-off water from upstream areas of the watershed above the proposed cabin development. The Project design includes several measures identified in the

Ventura County Technical Guidance Manual for Stormwater Quality Measures (TGM) to reduce the Effective Impervious Area of the proposed development. Rainwater harvesting (RWH-1 in the TGM) via barrels adjacent to each cabin would be implemented to capture runoff in the western portion of the Project Site. In the area of the proposed Welcome Center and parking lot, a combination of vegetated swales (BIO-3) and vegetated filter strips (BIO-4), a volume-based bioretention with underdrain (BIO-1), and permeable pavers (INF-5) would be used to reduce the Effective Impervious Area of the Project Site and comply with stormwater quality standards. In addition to these measures, best management practices (BMPs) would be implemented to prevent any run-off or fill from entering the stream during construction (see Mitigation Measure MM-BIO-20). The combination of Project design measures and BMPs would ensure that the Project does not impact run-off quantity or quality, and that the Project would not result in an increase in sedimentation or the introduction of hazardous materials or waste into a water or wetland. Therefore, the Project would not interfere substantially with hydrological conditions in a water and/or wetland.

As discussed above (Impacts to Sensitive Plant Communities) the sycamore-oak woodland (PC04), which constitutes the riparian habitat along the ephemeral stream, is already highly disturbed. Approximately 0.06 acres of this habitat occur within the Development Footprint of the Welcome Center/Parking Area, while an additional 1.35 acres fall within the Fuel Modification Zone. Design plans do not call for the removal of any of the protected sycamores (girth of 9.5 inches or greater) from this sensitive community[4] and measures required for their protection would be implemented according to the County Protected Tree Ordinance (refer to Mitigation Measures MM-BIO-22 and MM-BIO-23).

In accordance with the Ventura County 2040 General Plan Implementation Policy, compensatory mitigation is required to offset the impact of ground-disturbing construction activities within 0.06 acres of the riparian zone of East Tributary Meier Canyon. On-site restoration and enhancement of portions of the riparian zone adjacent to the area of impact at a 1:1 mitigation ratio is required (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]). Additional compensatory mitigation may not be required, but would be at the discretion of CDFW, for the 1.35 acres of riparian habitat that falls within the Project Fuel Modification Zone due to the highly disturbed condition and current management of this area. Intact riparian vegetation along the stream is sparse and the area borders a dirt road, parking area, and small play area. The understory of the mature California sycamores in the riparian zone bordering the proposed Welcome Center and Parking area has already been impacted by landscaping and fuel modification activities. Any additional impacts of required fuel modification for the new development within this area are expected to be less than significant.

After review of the Project through the formal Notification process, CDFW may recommend or require additional measures to mitigate potential impacts to the streambed and adjacent habitat. If these measures include compensatory mitigation for impacts related to ground-disturbing

[4] One 13.4-inch girth sycamore is proposed for removal but is part of the PC12 (Urban or Built-Up Land) community, not PC04 or PC06.

construction activities within 0.06 acres of the riparian zone of East Tributary Meier Canyon and fuel modification within 1.35 acres of the riparian zone, mitigation at the ratio set by CDFW shall be included in a Habitat Restoration and/or Replacement Plan (refer to Mitigation Measure MM-BIO-18).

In terms of a wetland buffer, while the proposed Welcome Center building is setback approximately 100 – 136 feet from the East Tributary Meier Canyon bank, much of the proposed parking lot falls within 100 feet of the stream and a portion of the lot approaches within approximately 10 feet of the bank. When the stream border is expanded to include mature sycamores growing landward of the banks as potential indicators of riparian habitat, there is direct overlap with the Project Construction Footprint.

The current edge of the bank sustains a drivable dirt road, and the area is already used for parking and frequented by the cattle ranchers and campers. Therefore, a 25 – 50-foot buffer from the bank is recommended. Given the current level of disturbance and activity in the proposed Welcome Center area and paucity of riparian vegetation in the understory of the California-Sycamore-Coast Live Oak Southern Woodland, an additional setback from the dripline of mature sycamores does not seem necessary. As planned, the Welcome Center and Parking Area will not require removal of any California sycamores or coast live oaks growing adjacent to the stream and a Tree Protection Plan (formally provided as Mitigation Measure MM-BIO-22) will include measures to preserve the life and health of trees that construction activities encroach upon. Protection of the California sycamores and Stormwater Pollution Prevention measures described above and in Mitigation Measure MM-BIO-20 make the Project compatible with preservation of the limited riparian habitat that exists. A large buffer from the edge of the sycamore dripline would preclude development within a disturbed area that already includes buildings, drivable dirt roads, and parking. Therefore, the analysis contained in the Revised Initial Study Biological Assessment (included in Appendix C-3 of this Draft EIR) concluded that the proposed wetland buffer would be adequate.

Mitigation Measures

The following mitigation measures are required for Project impacts on wetlands:

MM-BIO-19 Development and Implementation of a Habitat Restoration and/or Replacement Plan

Purpose: To offset the loss of riparian habitat, and other native plant communities, due to development and fuel modification within the riparian zone of East Tributary Meier Canyon. In addition, the Fuel Modification Zone will potentially impact the California Sagebrush Shrubland Alliance and Purple Sage Shrubland Alliance due to brush clearance for fuel modification.

Requirement: The Project proponent shall provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of riparian habitat results from the development. The restoration and/or replacement habitat shall be “in kind” (i.e., same type and

acreage) and provide habitat of comparable biological value. On-site restoration and enhancement of riparian habitat adjacent to the impacted area is recommended at a 1:1 ratio, or higher ratio if required by CDFW. The Project proponent shall develop a 5-year Habitat Restoration and/or Replacement Plan in consultation with all agencies that have jurisdiction over the resource. Components of the Plan shall include but are not limited to the locations and acreages of compensatory mitigation sites, habitat restoration and enhancement activities, mitigation success criteria, and a monitoring schedule.

Documentation: The Permittee shall submit a Habitat Restoration and/or Replacement Plan prepared by a qualified biologist.

Timing: The Habitat Restoration and/or Replacement Plan should be submitted to and approved by the County and any other agencies with jurisdiction over the resource prior to issuance of a grading permit.

Monitoring and Reporting: Monitoring of the mitigation site shall be conducted at least annually for five years following initial mitigation implementation to track progress of the site towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource.

MM-BIO-20 Best Management Practices

Purpose: To avoid significant impacts to plant and wildlife species during construction, Best Management Practices (BMPs) shall be employed.

Requirement: During construction, the Permittee shall adhere to the following BMPs:

a. All food items and associated refuse shall be placed in covered containers that preclude access or use by wildlife.

b. No dogs or other potentially predatory domesticated animals shall be allowed on the Project Site unless on a leash or otherwise contained at all times.

c. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area.

d. Feeding of wildlife by any employee or contractor of the Permittee shall be prohibited.

e. Temporary signage on the Project Site to inform personnel and visitors of the above requirements.

f. A County-approved qualified biologist shall confirm and photo-document the installation of the temporary signage.

Documentation: The Permittee shall prepare photo documentation of the complete installation of the signage and implementation of the above BMPs.

Timing: Prior to the issuance of a Zoning Clearance for construction (i.e. grading or land clearing activities), the Permittee must take the following actions: 1) install signage; and 2) submit photo documentation of the signage to the Planning Division.

Monitoring and Reporting: The Planning Division maintains copies of the signed photo-documentation in the Project file and has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-19 and MM-BIO-20 would reduce the Project impacts on wetlands to less than significant.

Impact BIO-4: The Project could directly and indirectly impact wildlife connectivity. However, with implementation of Mitigation Measure MM-BIO-21, Project impacts on wildlife connectivity would be less than significant.

While various wildlife species move throughout Camp Alonim, existing development, human activity, and the proximity of the Camp to a dense urban area (Simi Valley) make the Project Site less suitable for long-range movements between natural habitat areas. As described previously, there are three distinct connectivity features within the Survey Area: 1) the drainage located to the west of the proposed cabin development; 2) the oak woodland habitat south of the existing cabins; and 3) the East Tributary Meier Canyon streambed running to south of the proposed Welcome Center and parking lot. As discussed in the Revised Initial Study Biological Assessment (included in Appendix C-3 of this Draft EIR), none of the identified connectivity features within the Survey Area would be obstructed by new development. The Project Construction Footprint of the cabin development does not overlap the depression drainage adjacent to the proposed development. The Welcome Center and proposed parking development also would not block any of the identified connectivity features used by wildlife. The ephemeral stream would remain intact and can provide passage for wildlife. In addition, wildlife could continue using the bridges to cross East Tributary Meier Canyon when it is flowing.

While the new development is unlikely to physically obstruct wildlife movement in a substantial way, increased human activity, noise, and artificial lighting in development areas could impact natural wildlife movements through and adjacent to the Project Site. With regard to noise, while the Project would include an increase in the number of special events and the number of attendees at certain events, special events already occur in the existing facilities at the Project Site. As discussed in greater detail in Section IV.L, Noise, of this Draft EIR, the use of any amplified sounds would be marginally louder than background noise levels and any human conversation and increasing the frequency or number of attendees at such events would not significantly

increase noise levels. Therefore, Project noise would not impact wildlife movement through the Project Site.

The proposed improvements at Camp Alonim would include the introduction of new artificial light sources in and around the new cabins and in the Welcome Center / parking area. Artificial light at night can cause shifts in wildlife activity. Some species would increase or decrease activity near artificial lighting in response to perceived predation risk. Recent research indicates that mountain lions (*Puma concolor*), stealth predators relying on concealment to ambush prey, avoid areas highly polluted by artificial lighting at night. Therefore, Project impacts related to wildlife movement could be significant. To minimize the effects of artificial lighting on wildlife movements, the Project would be designed to use low impact lighting to the extent feasible, while still complying with lighting requirements for safety and security standards (see Mitigation Measure MM-BIO-21, below). In addition, restoration and enhancement of the riparian zone along East Meier Canyon would also help mitigate potential impacts to habitat connectivity by improving a vegetation cover along a corridor feature likely used by wildlife moving through the Project Site (see Mitigation Measure MM-BIO-19, provided previously).

Mitigation Measures

The following mitigation measure is required for Project impacts on wildlife movement:

MM-BIO-21 Low Impact Lighting Plan

Purpose: To ensure lighting on the subject property is provided in compliance with Section 8107-5.67 of the Ventura County Non-Coastal Zoning Ordinance.

Requirement: The Permittee shall submit two copies of a lighting plan to the Planning Division for review and approval prior to implementing such plan. The lighting plan shall comply with the following:

a. The lighting plan shall be prepared by an electrical engineer registered by the State of California.

b. The lighting plan shall include a photometric plan and manufacturer's specifications for each exterior light fixture type (e.g., light standards, bollards, and wall mounted packs). The Permittee shall also include the lighting color and maximum lumens for each light fixture.

c. The lighting plan shall provide illumination information within parking areas, pathways, streetscapes, and open spaces proposed throughout the development.

d. In order to minimize light and glare on the Project Site, all light fixtures shall be high cut-off type that divert lighting downward onto the property and shall not cast light on any adjacent property or roadway, or wildlife habitat.

e. The outdoor lighting shall maintain the maximum light trespass levels identified in Table 1 of NCZO Section 8109-4.7.4.

The Permittee shall bear the total cost of the review and approval of the lighting plan and shall install all elements of the approved lighting plan according to the approved Lighting Plan.

Documentation: The Permittee shall prepare the lighting plan.

Timing: The Permittee shall submit the lighting plan to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for construction. The Permittee shall maintain the lighting as approved in the lighting plan for the life of the permit.

Monitoring and Reporting: The Planning Division shall maintain a stamped copy of the approved lighting plan in the Project file. The Building and Safety inspector and Planning Division staff have the authority to ensure that the lighting is installed according to the approved lighting plan prior to the issuance of a Certificate of Occupancy. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-BIO-21 would reduce the Project's impact on wildlife movement to less than significant.

Impact BIO-5: The Project could directly and indirectly impact protected trees. However, with implementation of Mitigation Measures MM-BIO-22 and MM-BIO-23, Project impacts related to protected trees would be less than significant.

As initially designed, the Project would result in the removal of 67 surveyed trees, 12 of which are protected under the County of Ventura Tree Protection Ordinance. One protected California sycamore (*Platanus racemosa),* eight protected coast live oaks (*Quercus agrifolia*), and three non-native heritage trees would be removed. Project activities would encroach upon an additional 17 protected California sycamores, 17 protected coast live oaks, one scrub oak, one non-native cork oak, and six non-native heritage trees.

Based on the expanded Fuel Modification Zone to 200 feet, a total of 275 trees are now within the Project Construction Footprint. While trees in the Coast Live Oak Woodland/Forest Alliances (PC04, PC05, and PC06) are now in the Fuel Modification Zone, the VCFD generally does not require oak removal in thinning zones, but will require trimming and pruning. Therefore, Project impacts related to protected trees could be significant.

Mitigation Measures

The following mitigation measures are required for Project impacts on protected trees:

MM-BIO-22 Protected Tree Mitigation and Protection Plan

Purpose: To comply with the County's Tree Protection Regulations (TPR) set forth in Section 8107-25 et seq. of the NCZO and the *Tree Protection Guidelines* (TPG),

Requirement: The Permittee shall avoid impacting protected trees to the extent feasible and shall offset or mitigate any damage to protected trees or associated impacts from such damage. If protected trees are felled/damaged and require offsets/mitigation pursuant to the County's TPR (Section 8107-25.10) and TPG (Section IV.C, Offset/Replacement Guidelines), the Permittee shall post a financial assurance to cover the costs of planting and maintaining the offset trees. To avoid impacts to protected trees to the maximum extent feasible, the Permittee shall prepare a Tree Protection Plan.

Documentation: The TPP must include (but is not limited to):

a. locations of trees to be removed;

b. locations of trees to be encroached upon;

c. measures (such as protective fencing) to protect all TPR-protected trees whose tree protection zones (TPZs) are within 50 feet of the Project Construction Footprint (including stockpile and storage areas, access roads, and all areas to be used for construction activities) or within 10 feet of other trees proposed for felling or removal;

d. indication of which trees shall be transplanted as well as designated transplant and replacement planting locations;

e. the offset or mitigation that will be provided for any trees approved for felling; and

f. the offset or mitigation that will be provided should any protected trees be damaged unexpectedly.

A qualified arborist shall prepare the TPP in conformance with the County's TPR, TPG, and "Content Requirements for Tree Protection Plans."

If in-lieu fees will be paid to a conservation agency for tree offsets/mitigation, the Permittee shall submit to the Planning Division for review and approval, a tree mitigation plan from a conservation agency that explains how the mitigation funds will be used to support the preservation of protected trees. After the Planning Division's review and approval of the tree mitigation plan, the Permittee shall provide the Planning Division with a copy of the contract between the conservation agency and the Permittee.

If a financial assurance is required for tree offsets/mitigation, the Planning Division shall provide the Permittee with a "Financial Assurance Acknowledgement" form. The Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form to the Planning Division. The Permittee shall submit annual verification that any non-cash financial assurances are current and have not expired.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the TPP to the Planning Division for review and approval, implement all prior-to-construction tree protection measures, and submit the required documentation to demonstrate that the Permittee implemented the tree protection measures. Unless otherwise approved by the Planning Director, replacement and transplant trees must be planted prior to occupancy. Other monitoring and reporting dates shall be as indicated in the approved TPP.

If in lieu fees are required and will be paid to the Planning Division's Tree Impact Fund, the Permittee shall submit these fees prior to the issuance of a Zoning Clearance for construction. Where a TPP damaged tree addendum is prepared, the Permittee shall remit payment of the fees within 30 days of Planning Division's approval of the addendum.

If in lieu fees are required and will be paid to an approved conservation agency, the Permittee shall submit these fees, along with the required tree mitigation plan and contract from the conservation organization, prior to the issuance of a Zoning Clearance for construction.

If a financial assurance is required, the Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form prior to the issuance of a Zoning Clearance for construction. The Planning Division may release the financial assurance after receiving the report from the Project arborist that verifies that the replacement trees met their final 5- or 7-year performance targets set forth in the TPP.

Monitoring and Reporting: The Permittee shall retain an arborist to monitor and prepare the documentation regarding the health of the protected trees, pursuant to the monitoring and reporting requirements set forth in the "Content Requirements for Tree Protection Plans." The Planning Division maintains the approved TPP and all supporting documentation in the Project file. The Resource Management Agency Operations Division maintains copies of all financial documentation. Planning Division staff, Building and Safety Inspectors, and Public Works Agency grading inspectors have the authority to inspect the site during the construction phase of the Project, in order to verify that tree protection measures remain in place during construction activities, consistent with the requirements of Section 8114-3 of the NCZO.

MM-BIO-23: Tree Health Monitoring and Reporting

Purpose: To comply with the County's TPR set forth in Section 8107-25 et seq. of the NCZO and the TPG,

Requirement: The Permittee shall submit annual monitoring reports, prepared by an arborist, after initiation of construction activities and until five years after the completion of construction activities, which address the success of tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the initiation of construction activities. If any trees are found to be in serious decline (e.g., "D" status, or "C" status if pre-construction status was "A"), the arborist's report must include a Damaged Tree Addendum to the TPP which recommends offsets and any associated additional monitoring.

Documentation: The Permittee shall submit annual arborist reports as stated in the "Requirement" section of this condition (above).

Timing: The Permittee shall submit annual arborist reports after initiation of construction activities and until two years after the completion of construction activities.

Monitoring and Reporting: The Permittee shall implement any recommendations made by the arborist's Damaged Tree Addendum to the satisfaction of the Planning Director. The Planning Division maintains copies of all documentation and evidence that the arborist's recommendations are implemented. The Planning Division has the authority to inspect the site to confirm the health of the protected trees and to ensure that the recommendations made by the arborist are implemented consistent with the requirements of Section 8114-3 of the NCZO.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-BIO-22 and MM-BIO-23 would reduce the Project's impacts on protected trees to less than significant.

Impact BIO-6: **The Project Site would not result in any impacts related to location within the boundaries of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional or state habitat conservation plan, and no mitigation measures are required.**

The Project Site is not located within the boundaries of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional or state habitat conservation plan. Therefore, the Project would not result in any impacts on implementation of any such plans.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

c) Cumulative Impacts

A cumulative impact to biological resources may occur if a project has the potential to collectively degrade the quality of the environment, substantially reduce the habitat of wildlife species, or

cause a population to drop below self-sustaining levels, thereby threatening to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species. With the exception of the cases associated with the Project Site itself, none of the related projects are in close enough proximity to combine with the Project to result in impacts to biological resources. In addition, implementation of Mitigation Measures MM-BIO-1 through MM-BIO-22 would ensure that the Project would not result in any significant impacts related to biological resources. Therefore, there would be no adverse cumulative impacts to biological resources.

Mitigation Measures

Implementation of Mitigation Measures MM-BIO-1 through MM-BIO-23 would ensure that the Project would not result in any significant impacts.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.F CULTURAL RESOURCES

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. The information and analysis presented below are primarily based on the following sources, which are included as Appendices D-1, D-2, and D-3 (respectively) of this Draft EIR:

D-1 Historic Resources Report Brandeis-Bardin Campus, American Jewish University, San Buenaventura Research Associates, March 31, 2013.

D-2 Certificate of Appropriateness, Ventura County Cultural Heritage Board, September 26, 2022.

D-3 Phase I Archaeological Survey of the Camp Alonim Improvements, W&S Consultants, September 29, 2022.

1. Regulatory Setting

a) Federal

i) National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[1] The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[2]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the

[1] 36 Code of Federal Regulations (CFR) 60.

[2] United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."[3]

A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.[4]

Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

A resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the National Historic Preservation Act.

A. Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

[3] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 5.

[4] United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, page 12.

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

B. Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear."[5] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

C. Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[6] The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district as well as the historic, spatial, and visual relationships of the components. Some buildings or features may be more altered over time than others. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character defining features.

D. Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria discussed above, and possess

[5] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, pages 7 and 8.

[6] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 44.

integrity as defined above.[7] Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance.[8] The full list of Criteria Considerations is provided below.

A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B. A building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or

D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or

G. A property achieving significance within the past 50 years, if it is of exceptional importance.

ii) Secretary of the Interior's Standards

The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards provides relevant guidance for such projects.

b) State

i) California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section

[7] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 25.

[8] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 41.

21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts 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 by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.[9] If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.[10]

[9] California Public Resources Code Section 21083.1(a).

[10] State CEQA Statute and Guidelines, Section 15064.5(c)(4).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired".[11] According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) 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

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.[12]

ii) California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[13] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[14] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

[11] State CEQA Guidelines, Section 15064.5(b)(1).

[12] State CEQA Guidelines, 15064.5(b)(3).

[13] California Public Resources Code, Section 5024.1[a].

[14] California Public Resources Code, Section 5024.1[b].

2. Is associated with the lives of persons important in our past;

3. 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 values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

iii) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

iv) California Public Resources Code

California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities consider the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

c) Local

i) Ventura County Landmark Criteria

An improvement, natural feature, or site may become a designated landmark if it meets one of the following criteria:

1. It exemplifies or reflects special elements of the County's social, aesthetic, engineering, architectural or natural history.
2. It is associated with events that have made a significant contribution to the broad patterns of Ventura County or its cities, regional history, or the cultural heritage of California or the United States.
3. It is associated with the lives of persons important to Ventura County or its cities, California, or national history.
4. It has yielded, or has the potential to yield, information important to the prehistory or history of Ventura County or its cities, California or the nation.
5. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
6. Integrity: Establish the authenticity of the resource's physical identity by evidence of lack of deterioration and significant survival of the characteristics that existing during its period of importance. This shall be evaluated with regard to the retention of location, design, setting, materials, workmanship.

ii) Ventura County Site of Merit Criteria

Sites of Merit satisfy the following criteria:

1. Sites of historical, architectural, community, or aesthetic merit that have not been designated as landmarks or points of interest but that are deserving of special recognition.
2. County approved surveyed sites with a National Register status code of 5 or above.

2. Environmental Setting

a) Historical Setting

The history of Simi Valley spans thousands of years, beginning with the Chumash people, who inhabited the area as early as 10,000 to 12,000 years ago and established villages such as Ta'apu, Shimiyi, and Kimishax along key trade routes. Spanish colonization brought the establishment of missions and ranchos, with El Rancho Simi granted in 1795 to Santiago de la Cruz Pico and later sold to Don Jose de la Guerra y Noriega, who raised cattle and sheep. After U.S. acquisition, the land passed to the Philadelphia and California Petroleum Company in 1865, and later the Simi Land and Water Company, which promoted farming and settlement. In the late 1800s, Chicago investors formed the Colony of Simiopolis, marking the area's transition into an organized town. The arrival of the Southern Pacific Railroad in the early 1900s spurred growth, while agriculture remained a dominant industry. In the 20th century, Simi Valley became a hub for Hollywood productions, with Corriganville Movie Ranch and Big Sky Ranch serving as filming sites. Postwar growth was driven by North American Aircraft's Rocketdyne division, which established the Santa Susana Field Laboratory for rocket testing in the late 1940s. Ultimately, residents voted to incorporate as the City of Simi Valley in 1969, blending its Native American heritage, ranching roots, agricultural economy, and aerospace and entertainment industries into a distinctive historical legacy.

In addition to the Chumash, the Fernandeno Tataviam (Tataviam) lived in the upper drainage of the Santa Clara River between the San Fernando Valley to the south and the top of Pastoria Creek in the Tehachapi Mountains to the north. To the east, their ancestral lands extended to part of the southern fringe of Antelope Valley. The core Tataviam population centered on the south sides of the Liebre, Sawmill, and Sierra Pelona Mountains. Neighboring groups include the Ventureño Chumash to the west, Emigdiano Chumash to the north, Kitanemuk to the northeast, Vanyume Serrano to the east, and Western Gabrielino to the south in the San Fernando Valley. Archaeological data indicate broad similarities among the Tataviam and Chumash. Information about Tataviam social organization and political structure is relatively limited, but there is no evidence that would substantially differentiate them from the Kitanemuk and Western Gabrielino. Tataviam villages ranged from large centers of around 200 individuals to small settlements of 10 to 15 people. Intermediate-sized villages were dispersed between the larger centers, with smaller villages spaced around the larger villages. Considering their environment and available data, it is

probable that Tataviam relied more heavily on yucca as a staple than neighboring groups. Additional plant foods most likely included acorns, sage seeds, juniper seeds, and islay berries. Animal resources included small mammals such as rabbits and rodents, as well as deer and possibly antelope.

i) The American Jewish University's Brandeis-Bardin Campus

The Project Site, originally part of the Spanish land grant El Rancho Simi, passed through numerous owners and uses over time. After Thomas A. Scott's Philadelphia and California Petroleum Company failed as an oil venture, the land was subdivided by the Simi Land and Water Company in 1887, with the Project Site located in Parcel A, also known as Potrero del Burro. By the early 1900s, Edward R. Maier, heir to the Maier Brewing Company, assembled a large ranch that became known for cattle, horses, and lavish gatherings featuring sports, entertainment, and charitable events, and he built an extravagant twenty-room mansion on the property in 1913. However, Prohibition devastated his brewery, leading to bankruptcy and the sale of the ranch in 1947 to the Brandeis Camp Institute. The western portion was later acquired in 1960 by actor James Arness of *Gunsmoke* fame, who operated it as a working ranch with crops, cattle, and horses, while also hosting roundups and social gatherings. The property contained a main house, stables, barns, and entertainment facilities, some of which dated to the Maier era. Arness eventually donated his ranch to the Brandeis Institute in 1972, cementing its long history of evolving ownership and use.

ii) Brandeis-Bardin Institute

The Brandeis-Bardin Institute (previously known as the Brandeis Camp Institute of the West and the Brandeis Institute) was founded in 1941 by U.S. Supreme Court Justice Louis D. Brandeis and educator Dr. Shlomo Bardin as a center for perpetuation of Jewish culture and heritage. The Institute has hosted internationally renowned lecturers and provided programming for youth, adults, seniors and the developmentally disabled. It has influenced countless leaders, educators and scholars in Jewish American life and has served as a model for other ethnic groups who developed similar organizations to promote culture, advocacy and service.

When the property was acquired by the Brandeis Camp Institute, the existing buildings were adapted for the Institute's needs. Some of the Maier ranch buildings that remained on the property began to be renovated in 1948. A former camper recalled in *Brandeis-Bardin Institute: A Living History* that the boys and girls arriving for the first *Aliyah* (assent or immigration) used bathrooms set up in part of an old barn.

Many of the needed materials were donated, including carpeting, siding, light fixtures and furniture. Louis Boyer, a housing developer who served on the board, donated several buildings from one of his subdivisions to be used as staff housing and as classrooms. Harry Warner of Warner Brothers Studios donated five homes and farm equipment from the Warner Ranch in Burbank. Several individuals with ties to the entertainment industry were supporters of the Brandeis Camp Institute of the West, including Harry Maizlish who worked for Warner Brothers, writer/producer Mac Benoff, radio writer Norman Corwin, writer/producer Milton Sperling,

screenwriter/novelist Michael Blankfort, and writer/director and MGM executive Dore Schary. They advised the institute on fundraising and programming.

A swimming pool was built in 1948, and new cabins, a recreation hall and other new buildings were added for the Camp Alonim circa 1955. The need for new living quarters for guests and faculty led to designs being created and approved in 1959. By 1960, seven new multi-unit cottages were under construction.

In 1965 Sidney Eisenshtat, AIA was retained to design the House of the Book, an auditorium, library and religious center, which was to be located on top of one of the mountains that overlooked the vast property. This building was completed in 1973. A distinctive building composed of joined concrete cylinders, it was designated a Ventura County Landmark in 1979.

Numerous upgrades to the buildings and grounds were completed in the late 1970s, from electrical and plumbing improvements to new equipment for the kitchen. The activities building, however, was deemed irreparable and was slated for demolition in 1980. A new six-unit cottage adjacent to the existing housing was also added circa 1980. Due to the new commercial development on a neighboring property, half of the iconic, old pepper trees that lined the entry road were removed. A new bridge was built across the flood channel at the entrance as well. A new activities building was developed for Camp Alonim in 1984.

Brandeis-Bardin Institute (BBI) began allowing outside groups to rent the premises for their own programming, such as Rotary Club meetings and Simi Valley Police Department SWAT training. Studios and production companies were also permitted to use the location for movies and television. The sale of a 100-acre portion of the BBI property that abutted new industrial development in the City of Simi Valley was initiated in 1986 and completed in 1988.

The 1994 Northridge earthquake severely damaged the Maier ranch house, which BBI called the Main House. Along with several other damaged buildings throughout the camp, it was demolished. Designs for new re- placement buildings included plans to incorporate items salvaged from the old buildings such as stained glass, parts of a large wooden balustrade, two wood-post Light fixtures and stones from the fireplace. In 1997 construction was completed on an administration building, new housing facilities and a conference center complex including a new Main House, Library, rotunda, meeting rooms, plaza, and dining hall.

Camp Alonim was upgraded with insulation and rewiring in the Late 1990s. Two additional overnight camping sites linked by trails were created with assistance from BBI participants in 2001. New cottages designed with families with small children in mind were built and an outdoor challenge course with climbing walls and an alpine tower was installed in 2002. A wildfire in 2005 burned 1,500 acres of the institute's property and damaged the House of the Book's roof and a set of doors.

A financial evaluation of the organization led to a merger with the University of Judaism based in Los Angeles in 2007. Thereafter, the BBI property would be known as the Brandeis-Bardin Campus of the new American Jewish University (AJU). After the merger was completed, AJU provided funding for a new Alonim dining hall.

iii) Association with Edward R. Maier

El Rancho Selecto (aka Rancho Special or Las Delicias) was not the primary residence of Edward R. Maier. News stories of the period would report his return to the city after having been at his Simi Valley ranch for a period of time. His family home through at least 1916, the year of his mother Mary's death, is documented as 1605 S. Figueroa Street in Los Angeles. The following year, Edward married Kathleen Stegmaier of Pennsylvania.

They had five children together before she died in an automobile accident in Los Angeles in 1933. Their address at the time was Listed as 2421 S. Figueroa Street. By 1940 voter registration records also listed Maier at a Beverly Hills residence. Edward Maier died while trying to fight a fire at his beach cottage on Old Malibu Road, Malibu, in 1943.

iv) Association with James Arness

The buildings from the Arness ranch that presently remain on the property are the barn and the residential buildings. The main house, once a bowling alley, was built circa 1900 and converted to residential use in perhaps the 1920s. In 1965, during the time Arness owned the property, the assessor noted that the home included four bedrooms, two offices, a den, kitchen, dining and living rooms. A bunkhouse behind the main house was built in 1962. The assessor's records note that a trailer (used as a dressing room) was located near the bunk house in 1965 and a trailer still exists next to the bunkhouse today. The dance pavilion that was described as being to the northwest of the main house no longer exists; the pool has been filled in. The heater house that was located near the pool no longer exists. A building matching the heater house's size and footprint appears in aerial photography as late as 2007.

A short distance to the southeast is a home that was used as the foreman's residence during the time James Arness owned the ranch. It was built circa 1890. Assessor's records note that the home was moved, although the original location is illegible. Wendy Varble, John's widow, relays that the home was moved from a canyon on the same property, possibly by Edward Maier.

The metal-clad barn on the road to the southeast of the residences is referred to as the Arness barn or Johnny's barn, in reference to John Varble. Its construction date is listed as 1948. Another barn is located along the road between the cluster of residential buildings and Johnny's barn, on the north side of the lot line and adjacent to the dry creek. It is referred to as the Red Art Barn and is used for activities, art and storage. Its construction date in assessor records is listed as 1914, and thus, it is likely a remnant of the Maier ranch.

Two homes located slightly to the northeast of the grouping of Arness buildings, just on the north side of the lot line, were likely moved onto the property for use by the Brandeis Camp Institute. They are presently used as staff housing. One of them was identified in assessor records as being built in 1945. Another smaller building just to the north and adjacent to the dry creek is also identified in the assessor's records as having been built in 1945.

The Simi Valley ranch was not known to be the primary residence of James Arness. He owned the ranch from 1960 through 1972 but divided his time between various properties. His autobiography states that in the early 1950s he and his wife Virginia moved into a new house they

had built on Bienveneda Avenue in Pacific Palisades. Arness lived there through the 1960s. He also had another home built in San Clemente and rented a home in Hawaii for approximately fifteen years, starting from when his children were very young. Arness also purchased a parcel in Hollister Ranch (the date is unclear, either 1964 or 1971), northwest of Santa Barbara, and built a home there. One reason for keeping residences on the coast was that Arness and his son Rolf were avid surfers; at age eighteen Rolf won the 1970 World Surfing Competition in Melbourne, Australia. His father, Rolf Cirkler Aurness, seems to have been the on-site caretaker of the Simi Valley ranch when James Arness was not staying on the property. A room in the home was reserved exclusively for James Arness' use. In his later years Arness lived in Brentwood; he passed away in 2011.

b) Ethnographic and Prehistoric Setting

i) Ethnographic Background

The Simi Valley region, including the Project Site area, lies within the traditional territory of the Chumash, a Hokan-speaking people whose inland boundaries extended through the Santa Susana Mountains. Ethnographic and mission records indicate that the Chumash were a complex hunting, gathering, and fishing society with dense populations, permanent villages, and hierarchical chiefdoms, with eastern Simi Valley likely part of the Lulapin domain centered at Point Mugu. Several Chumash villages and placenames are recorded in the Simi region, including Shimiyi (the source of the name “Simi”), Ta’apu, Kimichaq, and Kasi’wey, among others, with Ta’apu noted as an unusually persistent village that retained inhabitants after missionization by the Spanish.

In addition to the Chumash, the Fernandeno Tataviam (Tataviam) lived in the upper drainage of the Santa Clara River between the San Fernando Valley to the south and the top of Pastoria Creek in the Tehachapi Mountains to the north. To the east, their ancestral lands extended to part of the southern fringe of Antelope Valley. The core Tataviam population centered on the south sides of the Liebre, Sawmill, and Sierra Pelona Mountains. Neighboring groups include the Ventureño Chumash to the west, Emigdiano Chumash to the north, Kitanemuk to the northeast, Vanyume Serrano to the east, and Western Gabrielino to the south in the San Fernando Valley.

ii) Archaeological Background

The regional prehistoric chronology of coastal southern California, first outlined by Rogers (1929) and refined by Wallace (1955) and later scholars, is generally divided into four periods. The speculative Early Man/Big Game Hunting period may date to the Late Pleistocene, though little evidence survives due to coastal geomorphic instability. By 9,000–10,000 years ago, the Early Millingstone period emerged, characterized by ground stone and cobble tools used for broad plant processing and marine resource exploitation, particularly shellfish. Around 4000–3500 years ago, the Intermediate period began, marked by expanded marine use, the introduction of hopper mortars, stone bowls, fishhooks, and increased inland settlement, suggesting population growth and environmental diversification. By A.D. 1200, the Late Prehistoric period was underway, with the adoption of the bow and arrow, new bead forms, and the rise of a complex Chumash maritime

economy supported by craft specialization and mass production of shell beads, culminating in the sociopolitical development of the Lulapin chiefdom.

c) Potential Historic Resources

The Brandeis-Bardin Campus today features over one-hundred buildings, a small number of which predate Brandeis-Bardin Campus ownership. Subsequently, many buildings were purpose-built on site, but a significant number were also moved to the property from movie studios and elsewhere, perhaps as early as the late 1940s. Documenting the moved buildings, and establishing their original dates of construction, when they were moved to the property, and from where, was outside the scope of this study. Documentary evidence appears lacking in any case.

Buildings constructed or moved to the property by Brandeis-Bardin Campus are summarized on the comprehensive table of buildings in Appendix A of the Historical Resources Report included in Appendix D-1 of this Draft EIR. This table is based upon an inventory provided by Brandeis-Bardin Campus, with columns added to note a date of construction and use data for individual buildings derived from Ventura County Assessor records. The primary method of matching buildings to assessor information was the square footage of the buildings stated in both the assessor records and the Brandeis-Bardin Campus inventory, along with the assistance of the staff at Brandeis-Bardin Campus This method provided close and likely matches, but not perfect or authoritative matches.

Childcare Center (Building #5.1). This long, rectangular plan building of box frame construction with board and batten walls features a low-pitched gable roof, overhanging eaves, exposed rafter tails, and is covered with a metal roofing material. The west elevation has a single hollow core or wood door. The east elevation has double wood doors that contain what appear to be aluminum single-hung windows. The north and south elevations are partly covered by vegetation. Several doors on the south elevation are not clearly visible. Two of them are wood with six lites above three vertical panels. Sliding glass windows, either aluminum or vinyl, on found on all elevations. Assessor's notes refer to this building as the library, with a construction date of 1914. Other than changes to some window and door openings, it appears to be unaltered.

Childcare Center (Building #5.2). This is a wood frame rectangular building with a medium-pitched gable roof, overhanging eaves, exposed rafter tails and asphalt shingles. A small addition projecting off the west elevation is covered by a shed roof. The horizontal wood siding varies from the main building and the addition. The building is elevated above grade and wood lattice covers the lower portion of the building. The west elevation has a rectangular vent with horizontal slats under the gable peak and a dropped shed roof covering the entry stoop and doors. The wood double doors each feature a single lite over two panels. Steel pipe rails are Located on each side of the steps. The addition features three-panel double doors, under which is a small shelf supported by brackets.

The south elevation has a long handicap access ramp with a wood balustrade and what appears to be a contemporary single door with ten lites. The east elevation also has a horizontal slatted vent, a dropped shed roof over an entry stoop with iron pipe railings and wooden double doors. Each door has five lites although it appears that repairs have covered some of the glass. The

north elevation seems to have the same double doors and the lower two panes on each door have been painted or covered over. Both the north and south elevations have one over one, wooden double-hung windows. A low cobblestone wall with a concrete cap provides seating around the north, east and west sides of the building. Assessor's notes refer to this building as the BCI lecture hall, with a construction date of 1950. It appears to be essentially unaltered.

Childcare Center (Building #5.3). This large, one-story building features a slight L or elbow plan. The roof is gabled and covered with corrugated metal sheets. Approximately half of the building on the northern end is not visible due to vegetation overgrowth but appears to have board and batten walls. The southern half is mostly open, supported by various wood posts. A large portion of the building at the southern end is covered by a shed roof which begins below the gable. The building is enclosed by walls again at the southwest corner. A small storage or workroom has been built in this area in the interior. Assessor's records refer to it as the BCI Rec Hall and Dance Pavilion/Canteen/Theater Building, with a construction date of 1945. It appears to be essentially unaltered.

Activities Building/Red Art Barn (Building #8.2). This building is a wood frame, gabled barn with board and batten walls. The medium-pitch roof with widely overhanging eaves and exposed rafter tails is covered with rolled asphalt. An off-center, one-story wing is connected to the west elevation, also with a medium- pitch roof with overhanging eaves and exposed rafter tails but covered with a metal roofing material. On the south elevation twelve rectangular openings evenly spaced at the first-floor level are covered with plywood sheets that function like awning windows. The north elevation has similar openings, but they were not as carefully examined because of limited access due to the slope of the creek bank.

Of the various window openings on the first and second floor, most appear to only have screen coverings. The second floor of the east elevation features a single wood door or window with eight divided lites, one of which is missing. Also on the east elevation, a separate one-story building abuts the barn wall. It is wood construction, has low walls with posts above supporting a flat roof. The upper half of the walls are covered only by screens. A concrete silo is located a short distance away to the southeast. Assessor's records refer to the building as Art Studio and Storage, built in 1914. It appears to be essentially unaltered.

Foreman's House (Building #17.3). This is a one story, wood frame building with a hipped roof covered with rolled asphalt and board and batten siding. The west elevation features a chimney and an addition covered by a flat roof. The addition is clad with wide boards and battens. The north elevation has a dropped shed roof supported by wood posts covering a six paneled wood door. The east elevation consists of a small addition and porch covered by a dropped, flat roof that is supported by wood posts, and a water heater closet. The entry door is not visible as it is covered by a steel security door. An additional door on the east elevation is located at the addition on the south end of the building. The south elevation also has a flat-roofed addition, with a breezeway of sorts in the center. The cladding varies from typical board and batten to wide boards with battens. Windows throughout the home include vinyl siding, wood double-hung, what appears to be a hopper window, and a small fixed or casement window.

Assessor's records list the construction date as 1890 and note that the home is "prefab" and moved from an- other, uncertain location. One theory offered by Wendy Varble, widow of Johnny Varble, is that it is a pre-cut, partially assembled home such as the Colony Houses that were brought to Simi Valley in the late 1800s. She also believes the home was located elsewhere on the property prior to its current location. It is somewhat altered.

Arness Residence (Building #17.4). This is a one story, rectangular, wood frame building with board and batten exterior. It has a medium-pitch, gabled roof with overhanging eaves and exposed rafter tails. It is covered in metal roofing material. On the south side of the building, where the gable roof ends, a shed roof continues along the length of the building. This portion of the building was enclosed (the assessor's records show it was originally a u-plan building). Two entry doors, both contemporary (wood with oval glass above two panels), are located on the south elevation. There appears to be another addition on the west end of the building. The exterior cladding changes to wider, plyboard-like sheets at both the enclosure and addition. The roof on the west addition is flat.

A dropped shed roof covers the entry on the east elevation. The door is not visible as it is covered by a steel security door. A small section of the north elevation projects outward. Also on this elevation is a small porch supported by wood posts and decorative geometrical wood members. A second door is topped by a dropped shed roof. The doors are not visible as they are covered by steel security doors. The home features a variety of window types including wood and vinyl sliding windows, a fixed wood window, and wood and vinyl double- hung windows. The assessor's records list its construction date as 1900 and notes that it was converted from a bowling alley to residential use in approximately the 1920s. It is substantially altered.

Bunkhouse (Building #17.5). This is a one story, rectangular building with a medium-pitch, side gabled roof with overhanging eaves and exposed rafter tails. It is covered in metal roofing material. It has board and batten exterior and vertical siding on the gable. A small addition with a shed roof is attached to the east end of the building. The north elevation has vinyl sliding windows and three contemporary wood doors; one is covered by a steel security door. The east elevation abuts the trailer on site. The south and west elevations were not evaluated. The assessor's records list its construction date as 1962. It is substantially altered.

Trailer (Building #17.6). This trailer abuts the bunkhouse. It features a large porch supported by posts on the north elevation. Also on this elevation are aluminum sliding doors, a single door and two louvered windows. A shed on the east end of the trailer is constructed of board and batten with a shed roof. The assessor's records note a trailer behind the Building #17. and near the bunkhouse. This trailer is very like the same. It appears to be an early coach, but the date of manufacture and placement on the property are both unknown.

Staff Housing (Building #17.11). This one story, wood frame, rectangular plan building features, wide, horizontal wood siding and a shed roof. The roofing material is only slightly visible and is believed to be rolled asphalt. The north elevation has a single-entry door flanked by four over four, double-hung windows. The windows are covered by screens but appear to be wood. Both windows have louvered shutters. The roof projects slightly to cover the entry stoop. The door is covered by a security screen and was not visible. The east elevation has a vinyl sliding window.

The south elevation has two vinyl sliding windows and a third window which is covered by a screen, but appears to be one over one, wood double hung. A water heater closet is attached to this elevation. The west elevation is difficult to evaluate due to plantings and its proximity to another building, but it also has four over four, double hung windows covered with screens. The assessor's records refer to it as a guest house and list its construction date as 1945.

Staff Housing (Building #17.12). This is a one story, wood frame building featuring a T-plan and wide, horizontal wood siding, and a shed roof that appears to be covered with rolled asphalt. The shed roof hangs over the north elevation protecting the stoop and entry door, which is wooden with three panels. There are also three windows on the north elevation; each is four over four wood double hung. A porch with a shed roof, supported by wood posts, also runs across approximately half of the north elevation.

The west elevation has an entry door in the portion of the building that makes the short end of the T. The door is covered by a security screen and is therefore not visible. The east elevation has two wood, one over one, double-hung windows. The south elevation has three windows. Although they are covered by screens, they appear to be wood hopper windows, one of which is covered by a small dropped shed roof. The south elevation also has a water closet and a single-entry door which is not visible because it is covered by second wood and screen door. This building is not identified in the assessor's records so an exact construction date cannot be determined. The visual evidence suggests circa 1945. The level of integrity is difficult to assess, as the existing configuration suggests more than one period of construction.

Silver Barn (Building #19). This large rectangular plan barn features a medium-pitch, front gabled roof. It is corrugated metal construction. The east and west elevations each feature a large, overhead track-hung entry door made of the same material as the building. Attached to the north elevation is a shed covered with corrugated metal and a shed roof. The north and south elevations have several windows. AJU refers to it as the Silver Barn, Arness Barn or Johnny's Barn. Its construction date is listed as 1948. It appears to be unaltered.

Guest House (Building #24.2). This is a small one-story building with an irregular footprint shaped roughly like a T. The two parts of the building comprising the T have their own shed roofs. It has wide horizontal wood siding. The north elevation was difficult to assess due to the slope of the creek bank but appears to feature a single wood door and a wood double-hung window. The east elevation has no fenestration. The south elevation has a small water heater closet, two wood double-hung windows and either a single door or a window that is obstructed from view by the water heater closet. On the west elevation the shed roof has an overhang that covers two entry stoops, each with a single door. They are covered by steel security doors but at least one door is seen to be wooden with three panels. The west elevation also has two one over one, wood, double-hung windows. The assessor's records refer to it as a guest house and list its construction date as 1945. The level of integrity is difficult to assess, as the existing configuration suggests more than one period of construction.

Print Shop (Building #24.20). This is a one story, wood frame, rectangular building featuring wide board and batten siding. It has a low-pitch gabled roof with overhanging eaves and exposed rafter tails. It is covered with metal roofing material. The north elevation has a dropped shed roof

under the gable across the width of the building and a small vent under the gable peak. There is a single door, probably of hollow core construction, and a window that is not visible due to being covered with a screen. The west elevation has two single doors, probably hollow core construction, and two windows. One of these is covered by a screen and is not visible, the other is louvered. The roofline on this elevation has been extended to cover a concrete walkway to the two entry doors. The east elevation has two windows, one of which is louvered; the other was not visible. The south elevation was not evaluated. Assessor's records refer to it as the print shop and printing room. Its construction date is listed as 1914. The building is probably substantially altered, as the siding material does not appear to be original.

Reservoir (Building #26.1). This rectangular plan, below ground water reservoir is located upslope from the administration building. The low-pitch, gabled roof that covers it appears to be made of corrugated metal. The roof is supported by posts and is just a few feet above ground. The entire structure is surrounded by a chain link fence. Its construction date is listed as 1914 in the assessor's records. It appears to be unaltered.

i) Eligibility of Historic Resources

The buildings listed above have be evaluated for their associations with the Edward Maier and James Arness periods of ownership of the property, although it should be noted that several of these buildings appear to predate their ownership.

A. National and California Registers: Significance, Eligibility and Integrity

This property is associated with the pioneer settlement of Simi Valley, and the important event of the subdivision of Rancho Simi in 1888. However, the property does not appear to be more than generally associated with this event and played no, known significant role in this event. It is also unclear if any of the extant buildings on the property date from this settlement period, which logically ends with the arrival of the Southern Pacific Railroad in the valley in 1903 (NRHP Criterion A and CRHR Criterion 1).

The property is associated with two potentially significant individuals, Los Angeles industrialist Edward Maier, and actor James Arness. Both apparently resided on the property only intermittently and did not treat it as their primary residence. Maier appears to have utilized the property most notably for the entertainment of friends and to support his charitable efforts. Maier's home on the property, which was the centerpiece of this activity, was demolished in 1994, significantly reducing his association with the property as it exists today. Similarly, Arness appears to have made only occasional use of his ranch, owning or renting other homes during this time period in Pacific Palisades, San Clemente, Hollister Ranch, and Hawaii. Consequently, it appears that neither individual was significantly associated with this property (NRHP Criterion B and CRHR Criterion 2).

None of the evaluated buildings on the property are representative examples of an architectural style, period, and type of construction (NRHP Criterion C and CRHR Criterion 3). All are at most typical examples of their styles and types, and many are altered to the extent that they do not represent styles or types.

B. Ventura County Landmark Eligibility

The evaluated buildings on this property do not appear to exemplify or reflect special elements of the County's social, aesthetic, engineering, architectural or natural history (Criterion 1), or are associated with events that have made a significant contribution to the broad patterns of history (Criterion 2). They do not appear to be associated with the lives of persons important to Ventura County or its cities, California, or national history (Criterion 3); or to embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values (Criterion 5). Therefore, the evaluated buildings would not be eligible for Ventura County Landmark designation.

C. Conclusion

The buildings evaluated in this document do not appear to be eligible for the NRHP, the CRHR or for Ventura County Landmark designation. Therefore, they are not historic resources for purposes of CEQA.

d) Potential Archaeological Resources

i) Archaeological Record Search

In order to determine both if the Project Site study area had ever been systematically surveyed by archaeologists, and whether or not prehistoric and/or historical archaeological sites were known to exist on the property, an archaeological records search of the South Central Coastal Information Center (SCCIC) site files and maps was commissioned. This record search was conducted by the AIC staff, and a copy of their records search is included as Appendix A of the Phase I Archaeological Resources Report, which is included in Appendix D-3 of this Draft EIR.

According to the maps, site records and reports on file at the SCCIC, the Project study area had not been systematically surveyed. Further, no archaeological sites had been recorded on the property and only one site (P-56-000734) had been recorded about 1/2 mile from the Project Site. This site is no longer in existence due to commercial development of the location many years ago.

Historical maps, consisting of the Calabasas 1903, 1908; 1947 (15-minute), and 1903; 1941 USGS Santa Susana (7.5-minute) topographical quadrangles, were also examined in an effort to identify historical (Euro-American) structures or features that might have existed on the property. These show no early development on the study area.

ii) Archaeological Field Survey

An intensive, Phase I archaeological field survey was conducted for the Project study area in September 2022. Field procedures involved walking transects spaced at approximately 5-to-10-meter intervals across the 20-acre study area. The ground surface was examined during these transects to identify archaeological specimens in the form of worked artifacts, or archaeological indicators, which might consist of specimens of shellfish, bone or waste lithic material resulting from the tool-making process.

Conditions for the field survey were found to be good, with adequate ground surface visibility over the majority of the property. Much of the study area had experienced surficial grading and one area of thin surficial fill was present in the northern portion of the project. Introduced grasses were present in a low to moderate density across the property. Three modern manufactured buildings were also noted in the southeastern portion of the study area. Finally, no cultural resources were observed within the study area, confirming the results of the archaeological records search for this property.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

b) Project-Specific Impacts

Impact CULT-1 **The buildings on the Project Site are not significant historical resources under CEQA, and implementation of the Project would not result in any impacts related to historical resources.**

As discussed previously under Subsection c) Potential Historical Resources, the buildings on the Project Site do not appear to be eligible for the National Register, California Register, or for Ventura County Landmark designation and are not considered significant historical resources under CEQA. In addition, the Ventura County Cultural Heritage Board (CHB) approved a Certificate of Appropriateness (COA) for the Project (included in Appendix D-2 of this Draft EIR). At a hearing on the matter, the CHB found that the Project meets the requirements of the Ventura County Cultural Heritage Ordinance Section 1371-4(b) and also determined that the Project would result in no impact with respect to historical resources. Thus, implementation of the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, no impacts related to historical resources would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant

Impact CULT-2 **No archaeological resources exist at the Project Site, and implementation of the Project would not result in any impacts related to archaeological resources.**

An intensive archaeological survey of the Project Site was conducted, including literature, maps, and records review of the prehistory, history, and status of archaeological research in the region, and an intensive on-foot survey of the site. No cultural resources of any kind were observed on the site. Thus, implementation of the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, no impacts related to archaeological resources would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact CULT-3 **No human remains are known to exist at the Project Site in the area of Project construction activities. If unknown remains happen to be discovered on the site, the Applicant would implement a mitigation measure related to human remains, which would reduce impacts to less than significant.**

As discussed in Section II, Project Description, a small cemetery with four gravesites was established on the Project Site in the 1970s. However, no structural development or other construction activities would occur within the vicinity of the cemetery. No other human remains are known to exist at the Project Site. However, should any human remains be discovered during the course of any ground disturbing activities, the Project shall comply with Mitigation Measure MM-TCR-4, provided in Section IV.P, Tribal Cultural Resources. This measure restates regulatory requirements related to the discovery of human remains, including State Health and Safety Code Section 7050.5.

Mitigation Measures

See Mitigation Measure MM-TCR-4 in Section IV.P, Tribal Cultural Resources, of this Draft EIR.

Level of Significance After Mitigation

With implementation of the identified mitigation measure, Project impacts would be less than significant.

c) Cumulative Impacts

It is possible that some of the related projects could result in significant impacts on historical resources or archaeological resources. However, as discussed in detail above, the Project would not result in impacts to any significant historical resource, nor would the Project result in a significant impact to any archaeological resources or human remains. Thus, the Project would not

have the potential to contribute toward any significant cumulative impacts related to cultural resources. In the event that archeological or human remains are uncovered on the site of any related project, each related project would be required to comply with regulatory requirements or mitigation measures to ensure the proper treatment of such resources. Therefore, as the Project's impacts would be less than significant, Project impacts to cultural resources would not be cumulatively considerable. As such, cumulative impacts would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

IV.G ENERGY

This section analyzes impacts on energy resources due to construction and operation of the Project. Section 15126.2 (b) of the California Environmental Quality Act (CEQA) Guidelines states that a project's energy use shall be analyzed to determine the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, as well as being compliant with building codes and renewable energy features. Energy calculations presented in this section for the Project are based on the following source, which is included as Appendix I of this Draft EIR:

I Energy Calculations, CAJA Environmental Services, LLC, September 2025.

1. Regulatory Setting

a) Federal

i) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for (1) technological feasibility, (2) economic practicality, (3) effect of other standards on fuel economy, and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 mpg. Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by the USEPA and the NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[1] The USEPA and the NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5- to 25-percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[2]

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by the USEPA and the NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline,

[1] United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.

[2] United States Environmental Protection Agency, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.

depending on the vehicle type. The USEPA and the NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.

b) State

ii) California Building Standards

A. California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, effective on January 1, 2023.[3] The 2022 Title 24 standards continue to improve upon the preceding versions of Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.

B. California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.[4] The 2022 CALGreen Code improves on the preceding versions of the CALGreen Code by simplifying the code and its application by offering choices related to new voluntary measures to builders, including battery storage systems, electric heat pump space, and water heating that encourage building electrification. The 2022 CALGreen Code went into effect on January 1, 2023.

C. California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017-

[3] Though the 2025 Title 24 standards will take effect on January 1, 2026, the 2022 Title 24 standards will apply, because the project is already in plan check.

[4] California Building Standards Commission, Guide to the 2022 California Green Building Standards Code Nonresidential, 2022.

2025.[5],[6] In March 2020, the NHTSA and the USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe CO_2 emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.

D. California Air Resources Board

(i) Scoping Plan

AB 32, enacted in 2006, required California to reduce its GHG emissions to 1990 levels by 2020. AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code [HSC] Section 38561 (h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[7] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

(ii) Advanced Clean Cars Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[8] The program requires a greater number of zero-emissions vehicle (ZEV) models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

E. SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associate with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips.

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5 California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.

6 United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, 2012.

7 California Air Resources Board, Climate Change Scoping Plan, 2008.

8 California Air Resources Board, Clean Car Standards – Pavley, Assembly Bill 1493, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed June 1, 2024.

Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) reflects CARB's updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035.

2. Existing Conditions

Electricity supply is provided to the Project Site by Southern California Edison (SCE) and natural gas is supplied to the Project Site by SoCal Gas. The existing camp uses on the Project consume approximately 27,429 kWh of electricity per year and 127,203 kBTU of natural gas per year (see CalEEMod calculations included in Appendix B of this Draft EIR).

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if it would:

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

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

b) Project-Specific Impacts

Impact ENERGY-1: The Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, Project impacts related to energy resources would be less than significant.

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption (during operation only), and transportation fuels such as diesel and gasoline. The analysis below addresses the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (demolition, construction, operations, maintenance and removal activities).

Construction

As shown in Table IV.G-1, a total of 162,946 kWh of electricity, 5,966 gallons of gasoline, and 18,716 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to start in 2026 and be completed by 2028.

Electricity and Natural Gas

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electric equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project

Site by SCE and would be obtained from the existing electrical lines that connect to the Project Site.

Table IV.G-1
Summary of Fuel Use During Project Construction[1]

Fuel Type	Quantity
Electricity	
Water Consumption	162,946 kWh
Gasoline	
On-Road Construction Equipment	5,966 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***5,966 gallons***
Diesel	
On-Road Construction Equipment	1,030 gallons
Off-Road Construction Equipment	17,686 gallons
Total Diesel	***18,716 gallons***
Total Petroleum-Based Fuel	**24,682 gallons**

[1] *Detailed calculations are included in Appendix I of this Draft EIR.*
[2] *Off-road construction equipment uses diesel fuel.*

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas, and the use of natural gas-powered equipment is not anticipated as part of Project construction. Accordingly, natural gas would not be supplied to support Project construction activities.

As shown in Table IV.G-1, a total of approximately 162,946 kWh of electricity is anticipated to be consumed during all phases of Project construction. The electricity demand would be associated with water usage to control fugitive dust at the site. Dust control would occur only during ground-disturbing activities and would cease during the building construction phase.

Although a measurable use of electric equipment is not anticipated during the Project's construction phase, all construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment. As such, the demand for electricity during construction would not cause wasteful, inefficient, or unnecessary use of energy.

Transportation Energy

The petroleum-based fuel use summary provided in Table IV.G-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix I of this Draft EIR. Construction assumptions assume that the maximum activity (equipment usage and truck trips) would occur every day even though such activity would not occur throughout the entire construction phase. As shown, on- and off-road vehicles would consume an estimated 5,966 gallons of gasoline and approximately 18,716 gallons of diesel fuel throughout the Project's construction period (2026–

2028). For comparison purposes, the fuel usage during Project construction would represent approximately 0.05 percent of the annual on-road gasoline-related energy consumption and 0.02 percent of the annual diesel fuel-related energy consumption in Ventura County.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (e.g., haul trucks, worker vehicles, etc.) would be subject to federal and state fuel efficiency requirements. Thus, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production of materials used during the construction of the Project or used during the operational life of the Project or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration and may lead to a false or misleading level of precision in reporting. The production methods and source of construction materials are not known. Also, it is not known how Project building materials (steel, concrete, lumber) would be recycled or disposed at end of life. As energy usage would vary widely depending on the production methods, source location, recycling, or disposal methods used for building materials, it would be speculative to assess energy usage for production and disposal of Project building materials. Manufacture and transport of materials related to Project construction and operation are expected to be regulated under regulatory energy efficiency requirements. Thus, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.G-2, the Project's energy demand would be approximately 168,720 kWh of electricity per year, 768,625 1,000 British thermal units (kBTU) per year, 53,026 gallons of gasoline per year, and 12,939 gallons of diesel fuel per year.

On-going state and local conservation efforts result in the regular incorporation and adoption of new energy conservation measures in green building codes such as CALGreen. Thus, it is difficult for a project to incorporate energy conservation measures that are not already required to be part of a project. Nonetheless, the Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards, such as orienting the buildings to take

advantage of solar access and to provide for passive cooling, thus reducing energy demand. In addition, the Project would comply with state energy efficiency requirements and would use electricity from SCE, which has a renewable energy mix of approximately 33 percent.[9] The Project's use of renewable energy would indirectly reduce use of fuels required for electricity generation (natural gas, coal, and oil). While the Project's electricity usage rate would not be directly affected by the availability of renewable energy, the Project's usage of renewable energy procured by SCE would indirectly reduce consumption of fossil fuels.

Table IV.G-2
Estimated Project Energy Consumption[1]

Land Use	Energy Usage
Electricity	
Camp Facilities	166,431
Surface Parking	2,289
Total	**168,720 kWh/yr**
Natural Gas	
Camp Facilities	768,625
Surface Parking	0
Total	**768,625 kBTU/yr**
Transportation[2]	
Gasoline	53,026
Diesel	12,939
Total	**65,965 gallons/yr**

sf = square feet kWh/y = kilowatt hour per year kBTU = 1,000 British thermal units
yr = year

1 Electricity and natural gas consumption was calculated in CalEEMod (refer to Appendix B of this Draft EIR).
2 Refer to Appendix I of this Draft EIR.

With regard to on-site renewable energy sources, Title 24 requires photovoltaic and battery storage systems for new construction. In compliance, the Project would include solar panels. Due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. The California Energy Commission (CEC) studied the state's high wind resource potential.[10] Based on a map of California's wind resource potential, the Project

9 Southern California Edison, 2022 Power Content Label, https://www.energy.ca.gov/filebrowser/download/6072, accessed January 27, 2025.
10 Wind Resource Areas (2023), California Energy Commission, https://cecgis-caenergy.opendata.arcgis.com/datasets/CAEnergy::wind-resource-areas-2023/explore?location=34.279688%2C-118.516866%2C18.90, accessed January 27, 2025.

Site is not identified as an area with wind resource potential. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current known reserves oil production would be sufficient to meet over 47 years of consumption.[11] The Project transportation fuel consumption during operations would represent 0.03 percent of the cumulative, annual gasoline and diesel usage within Ventura County. The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also result in lower emissions by complying with California's Low Carbon Fuel Standards (LCFS), which are designed to not only reduce GHG emissions but would also result in fuel savings in addition to compliance with CAFE standards. The Project would have a negligible effect on the transportation fuel supply.

In sum, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, nor are there any additional renewable energy features that could feasibly be incorporated into the Project, and Project construction and operation activities would result in less-than-significant impacts on energy resources.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact ENERGY-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, Project impacts related to this issue would be less than significant.

The Project would be required to meet all mandatory energy efficiency requirements outlined in the 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, including those related to building materials for roofs, walls, insulation, doors, and windows, HVAC, lighting, and appliances. Additionally, the Project would be consistent with the energy conservation strategies of SCAG's RTP/SCS, which emphasizes reducing energy demand through efficient land use, building performance, transportation strategies, and renewable energy adoption.

The Project consists of replacing and building additional camp facilities within the existing American Jewish University (AJU) Camp Alonim property, located in a developed institutional setting. Because the Project expands an existing use rather than developing new, dispersed uses, the Project supports SCAG's Smart Growth strategies that call for accommodating growth in areas with existing infrastructure and services. This consolidation of development minimizes the need

[11] Worldometer, Oil Left in the World, https://www.worldometers.info/oil/#:~:text=World%20Oil%20Reserves&text=The%20world%20has%20proven%20reserves,levels%20and%20excluding%20unproven%20reserves)., access January 27, 2025.

for new off-site energy infrastructure and reduces the overall energy footprint compared to greenfield development.

The Project includes a 58-space parking lot to support the modest increase in campers and event attendees. At the same time, the Camp's programmatic model emphasizes group attendance, bus/shuttle use, and shared trips, which reduce single-occupant vehicle travel. This group-oriented transportation model reduces VMT per person, consistent with SCAG's RTP/SCS policies to minimize transportation-related fuel use and support regional energy conservation.

The Project's landscaping improvements provide opportunities to incorporate water-efficient irrigation systems, drought-tolerant plants, and shade trees, consistent with CALGreen and SCAG's broader sustainability framework. Such measures indirectly reduce energy demand by lowering water pumping and treatment needs across the regional system. Further, the Project design is compatible with the integration of renewable energy features (e.g., solar-ready rooftops, EV charging infrastructure). SCAG encourages such measures as part of its regional strategy to advance California's renewable energy transition and decarbonization goals.

By expanding an existing institutional use within a developed setting, ensuring compliance with modern energy codes, supporting shared transportation practices, and incorporating sustainable landscaping, the project furthers SCAG's RTP/SCS policies aimed at reducing regional energy demand and reliance on fossil fuels. Collectively, these project features align with SCAG's energy conservation concepts and contribute to long-term regional sustainability and efficiency goals.

Thus, based on all the information above, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, Project impacts related to this issue would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As described above, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and Project construction and operation would result in less than significant impacts related to energy. Like the Project, the related projects would be required to meet all applicable mandatory energy efficiency requirements for new construction. Thus, the Project does not have the potential to contribute to any potential cumulative energy impacts. Therefore, no significant cumulative energy impacts associated with development of the Project in concert with the related projects would occur.

Mitigation Measures

No significant cumulative impacts related energy have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to energy would be less than significant

IV.H GEOLOGY AND SOILS

This section provides an evaluation of the potential Project impacts associated with geologic and geotechnical issues associated with developing the Project Site. Some of the analysis and information relied on in the assessment of Project impacts is from the following sources, which are included as Appendices E-1, E-2, and E-3 (respectively) of this Draft EIR:

E-1 Geologic and Geotechnical Engineering Investigation, Proposed Cabins and Welcome Center, Brandeis-Bardin Campus, Simi Valley, California, GeoSoils Consultants, Inc., March 31, 2022.

E-2 Response to County of Ventura Geology Portion of the Incompleteness Letter Dated April 22, 2022, GeoSoils Consultants, Inc., July 12, 2022.

E-3 Paleontological Resources Technical Report for the American Jewish University – Camp Alonim Expansion Project, SWCA Environmental Consultants, February 2025.

1. Regulatory Setting

a) Federal

i) National Pollutant Discharge Elimination System (NPDES)

The NPDES Program has been responsible for substantial improvements to the water quality in the United States since 1972. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of Best Management Practices (BMPs). NPDES permits are required by Section 402 of the Clean Water Act.[1]

ii) Society for Vertebrate Paleontology Standard Guidelines

The Society for Vertebrate Paleontology (SVP) has established standard guidelines that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. As defined by the SVP, significant nonrenewable paleontological resources are:

> *Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage.*

[1] USEPA, Clean Water Act, Section 402: National Pollutant Discharge Elimination System, https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system, accessed June 17, 2024.

Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.

As defined by the SVP, significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

Based on the significance definitions of the SVP, all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

b) State

i) Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act) was signed into law December 22, 1972 (revised in 1994) and codified into State law in the Public Resources Code (PRC) as Division 2, Chapter 7.5 to address hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating development near active faults. As required by the Alquist-Priolo Earthquake Fault Zoning Act, the State has delineated Earthquake Fault Zones (formerly Special Studies Zones) along known active faults in California, which vary in width on either side of the fault trace from about 200 to 500 feet. The State Geologist is also required to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Local agencies enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requirement. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project that is within an Alquist-Priolo Earthquake Fault Zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that habitable structures will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a distance to be established by a California Certified Engineering Geologist. Although setback distances may vary, a minimum 50-foot setback is typically required.

ii) Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Sections 2690-2699.6). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones. Project geologic and soil conditions of applicable project sites must be investigated and appropriate mitigation measures, if necessary, incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plans and to encourage the adaptation of land use management policies and regulations to reduce and mitigate seismic hazards to protect public health and safety.

iii) California Building Code

The California Building Code (CBC), which is codified in Title 24 of the California Code of Regulations (CCR), Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24, or those standards are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building, structure, or any appurtenances connected or attached to such buildings or structures throughout California.

The 2022 edition of the CBC is based on the 2021 International Building Code (IBC) published by the International Code Council. the 2022 edition of the CBC was published by the California Building Standards Commission on July 1, 2022, and became effective January 1, 2023. Every three years, the State adopts new codes (known collectively as the California Building Standards Code) to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. Sections 17922, 17958 and 18941.5 of the California Health and Safety Code require that the latest edition of the California Building Standards Code apply to local construction 180 days after publication.

2. Environmental Setting

a) Existing Site Conditions

The Project Site is located within the southeastern part of Simi Valley on the eastern flanks of Meier Canyon (refer to Figure IV.H-1). Meier Canyon is a tributary to the Arroyo Simi drainage channel located north of the Project Site. The area addressed in the *Preliminary Geologic and Geotechnical Engineering Investigation* consists of the west sloping surface between Peppertree Lane and the main canyon bottom, as shown in Figure IV.H-2. This area consists of a broad surface elevated above the main canyon bottom to the west. Two tributary canyons pass through the site before entering Meier Canyon. One of the tributaries is located along the northern part of the Project Site, and one passes through the central part of the site. The two tributary canyons continue to ascend to the east and above the site. The slope gradients range from flatter than 10:1 on the elevated surfaces to 2:1 along the sides of the central tributary channel.

Previous grading was performed on the site, and fill was placed on the elevated surfaces at the approximate locations shown in Figure IV.H-2. In addition, it appears that the steeper slopes along the western part of the site were cut to create a wider valley floor. The gradient of these slopes is locally steeper than 2:1. The area of the proposed welcome center appears to be located in an area cut out of the original hillside.

b) Geologic Conditions

i) Regional Geologic Setting

The Project Site is located within the Transverse Ranges Geomorphic province of California. The Transverse Ranges consist of generally east-west trending mountains and valleys, in contrast to the north-northwest regional trend elsewhere in the state.

The structure of the Transverse Ranges is controlled by the effects of north-south compressive deformation (crustal shortening), which is attributed to convergence between the big bend of the San Andreas Fault north of the San Gabriel Mountains and the motion of the Pacific Plate. The valleys and mountains of the Transverse Ranges are typically bounded by a series of east west trending, generally north dipping reverse faults with left-lateral oblique movement.

The Transverse Ranges are characterized by a very thick, nearly continuous sequence of Upper Cretaceous through Quaternary sedimentary rocks that has been deformed into a series of east-west trending folds associated with thrust and reverse faults. This deformation has created intra-basin highlands and intervening lowlands. The closest active fault to the site is the Simi Fault, located approximately 2.9 miles north of the Project Site. A regional geologic map is included as Figure IV.H-3.



Figure IV.H-1
Site Location Map

Source: GeoSoils Consultants Inc., 2022.



Source: Abramson Architects, 2022.

Figure IV.H-2
Local Geologic Map

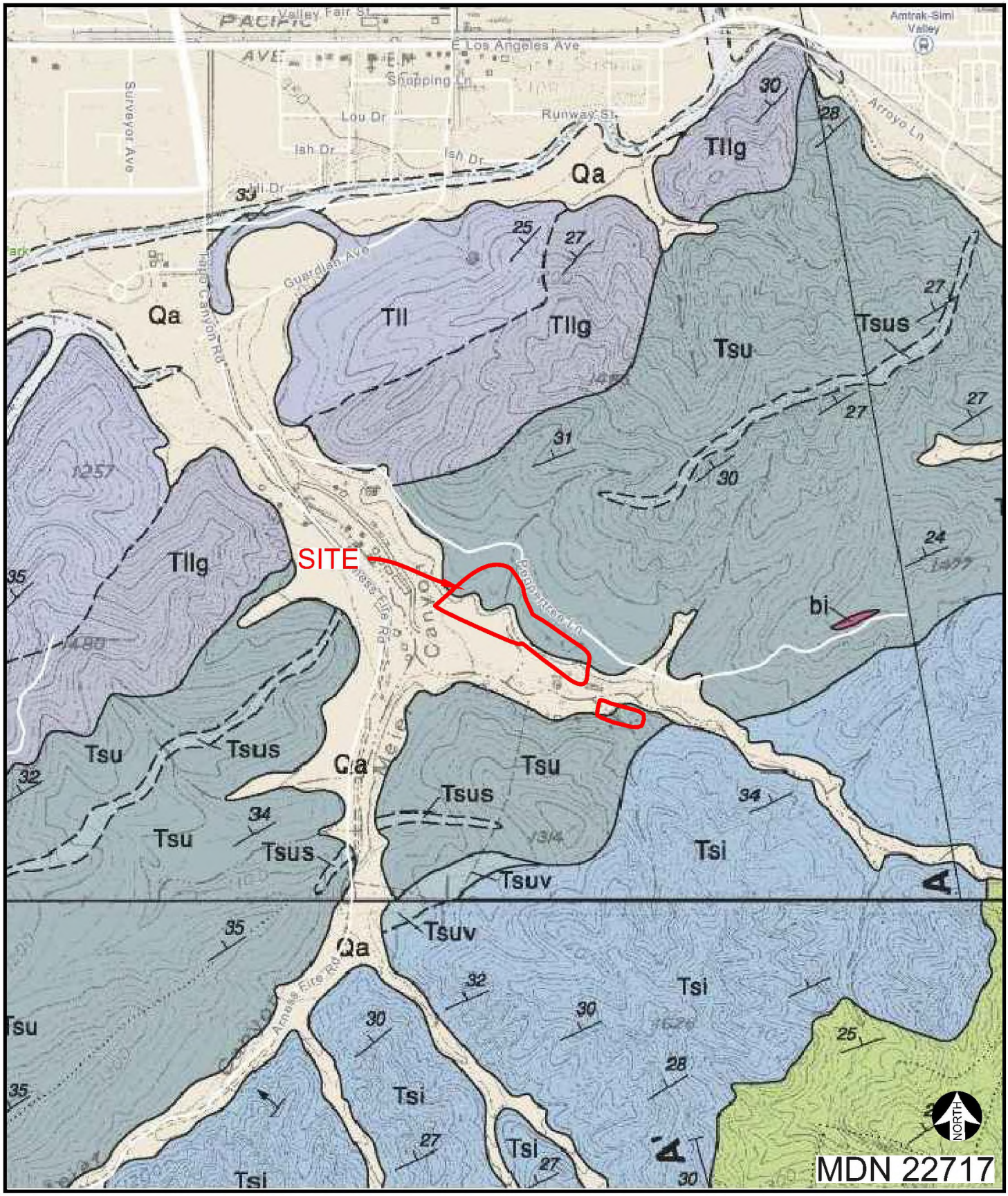


Figure IV.H-3
Regional Geologic Map

Source: GeoSoils Consultants Inc., 2022.

ii) Local Geologic Setting

Simi Valley has accumulated over 500 feet of alluvial sediments derived from erosion of the surrounding hills and mountains. Younger alluvium is present on the valley floor as well as in the canyons that drain into the valley. Older alluvium is exposed along the margins of the valley and in the hills near the Oak Park and Canada de la Brea oil fields. Higher elevations are underlain predominantly by bedrock of the Tertiary-Age Santa Susana, Llajas, and Sespe Formations. Conejo volcanics are exposed in portions of the western Simi Valley, whereas the eastern end of the valley is dominated by the Cretaceous-Age Chatsworth formation. The Project Site is underlain by terrace deposits and previously placed fill.

A. Earth Units

Artificial fill and terrace deposits underlie the property. A brief description of the earth materials are as follows:

Artificial Fill (af): The artificial fill consisted of yellowish brown, silty, fine to coarse sand with gravel and some cobbles. The fill is loose to medium dense and dry to slightly moist. The fill is up to 11 feet thick is the central part of the site (refer to Figure IV.H-2). The artificial fill is uncertified and unsuitable for structural support. Therefore, it should be removed and recompacted in areas of proposed grading.

Quaternary Terrace Deposits (Qt): The terrace deposits consisted of reddish brown, silty/clayey, fine to coarse sands with gravel and cobbles, and is dense to very dense and slightly moist to moist. These deposits were derived from runoff of the adjacent Simi Hills and were deposited on the valley floor. The test pits excavated at the southwestern part of the site encountered abundant cobbles and boulders and were difficult to excavate with a backhoe.

B. Surface and Subsurface Water Conditions

Surface water on the Project Site is limited to precipitation falling directly on the site and from the two tributary canyons that extend offsite to the east. Springs or seeps were not observed on the site.

Groundwater has been encountered in the borings excavated at the site at depths of 12 to 14 feet.

iii) Faulting and Seismicity

The Project Site is not within an Alquist-Priolo Earthquake Fault Zone and is not located within a Seismic Hazard Zone (refer to Figure IV.H-4).

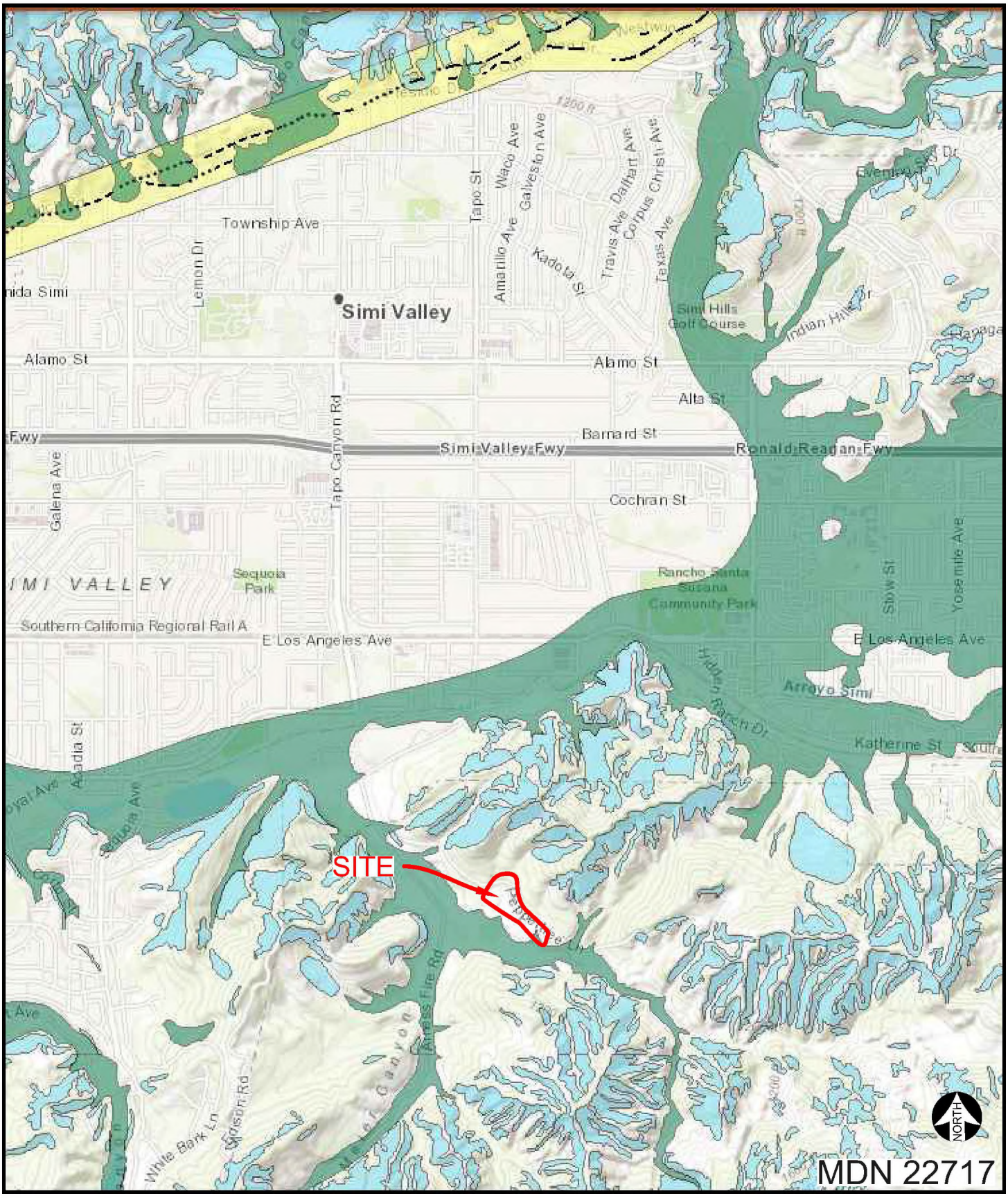


Figure IV.H-4
Seismic Hazard Zone Map

Source: GeoSoils Consultants Inc., 2022.

A. Ground Shaking and Seismic Design Criteria

This site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. The 2022 CBC (California Building Code) seismic coefficient criteria are provided here for structural design consideration as a mitigation for ground shaking.[2]

Under the Earthquake Design Regulations of Chapter 16, Section 1613 of the CBC 2019, and based on the mapped values, the referenced coefficients and factors apply to the lateral-force design for the proposed structures at the site, as shown in Table IV.H-1.

Table IV.H-1
2019 CBC Section 1613, Earthquake Loads

Site Class Definition	D
Mapped Spectral Response Acceleration Parameter, S_s (Table 1613.3.1 for 0.2 second)	1.652
Mapped Spectral Response Acceleration Parameter, S_1 (Table 1613.3.1 for 1.0 second)	0.6
Site Coefficient, F_a (Table 1613.3.3(1) short period)	1.2
Site Coefficient, F_v (Table 1613.3.3(2) 1-second period)	1.7
Adjusted Maximum Considered Earthquake Spectral Response Acceleration Parameter	1.983
Adjusted Maximum Considered Earthquake Spectral Response Acceleration Parameter	1.020
Design Spectral Response Acceleration Parameter, S_{DS} (Eq. 16-39)	1.322
Design Spectral Response Acceleration Parameter, S_{D1} (Eq. 16-40)	0.68

Notes: Location: Longitude: 34.2581, Latitude: -118.7099

1. Site Class Designation: Class D is recommended based on subsurface condition.
2. Ss, SMs, and SDs are spectral response accelerations for the period of 0.2 second.
3. S1, SM1, and SD1 are spectral response accelerations for the period of 1.0 second.
4. These values may only be utilized where the value of the seismic response coefficient, Cs, Satisfies equations 12.8.3 or 12.8.4 of the ASCE Standard 7-16.

Note that the 2019 CBC was current at the time of preparation of the Geotechnical Investigation (included in Appendix E-1 of this Draft EIR) and therefore, this is the version of the CBC that is addressed in that report. However, the Project would be required to comply with the 2022 CBC.

Source: GeoSoils Consultants, Inc., 2022. Refer to Appendix E-1 of this Draft EIR.

Conformance to the above criteria for seismic activity does not constitute any kind of guarantee or assurance that significant structural damage or ground failure will not occur if a maximum magnitude earthquake occurs. The primary goal of seismic design is to protect life and to prevent as much damage as possible.

[2] The 2019 CBC was current at the time of preparation of the Geotechnical Investigation (included in Appendix E-1 of this Draft EIR) and therefore, this is the version of the CBC that is addressed in that report. However, the Project would be required to comply with the 2022 CBC.

B. Ground Rupture

Ground rupture occurs when movement on a fault breaks through to the surface. Surface fault rupture usually occurs along pre-existing fault traces where zones of weakness already exist. The State has established Earthquake Fault Zones for the purpose of mitigating the hazard of fault rupture by prohibiting the location of most habitable or human occupancy structures across the traces of active faults. Earthquake Fault Zones are regulatory zones that encompass surface traces of active faults with a potential for future surface fault rupture.

The CGS establishes criteria for faults as active, potentially active or inactive. Active faults are those that show evidence of surface displacement within the last 11,000 years (Holocene age). Potentially active faults are those that demonstrate displacement within the past 1.6 million years (Quaternary Age). Faults showing no evidence of displacement within the last 1.6 million years may be considered inactive for most structures.

Consequently, the State of California prohibits the construction of occupied "habitable" structures within the designated fault zone, and it must be demonstrated that the structure does not encroach within a 50-foot setback from the fault trace. Per the Alquist-Priolo legislation, no structure for human occupancy is permitted on the trace of an active fault.

The term "structure for human occupancy" is defined in the California Building Code as any structure used or intended for supporting or sheltering any use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year. Unless proven otherwise, an area within 50 feet of an active fault is presumed to be underlain by active branches of the fault.

The Project Site is not located within an established Earthquake Fault Zone (refer to Figure IV.H-4). The Simi Fault is mapped approximately 2.9 miles to the north of the site. The Simi Fault is a left-oblique reverse fault within the Simi-Santa Rosa fault zone, a series of north-dipping faults that trend southwest from the northeastern end of Simi Valley to the Oxnard plain. The available stratigraphic and age data at the site provide a broadly constrained estimate of Holocene slip rate of about one millimeter per year. The fault is considered active and is located within an Alquist-Priolo Earthquake Fault Zone.

The Project site is not located within a Fault Hazard Zone, and there are no known active faults on the site. Therefore, the potential for ground rupture on the site is considered low.

C. Landsliding

Earthquake-induced landsliding often occurs in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical, and subsurface groundwater conditions are conducive to permanent ground displacements.

The Project Site does not contain slopes susceptible to landsliding and is not located within a seismic hazard zone. The slope areas to the east of the site are located within landslide hazard zones and are mapped "Potential Earthquake-Induced Landslides" with one area mapped as

"Actual and Potential Landslides."[3] However, according to the Geotechnical Report prepared for the Project Site (included in Appendix E-1 of this Draft EIR), the potential for earthquake-induced landsliding is considered low and these slopes are not considered to represent a landslide hazard to the site.

D. Seiches and Tsunamis

A seiche is the resonant oscillation of a body of water, typically a lake or swimming pool caused by earthquake shaking (waves). The hazard exists where water can be splashed out of the body of water and impact nearby structures. No bodies of constant water are near the Project Site. The closest body of water of significance is Bard Reservoir, located about six miles southwest of the site. Thus, hazards associated with seiches at the Project Site are considered low.

Tsunamis are seismic sea waves generated by undersea earthquakes or landslides. When the ocean floor is offset or tilted during an earthquake, a set of waves are generated similar to the concentric waves caused by an object dropped in water. Tsunamis can have wavelengths of up to 120 miles and travel as fast as 500 miles per hour across hundreds of miles of deep ocean. Upon reaching shallow coastal waters, the once two-foot-high wave can become up to 50 feet in height causing great devastation to structures within reach. Tsunamis can generate seiches as well. The Project Site is located approximately 15 miles north of the Pacific Ocean, and the tsunami hazard is considered very low.

E. Liquefaction

Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motion creates excess pore pressures in cohesionless soils. These soils may thereby acquire a high degree of mobility, which can lead to lateral sliding, consolidation and settlement of loose sediments, sand boils, and other damaging deformation. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes.

Liquefaction susceptibility is related to numerous factors and the following conditions must exist for liquefaction to occur: 1) sediments must be relatively young in age and must not have developed large amounts of cementation, 2) sediments must consist mainly of cohesionless sands and silts, 3) the sediments must not have a high relative density, 4) free groundwater must exist in the sediment, and 5) the site must be exposed to seismic events of a magnitude large enough to induce straining of soil particles.

The proposed cabins are located outside the limits of the designated area of liquefaction potential presented on the State of California Seismic Hazard Zone map (refer to Figure IV.H-4) and are underlain by terrace deposits. Therefore, liquefaction is not considered a potential hazard for the cabins. The proposed welcome center is located within a zone of potential liquefaction. Previous studies to the north of the proposed welcome center encountered dense older alluvium that was not subject to liquefaction. Similar conditions are anticipated around the welcome center, and additional exploration would be performed when access becomes available.

[3] https://maps.ventura.org/arcgis/rest/services/SDs/PlanningGIS_Hazzards/MapServer

F. Seismic Settlement

The Project Site is underlain by dense terrace deposits that are not subject to seismically induced settlement provided that the grading recommendations presented in the *Preliminary Geologic and Geotechnical Engineering Investigation* are followed.

G. Expansive Soils

Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. According to the Preliminary Geotechnical Investigation, the Project Site soils indicate an expansion index of 29, which is in the low range.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

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

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42) or County of Ventura designated Fault Hazard Area;

   ii. Strong seismic ground shaking;

   iii. Seismic-related ground failure, including liquefaction;

   iv. Landslides/mudflows;

b) Not be designed in accordance with all applicable requirements of the Ventura County Building Code;

c) Result in substantial soil erosion or the loss of topsoil;

d) Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

e) Be located within 10 to 20 feet of vertical elevation from an enclosed body of water, resulting in the potential for seiches to occur at the project site;

f) Be located within a mapped area of tsunami hazard as shown on County General Plan maps;

g) Be located on expansive soil (expansion index of >130), creating substantial direct or indirect risks to life or property;

h) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or

i) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Issue "c" related to soil erosion is addressed in detail in Section IV.K, Hydrology and Water Quality, of this Draft EIR, and is not addressed below.

b) Project-Specific Impacts

Impact GEO-1: The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or County designated Fault Hazard Area, and no known active faults are located on the Project Site. Therefore, no impacts related to ground rupture would occur as a result of the Project.

The Project Site is not located within an established Alquist-Priolo Earthquake Fault Zone (refer to Figure IV.H-4) or County designated Fault Hazard Area.[4] The Simi Fault is mapped approximately 2.9 miles to the north of the site. The Simi Fault is a left-oblique reverse fault within the Simi-Santa Rosa fault zone, a series of north-dipping faults that trend southwest from the northeastern end of Simi Valley to the Oxnard plain. The available stratigraphic and age data at the site provide a broadly constrained estimate of Holocene slip rate of about one millimeter per year. The fault is considered active and is located within an Alquist-Priolo Earthquake Fault Zone. There are no known active faults on the site. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Therefore, no impacts related to ground rupture would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GEO-2: The Project Site is located in a seismically active region. However, the Project would be required to be designed and constructed in accordance with current building code standards and all applicable recommendations in the geotechnical investigation. Therefore,

[4] Ventura County General Plan, Figure 7-1 Hazards Protection Map, April 8, 2019.

Project impacts related to seismic ground shaking would be less than significant.

The Simi Fault is mapped approximately 2.9 miles to the north of the site. Given the proximity of the Project Site to the Simi Fault and numerous other active and potentially active faults in the region, the site will likely be subject to earthquake ground motions in the future. However, the Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in the geotechnical investigation prepared for the Project (refer to Appendix E-1) and any updates made in a final geotechnical report. Conformance with the current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to seismic ground-shaking would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GEO-3: The Project Site is not susceptible to liquefaction. Therefore, no impacts related to liquefaction would occur as a result of the Project.

The proposed cabins are located outside the limits of the designated area of liquefaction potential presented on the State of California Seismic Hazard Zone map (refer to Figure IV.H-4) and are underlain by terrace deposits. Therefore, liquefaction is not considered a potential hazard for the cabins. The proposed welcome center is located within a zone of potential liquefaction. Previous studies to the north of the proposed welcome center encountered dense older alluvium that was not subject to liquefaction. Similar conditions are anticipated around the welcome center, and additional exploration would be performed when access becomes available. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, no impacts related to liquefaction would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GEO-4: The Project Site does not contain any landslides. Therefore, no impacts related to landslides would occur as a result of the Project.

The Project Site does not contain slopes susceptible to landsliding and is not located within a seismic hazard zone. Thus, the potential for earthquake-induced landsliding is considered low. The slope areas to the east of the site are located within landslide hazard zones. However,

according to the Geotechnical Engineering Investigation prepared for the Project Site, these slopes are not considered to represent a landslide hazard to the site as they appear to be comprised of mostly bedrock with a thin layer of topsoil. Therefore, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to landslides would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GEO-5: The loose terrace deposits at the Project Site are not adequate for development. The Project would be required to comply with all applicable recommendations in the geotechnical report, which includes recommendations for removal and/or compaction of these deposits. Through compliance with the geotechnical report, Project impacts related to geologic instability would be less than significant.

The Project Site is underlain by dense terrace deposits that are not subject to seismically induced settlement provided that the grading recommendations presented in the geotechnical investigation (refer to Appendix E-1) are followed. The Project would be required to comply with all applicable recommendations in the geotechnical report including those recommendations related to settlement, including removal, replacement, and/or compaction of soils susceptible to settlement, that would ensure the Project would not be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Additionally, the Project Site is not located within the probable subsidence hazard zone as delineated on the Ventura County General Plan Hazards Appendix Figure 2.8. Additionally, the Project does not include water, oil, or gas withdrawal, and the potential for subsidence to occur as a result of the Project is minimal. Therefore, Project impacts related to geologic instability would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant

Impact GEO-6: The Project Site does not contain expansive soils. Therefore, no impacts related to expansive soils would occur.

According to the geotechnical investigation (included in Appendix E-1 of this Draft EIR), the Project Site soils indicate an expansion index of 29, which is in the low range. Therefore, no impacts related to expansive soils would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GEO-7: The Project would not directly or indirectly destroy a unique paleontological resource, and impacts would be less than significant. Implementation of Mitigation Measure GEO-1 would further ensure that impacts with respect to paleontological resources are less than significant.

As discussed in the Paleontological Resources Technical Report (included in Appendix E-3 of this Draft EIR), the Project's Area of Potential Impacts (API) for paleontological resources occupies approximately 8.5 acres in the center of the Project Site. The API contains artificial fill, which has no paleontological sensitivity, and young alluvial fan deposits, which have low paleontological sensitivity based on their very coarse-grained nature and inferred high-energy depositional environment that would have a lower potential for preserving important paleontological resources. Although the Santa Susana Formation, which has high paleontological sensitivity, is mapped in the API, no evidence of this formation was noted during the field exploration for either the Project's geotechnical report or paleontological resources report. Ground disturbance for this Project is limited in horizontal extent, with the majority of this disturbance anticipated to extend to depths of approximately five feet or less, and only excavation for one cabin reaching a depth of approximately 14.5 feet. As such, ground-disturbing activities associated with the Project are expected to remain in deposits with no or low paleontological sensitivity and are unlikely to extend deep enough to reach deposits with high paleontological sensitivity. Therefore, impacts to scientifically significant paleontological resources from Project activities are also unlikely. In the unlikely event that paleontological resources are encountered during Project construction activities, the Project would implement Mitigation Measure MM-GEO-1, which would ensure that impacts with respect to paleontological resources are less than significant.

Mitigation Measures

MM-GEO-1 Paleontological Resources

Purpose: To avoid impacts to paleontological resources during construction activities.

Requirement: In the event paleontological resources are encountered during Project construction activities, work within 25 feet of the discovery shall be halted, and a Qualified Professional Paleontologist, defined as one who meets the standards set forth by the Society of Vertebrate Paleontology and the *County of Ventura Initial Study Assessment Guidelines,* shall be retained to assess the discovery and make appropriate recommendations regarding handling the resources and subsequent paleontological work.

Documentation: If paleontological resources are encountered, the Permittee shall submit a report prepared by a County-approved paleontologist including recommendations for the proper disposition of the resource.

Timing: If paleontological resources are uncovered during ground disturbing activities, the Planning Director shall be notified in writing within three days. The report prepared by the County-approved paleontologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the paleontologist's report (if applicable), and shall maintain such documents in the Project file.

Level of Significance After Mitigation

With implementation of Mitigation Measure MM-GEO-1, Project impacts with respect to paleontological resources would be less than significant.

c) Cumulative Impacts

Impacts associated with the geology and soils topics addressed in this section are generally Project-specific and are assessed on a site-specific basis. The cumulative projects discussed in Section III, Environmental Setting, of this Draft EIR, would have the potential for their own project-specific impacts associated with geology and soils, but such potential impacts would not create the potential for combining with the Project impacts discussed above. Therefore, the Project would not incrementally contribute to cumulatively considerable geology and soils impacts.

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, state, and federal regulations for seismic safety. Thus, cumulative impacts with respect to geology and soils would be less than significant. With regard to potential cumulative impacts to paleontological resources, such potential impacts are generally site-specific as they relate to the particular underlying conditions of a site. As discussed above, the Project's impacts to paleontological resources would be less than significant. Similarly, each related project would be assessed for the potential to encounter paleontological resources, and if necessary, would implement mitigation measures. Therefore, cumulative impacts with respect to paleontological resources would be less than significant.

Mitigation Measures

No significant cumulative impacts related to geology and soils have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to geology and soils would be less than significant.

IV.I GREENHOUSE GAS EMISSIONS

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, the Southern California Association of Governments (SCAG), and the County to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. The information and analysis presented below are primarily based on the following source, which is included as Appendix F of this Draft EIR:

F GHG Technical Modeling, DKA Planning, August 2025.

1. Environmental Setting

a) Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit (ºF). However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.

Global attempts to address the control of GHG emissions and adaptation to climate chang e include:

- Kyoto Protocol. In August 2007, international climate talks led by the United Nations Framework Convention on Climate Change led to the recognition that global GHG emissions must be reduced. It found that avoiding catastrophic events would require reducing GHG emissions by 25 to 40 percent below 1990 levels.

- Paris Agreement. In December 2015, the U.S. entered into this global accord, which had a goal of keeping a global temperature rise this century below 2 degrees Celsius (ºC) above pre-industrial levels and limit the temperature increase further to 1.5ºC. Initially a strong supporter under the Obama administration, the U.S. committed to reducing greenhouse gas emissions by up to 28 percent below 2005 levels by 2025. However, in 2017, the Trump administration announced its intent to withdraw, citing economic concerns, and the U.S. formally exited in 2020. This decision was reversed in early 2021 when President Biden rejoined the accord, restoring the nation's participation and signaling renewed commitment to climate action. Today, the U.S. continues to work with other signatories to advance emissions reductions, develop clean energy technologies, and strengthen global climate resilience.

b) GHG Fundamentals

GHGs are those compounds in Earth's atmosphere that play a critical role in determining temperature near Earth's surface. GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). More specifically, these gases allow high-frequency shortwave solar radiation to enter Earth's atmosphere but retain some of the low frequency infrared energy which is radiated back from Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in Table IV.I-1.

Not all GHGs possess the same ability to induce climate change. Carbon dioxide is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of carbon dioxide (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2. The larger the GWP, the more that a given gas warms Earth compared to CO_2 over that time.

Table IV.I-1
Description of Identified GHGs[a]

GREENHOUSE GAS	GENERAL DESCRIPTION
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride, January 2009.

Table IV.I-2
Atmospheric Lifetimes and Global Warming Potentials

GAS	ATMOSPHERIC LIFETIME (YEARS)	GLOBAL WARMING POTENTIAL (100-YEAR TIME HORIZON) (AR4 ASSESSMENT)	GLOBAL WARMING POTENTIAL (100-YEAR TIME HORIZON) (AR5 ASSESSMENT)
Carbon Dioxide (CO_2)	50-200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

Source: IPCC, *Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials.*

c) Projected Impacts of Global Warming in California

In 2009, California adopted a Statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The California Natural Resources Agency will be updating the CAS and is responsible for preparing reports to the Governor on the status of the CAS. The Natural Resources Agency has produced climate change assessments, which detail impacts of global warming in California. These include:

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes, resulting in public health impacts.

- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures, and saltwater contamination, resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought, secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.

2. Regulatory Framework

a) Federal

i) Federal Clean Air Act

The USEPA is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, U.S. EPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation. Additional discussion of the CAA is provided in Section IV.D, Air Quality, of this Draft EIR.

b) State

i) California Air Resources Board

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. CARB has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

ii) California Greenhouse Gas Reduction Targets

A. Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

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

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. The CAT provides periodic reports to the Governor and Legislature on the state of GHG reductions in the State, as well as strategies for mitigating and adapting to climate change.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

B. Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2e ($MMTCO_2e$).

C Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new Statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and

accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

In October 2020, CARB released a study, which evaluated three scenarios that achieve carbon neutrality in California by 2045. The study was used by CARB in development of the 2022 Scoping Plan update.[1] More ambitious carbon reduction scenarios that achieve carbon neutrality prior to 2045 may be considered as part of future analyses by the State.

The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO_2 removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80-percent reduction in GHGs by 2045, relative to 1990 levels. Remaining CO_2 would be reduced to zero by applying CO_2 removal strategies, including sinks from natural and working lands and negative emissions technologies, such as direct air capture.[2,3]

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

D. California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines regulated GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce Statewide GHG emissions from

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1 Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

2 Sinks are defined as natural or artificial reservoirs that accumulate and store a carbon-containing chemical compound for an indefinite period.

3 Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.

stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.[4]

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill associated with SB 32, which prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

E. Climate Change Scoping Plan

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.[5] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving

[4] CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are (1) a low-carbon fuel standard, which reduces carbon intensity in fuels Statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.

[5] CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[6] The 2017 Scoping Plan Update,[7] shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[8] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Table IV.I-3 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

[6] CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

[7] CARB. 2017. California's 2017 Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

[8] CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

Table IV.I-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in the 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to

Table IV.I-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.

The 2022 Scoping Plan Scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan.[9] It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and

[9] https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf

commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the Green New Deal and Green Building Code. Each of these is discussed further below.

F. Cap-and-Trade Program

The Climate Change Scoping Plan identified a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990

levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors was established, and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[10] pursuant to its authority under AB 32. The Cap-and-Trade Program was designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The Statewide cap for GHG emissions from the capped sectors[11] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program.[12] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).[13]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[14] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the Statewide emission limits will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[15] Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from

[10] California Code of Regulations 17, Section 95800 to 96023.

[11] California Code of Regulations 17, Section 95811, 95812.

[12] California Code of Regulations 17, Section 95812.

[13] California Code of Regulations 17, Section 95100-95158.

[14] Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

[15] California Code of Regulations 17, Section 95811(b).

combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[16]

The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

G. Energy-Related (Stationary) Sources

Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewables Portfolio Standard

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as an RPS. Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the state to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030. The 2017 Climate Change Scoping Plan incorporated the SB 350 standards and estimated the GHG reductions would account for approximately 21 percent of the Scoping Plan reductions.[17] On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.[18]

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[16] California Code of Regulations 17, Section 95811, 95812(d).

[17] CARB, California's 2017 Climate Change Scoping Plan, Table 3, p. 31, November 2017. Calculated as: (108 – 53) / 260 = 21 percent.

[18] California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

H. Mobile Sources

Pavley Standards

AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In 2004, CARB approved the Pavley regulation to require automakers to control GHG emissions from new passenger vehicles for the 2009 through 2016 model years.

California Low Carbon Fuel Standard

Executive Order S-01-07 was enacted by Governor Arnold Schwarzenegger on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a LCFS for transportation fuels be established in California.

The development of the 2017 Scoping Plan Update has identified LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20-percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[19]

Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars program, an emissions-control program for model years 2015–2025.[20] The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[21] During the March 2017 midterm review, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.[22]

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19 CARB, CARB amends Low Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed August 1, 2024.

20 CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, Accessed August 1, 2024.

21 CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, Accessed August 1, 2024.

22 CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective, Accessed August 1, 2024.

I. Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), which was adopted by the State on September 30, 2008, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Additional discussion of SB 375 is provided in Section IV.G, Energy, of this Draft EIR.

J. Senate Bill 743

Governor Jerry Brown signed Senate Bill (SB) 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

K. Building Standards and Other Regulations

Title 24, Building Standards Code and CALGreen Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[23] The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established

[23] California Building Standards Commission, 2010 California Green Building Standards Code, (2010).

and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[24]

L. CEQA Guidelines

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring OPR to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.[25] The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[26]

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[27]

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[24] Ibid.

[25] See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

[26] 14 Cal. Code Regs. § 15064.4(b).

[27] Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

c) Regional

i) SCAG Regional Transportation Plan/Sustainable Communities Strategy

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS in September 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services, such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier due to an expanded regional charging network.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[28] By 2045, the integrated growth forecast estimates that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas[29] (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[30] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. As discussed

[28] 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

[29] Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours

[30] SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, 2020.

above, OPR recommended that achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal). The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

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

Neither VCAPCD nor the County has adopted a threshold of significance applicable to GHG emissions from projects subject to the County's discretionary land use permitting authority.

In 2008, the South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds. The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, such commercial and residential projects would have been assumed to have a less than significant impact on climate change. However, this proposed screening threshold was not adopted by the SCAQMD.

In addition, the County has routinely applied a 10,000 metric tons carbon dioxide equivalent per year ($MTCO_2e$/year) threshold of significance to industrial projects, in accordance with CEQA Guidelines Section 15064.4(a)(2).

Therefore, while there is no adopted numeric threshold of significance that would apply to the GHG emissions emitted by the Project, the County's Initial Study Assessment Guidelines (ISAG) note that the VCAPD currently evaluates project GHG emissions according to the GHG emissions thresholds recommended by the SCAQMD. If it is deemed not appropriate to use the GHG emissions thresholds recommended by the SCAQMD, the County shall provide substantial evidence for the use of another threshold.

Based on the above, the analysis provided below uses the threshold recommended by the SCAQMD for commercial and residential projects, as the scope of the Project would fit within the definition of a commercial and residential project. Therefore, if the Project would result in an

increase of greater than 3,000 $MTCO_2e$ per year,[31] the Project would be considered to result in a significant impact with respect to GHG emissions.

b) Project-Specific Impacts

Impact GHG-1: The Project would not generate GHG emissions in excess of the County's threshold. Therefore, Project impacts related to generation of GHG emissions would be less than significant.

The Project would increase GHG emissions by approximately 554 $MTCO_2e$/year as summarized in Table IV.I-4. This is a conservative estimate that assumes the maximum number of campers, temporary events, and assembly use occur every day. Nevertheless, these emissions would be well below the 3,000 $MTCO_2e$/year recommended threshold of significance. Therefore, Project impacts related to the generation of GHG emissions would be less than significant.

Table IV.I-4
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Emission Source	$MTCO_2e$
Area[b]	<1
Energy[c] (electricity and natural gas)	68
Mobile	1,070
Solid Waste[d]	12
Water/Wastewater[e]	9
Refrigerants	<1
Construction[f]	20
Total Emissions	**1,179**
Existing Emissions	**-625**
Net Emissions	**554**

a CO_2e was calculated using CalEEMod and the results are provided in Appendix F.
b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
f. Emissions amortized by 30 years pursuant to CARB guidance.

Source: DKA Planning, 2025.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

[31] In *Upland Community First v. City of Upland* (2024) 105 Cal.App.5th 1,), the California Fourth District Court of Appeal upheld the City's use of a 3,000 metric tons of CO_2e per year ($MTCO_2e$/yr) threshold as a quantitative significance cutoff under CEQA. The court found that the threshold was supported by substantial evidence. The project's net greenhouse gas emissions were calculated to fall below that threshold.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact GHG-2: The Project would be consistent with applicable plans related to reducing GHG emissions. Therefore, Project impacts related to consistency with GHG emissions reduction plans would be less than significant.

As a minor expansion of largely seasonal operations of a local camp, the Project would be consistent with CARB's 2022 Scoping Plan's calls for reducing per capita vehicle miles traveled (VMT) by consolidating the demand for more recreational activities in an existing facility. It would also be consistent with SCAG's 2020-2045 RTP/SCS' objectives to reduce per capita VMT by increasing access to local parks, as illustrated in Table IV.I-5.

The Project would be consistent with the County of Ventura's Climate Action Plan (CAP), as integrated into the 2040 General Plan, and sets community-wide GHG reduction targets—41 percent below 2015 levels by 2030, 61 percent by 2040, and 80 percent by 2050—and relies on a mix of land-use, energy, water, transportation, waste, and adaptation measures to meet those targets. The CAP frames policies across multiple General Plan elements so that new development and public facilities reduce emissions and increase resilience.

The Project would advance a number of policies in the County's Climate Action Plan, 2040 General Plan's Hazards and Safety Element, as well as the Conservation and Open Space Element by advancing Title 24 energy conservation requirements in the new facilities, planting 110 trees that would increase urban greening, and including rain barrels and other water conservation measures to reduce potable water consumption.

The CAP and Public Facilities and Parks policies emphasize energy efficiency and on-site renewable generation where feasible, water conservation and drought-resilient landscaping and irrigation, solid waste reduction and organics diversion, multimodal access and trip-reduction strategies, and site design that preserves open space and tree canopy while addressing wildfire risk and public safety.

Implementation actions that would apply to the Proposed Project include efficient building systems (lighting, HVAC, hot water), low-flow plumbing fixtures, high-efficiency irrigation, on-site EV charging or EV-ready parking, use of renewable energy or all-electric building systems, construction waste diversion, and coordination with county hazard and parks policies for wildfire safety, access, and operations. The Project's consistency with the CAP is illustrated in Table IV.I-6.

Table IV.I-5
Consistency with the 2024-2050 RTP/SCS

Performance Measure	Consistency Analysis
Decrease average distance traveled for non-work trips to 6.1 miles by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley.
Increase share of all trips ten miles or less from 46.9 to 47.6 percent by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley. It would potentially reduce the need for longer travel of over ten miles to other recreational facilities.
Increase share of all trips 25 miles or less from 80.1 to 80.7 percent by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley. It would potentially reduce the need for longer travel of over 25 miles to other recreational facilities.
Increase share of all trips by SOV from 37.0 to 34.7 percent by 2050.	**Consistent.** The Project would likely increase the number of carpool trips to and from the facilities as parents or adults pick up and drop off students at Camp Alonim.
Decrease share of all trips by SOV from 48.7 to 46.3 percent by 2050.	**Consistent.** The Project would likely increase the number of carpool trips to and from the facilities as parents or adults pick up and drop off students at Camp Alonim.
Reduce person hours of delay on highways from 1,266,283 to 1,024,863 by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley. This would potentially reduce the need for travel on highways, as the Project may cater to local residents and their school-age children.
Increase share of non-work trips less than three miles to 41.8 percent	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley.
Increase share of population able to reach a park within 30 minutes by auto to 99.6 percent by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley. This could appeal to local residents in the Moorpark-Simi Valley, and North San Fernando Valley communities that could reach Camp Alonim within 30 minutes.

Table IV.I-5
Consistency with the 2024-2050 RTP/SCS

Performance Measure	Consistency Analysis
Increase share of population able to reach a park within 30 minutes by transit from 57.6 to 62.1 percent by 2050.	**Consistent.** The Project would increase the scope of activities on the Project Site that would reduce the need for longer travel to other recreational facilities, as it would be about one mile southeast of the Los Angeles Avenue corridor in Simi Valley. This could appeal to local residents in the Moorpark-Simi Valley, and North San Fernando Valley communities that could reach Camp Alonim within 30 minutes.
Source: DKA Planning, 2025.	

Table IV.I-6
Consistency with the County of Ventura Climate Action Plan

CAP Goal/Policy/Action	Consistency Analysis
COS-10.2/COS-10.3 (GHG reduction targets (community-wide: 41% by 2030, 61% by 2040))	**Consistent.** The Project would design buildings and operations to minimize energy and transportation emissions (electrify heating/cooking, LED lighting; encourage carpooling/shuttle for campers).
Public Facilities Energy Efficiency; CAP Building Energy sector (Energy efficiency & on-site renewable energy)	**Consistent.** The Project would integrate high-efficiency building envelope and systems, battery-ready infrastructure, and all-electric appliances where practical.
Water Resources Element; PFS-10.3 (Solid Waste Reduction and Organics Diversion)	**Consistent.** The Project would include on-site recycling and composting for operations and include construction waste diversion during build-out.
Conservation & Open Space Element (Site design to preserve trees/open space)	**Consistent.** The Project would retain mature trees, increase canopy/shade, minimize impervious surfaces.
Green procurement and operations.	**Consistent.** The Project would utilize low-carbon, low-toxicity materials and provide environmental education for campers.
Construction best practices	**Consistent.** The Project would include Best Management Practices pursuant to VCAPCD regulations to reduce dust/emissions, low-emission construction equipment, waste diversion.
Source: DKA Planning, 2025.	

Thus, the Project would be consistent with relevant State and local climate change plans and programs. Therefore, Project impacts related to consistency with GHG emissions reduction plans would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As explained above, the analysis of a project's GHG emissions is inherently a cumulative analysis because climate change is a global issue and the emissions from individual projects are negligible in a global context. Given the Project's consistency with state, regional, and local plans adopted for the purpose of reducing GHG emissions, it is concluded that the Project's incremental contribution to cumulative GHG emissions and their effects on climate change would not be considerable. Therefore, cumulative impacts with respect to GHG emissions would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.J HAZARDS AND HAZARDOUS MATERIALS

This section provides an evaluation of the potential Project impacts associated with hazards and hazardous materials. Some of the analysis and information relied on in the assessment of Project impacts is from the following source, which is included as Appendix G of this Draft EIR:

G Phase I Environmental Site Assessment, Langan, October 2023.

1. Regulatory Setting

a) Federal

i) Resource Conservation and Recovery Act

The federal Resource Conservation and Recovery Act (RCRA) (42 United States Code [USC] Sections 6901-6992k), which amended and revised the Solid Waste Disposal Act, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own programs for the regulation of hazardous waste if they are at least as stringent as RCRA's.

Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for UST installations installed after December 22, 1988, as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

ii) Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, providing for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also establishes the National Priorities List, which is a list of contaminated sites warranting further investigation by the U.S. Environmental Protection Agency (USEPA). CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

iii) Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling and emergency response. OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right–to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA (Cal/OSHA) program (codified in the California Code of Regulations [CCR], Title 8, or 8 CCR generally and in the Labor Code Sections 6300-6719) is administered and enforced by the California Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

In addition, pursuant to OSHA, a developer that undertakes a construction project that involves the handling of contaminated site conditions must prepare and implement a Health and Safety Plan (HASP) that sets forth the measures that would be undertaken to protect those that may be affected by the construction project. While a HASP is prepared and implemented pursuant to OSHA, the HASP is not subject to regulatory review and approval, although a HASP is typically appended to a Soil Management Plan if this document is required by the Certified Unified Program Agency (CUPA). A CUPA is a local agency certified by the California Environmental Protection Agency (CalEPA) to administer and enforce several state environmental programs at the local level, pursuant to California Health and Safety Code Division 20, Chapter 6.11. In Ventura County, the CUPA is designated through Ventura County Ordinance Code Division 4, Chapter 5, Article 1, and is responsible for implementing six state-mandated hazardous materials and hazardous waste programs, including the California Accidental Release Prevention (CalARP) program, Hazardous Materials Business Plan (HMBP) requirements, and oversight of underground storage tanks. As the CUPA, the Ventura County Environmental Health Division ensures local compliance with applicable state laws and regulations governing the management, storage, and handling of hazardous materials. Projects that involve the use or storage of hazardous substances may be subject to CUPA review and oversight to ensure proper permitting, risk management planning, and emergency preparedness in accordance with state and local requirements. The HASP, if required of the Project, would be prepared in accordance with the most current OSHA regulations, including 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, and 29 CFR 1926, Construction Industry Standards, and other applicable federal, state, and local laws and regulations.

iv) Toxic Substances Control Act

In 1976, the Federal Toxic Substances Control Act (TSCA) (15 USC Sections 2601–2671) established a system of evaluation to identify chemicals that may pose hazards. TSCA is enforced by the USEPA through inspections of places in which asbestos-containing materials (ACMs) are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, is used to enforce injunctions against violators. TSCA establishes a process

by which public exposure to hazards may be reduced through manufacturing, distribution, use, and disposal restrictions or labeling of products. Polychlorinated Biphenyls (PCBs) are hazardous materials regulated by the USEPA under the TSCA. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. PCBs were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, and electrical transformers, among others. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the Hazardous Waste Control Law (HWCL), which lists PCBs as hazardous waste.

Under TSCA, the USEPA has enacted strict requirements on the use, handling, and disposal of ACMs. These regulations include phasing out friable asbestos and ACMs in new construction materials beginning in 1979. In 1989, the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the currently banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

v) Hazardous Materials Transportation Act

The U.S. Department of Transportation (USDOT) prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 USC Section 5101 et seq. The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 CFR Parts 100-185. Title 49 CFR contains the regulations set forth by the HMTA and specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary of USDOT "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce.

vi) Uniform Fire Code

The Uniform Fire Code (UFC), Article 80 (UFC Section 80.103 as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for

a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of a catastrophic spill.

vii) Federal Emergency Management Act

Federal Emergency Management Act (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

viii) Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 USC Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Native American tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, Tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of this act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal

share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

ix) Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, other applicable federal laws also address hazardous materials. These include:

- Community Environmental Response Facilitation Act (CERFA) of 1992;
- Clean Water Act[1];
- Clean Air Act[2];
- Safe Drinking Water Act;
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

b) State

i) State Policies and Regulations

The primary state agencies with jurisdiction over hazardous chemical materials management are the California Environmental Protection Agency's (CalEPA) Department of Toxic and Substance Control (DTSC) and the State Water Resources Control Board (SWRCB). Other state agencies involved in hazardous materials management include Cal/OSHA and the State Office of Emergency Services (Cal OES).

Authority for the statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary state responsibility in regulating the generation, storage, and disposal of hazardous waste, inspection and enforcement authority at the local level is done by the CUPA or a CUPA Participating Agency (PA). In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in USTs is regulated by the SWRCB, which delegates authority to the Regional Water Quality Control Board (RWQCB) on the regional level, and typically to the CUPA or PA on the local level.

The Cal/OSHA program is administered and enforced by the DOSH. Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written IIPP. An IIPP is an

[1] Refer to Section IV.K. Hydrology and Water Quality, of this Draft EIR.
[2] Refer to Section IV.D, Air Quality, of this Draft EIR.

employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Cal OES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

ii) California Hazardous Materials Release Response Plans and Inventory Law of 1985

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California Health and Safety Code [HSC], Division 20, Chapter 6.95, Article 1). Statewide, CalEPA has primary regulatory responsibility for management of hazardous materials, with delegation of authority to CUPAs and PAs which are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and Caltrans enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

iii) Hazardous Waste and Substances Sites

Government Code Section 65962.5, amended in 1992, requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese List), which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document used by the state, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from the DTSC Envirostor database (HSC Sections 25220, 25242, 25356, and 116395);
2. List of open and active leaking underground storage tank (LUST) Sites by County and Fiscal Year from the SWRCB GeoTracker database (HSC Section 25295);

3. List of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051);
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB (California Water Code [CWC] Sections 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to HSC Section 25187.5, identified by the DTSC.

iv) Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) empowers DTSC to administer the State's hazardous waste program and implement the federal program in California. CCR Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

v) License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

The California Department of Transportation (Caltrans) regulates hazardous materials transportation on all interstate roads. Within California, the state agencies with primary responsibility for enforcing federal and state regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

vi) Underground Storage Tanks Program

The State regulates USTs through a program pursuant to HSC, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/ or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the SWRCB which has delegated authority to the RWQCB and typically on the local level, to the fire department.

v) Aboveground Petroleum Storage Act

In 1989, California established the Aboveground Petroleum Storage Act instituting a regulatory program covering aboveground storage tanks (ASTs) containing specified petroleum products (HSC Sections 25270–25270.13). The Aboveground Petroleum Storage Act applies to facilities with petroleum storage capacities of 1,320 gallons or more or are subject to oil pollution prevention and response requirements under 40 CFR Part 112. In 2013 CAL FIRE-Office of the State Fire Marshal (OSFM) became the lead oversight agency for the implementation of the Aboveground Petroleum Storage Act (APSA), with CUPAs and PA implementing the program at the local level. Under the Aboveground Petroleum Storage Act, each owner or operator of a regulated AST facility

must file a storage statement in the California Environmental Reporting System (CERS) disclosing the name and address of the AST facility; the contact person for the facility; and the location, size, age, and contents of each AST that exceeds 10,000 gallons in capacity and that holds materials that are at least five percent petroleum. In addition, each owner or operator of a regulated AST must prepare a Spill Prevention Control and Countermeasure Plan in accordance with federal and state requirements (40 CFR Part 112 and HSC Section 25270.4.5(a). The responsibility for inspecting ASTs and ensuring that Spill Prevention Control and Countermeasure Plans have been prepared lies with CUPAs or PAs

vi) Lead-Based Paint Regulations

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has a one milligram per square centimeter (mg/cm2) (5,000 microgram per gram [µg/g] or 0.5 percent by weight) or more of lead. The US Consumer Product Safety Commission (16 CFR 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978 are much more likely to have LBP.

The demolition of buildings containing LBPs is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California HSC.

v) California Division of Occupational Safety and Health

The California DOSH, better known as Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials (8 CCR, Section 1529). Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead. OSHA applies to this Project because contractors will be required to comply with its handling and use requirements that would increase worker safety and reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

vi) The Safe Drinking Water and Toxic Enforcement Act

The Safe Drinking Water and Toxic Enforcement Act (HSC Section 25249.5, et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans. It also restricts the discharges of listed chemicals into known drinking water sources above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

vii) California Public Resources Code Section 3229, Division 3

In compliance with Section 3229, Division 3 of the California Public Resources Code, before commencing any work to abandon any well, the owner or operator shall request approval from the California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR), via a written notice of intention to abandon the well.

viii) California Fire Code, Title 24, Part 9, Chapters 33, 50 and 57

The California Fire Code (CFC), Chapter 9 of Title 24 of the CCR, was created by the California Building Standards Commission based on the International Fire Code (IFC) and is updated every three years. The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the storage, use, and handling of hazardous materials, as well as the development and enforcement of fire safety standards. The 2022 CFC, which is based on the 2021 IFC, became effective January 1, 2023.

ix) California Standard Emergency Management System Program

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Title 19 CCR Section 2401 *et seq.*), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local governments request assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the State. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with the local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

x) Emergency Managers Mutual Aid (EMMA) Plan

Cal OES developed the Emergency Manager Mutual Aid (EMMA) Plan in response to the 1994 Northridge Earthquake. The EMMA Plan coordinates emergency response and recovery efforts along the coastal, inland, and southern regions of California. The purpose of EMMA is to provide emergency management personnel and technical specialists to afflicted jurisdictions in support of disaster operations during emergency events. Objectives of the EMMA Plan are to provide a system to coordinate and mobilize assigned personnel, formal requests, assignment, training, and demobilization of assigned personnel; establish structure to maintain the EMMA Plan and its procedures; provide the coordination of training for EMMA resources, including SEMS training, coursework, exercises, and disaster response procedures; and to promote professionalism in emergency management and response. The EMMA Plan was updated in November 2012 and supersedes the 1997 EMMA Plan and November 2001 EMMA Guidance.

ix) Risk Management Plan

Under the CalARP program, codified in California Health and Safety Code Division 20, Chapter 6.95, Article 2, certain facilities that handle regulated substances in excess of specified threshold quantities are required to prepare and implement a Risk Management Plan (RMP). The purpose of the RMP is to prevent the accidental release of hazardous materials that could pose a threat to public health and the environment and to ensure appropriate emergency response procedures are in place. The RMP must include a comprehensive hazard assessment, offsite consequence analysis, prevention program, and emergency response plan. Facilities subject to CalARP must submit their RMP to the appropriate CUPA for review and approval and must update the plan at least once every five years or when significant changes occur. Compliance with CalARP and preparation of an RMP ensures that risks associated with hazardous materials are properly managed in accordance with state law.

c) County

i) General Plan

The Hazards and Safety Element of the Ventura County 2040 General Plan contains several goals and related policies associated with hazards and safety, addressing the following topics:

- Wildfire Hazards
- Flood Hazards
- Coastal Flooding
- Geologic and Seismic Hazards
- Hazardous Materials
- Transportation Related Hazards
- Oil and Gas Production
- Military Compatibility
- Noise
- Air Quality

- Increasing Temperatures
- Emergency Response

ii) Local Hazard Mitigation Plan

The Ventura County Multi-Jurisdictional Hazard Mitigation Plan (HMP), adopted by the Board of Supervisors on July 12, 2022, and formally approved by FEMA on August 16, 2022, offers a unified strategy to reduce vulnerabilities and enhance resilience across all incorporated cities, unincorporated areas, and participating special-purpose districts within Ventura. The HMP is organized into two volumes: Volume 1 covers a comprehensive area-wide hazard risk assessment, hazard profiles, and countywide mitigation goals, while Volume 2, provides jurisdiction-specific annexes detailing tailored action items. Through extensive public-outreach efforts and coordinated stakeholder engagement, the HMP identifies key natural hazards, including seismic activity, floods, wildfires, landslides, dam failure, sea-level rise, severe storms, drought, and tsunamis, and ranks them based on assessed risk to life, property, infrastructure, and economic interests. The HMP establishes a forward-looking vision, targeted goals, and measurable objectives to promote cost-effective mitigation, bolster community resilience (especially in socially vulnerable areas), and integrate mitigation with other planning frameworks. A robust list of over 300 mitigation actions, including countywide initiatives like maintaining a public access plan website, enhancing public education programs (e.g., VCAlert, CERT, TsunamiReady), and providing a virtual mitigation resource hub, supports sustained implementation and public involvement. The HMP also sets forth procedures for ongoing monitoring, maintenance, and integration with other planning efforts and enables local jurisdictions to maintain eligibility for state and FEMA hazard mitigation funding.

2. Environmental Setting

a) Existing Site Conditions

A *Phase I Environmental Site Assessment* (Phase I ESA) was prepared for the Project Site by Langan, dated October 2023 (refer to Appendix G of this Draft EIR). The purpose of the Phase I ESA was to provide a professional opinion on the presence of recognized environmental conditions and other suspect environmental conditions in connection with the Project Site and to recommend whether further investigation is required. The goal of the Phase I ESA process is to identify Recognized Environmental Conditions (RECs), which are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

The Phase I ESA was based on the following:

- Records review and local government interviews;
- Site Reconnaissance and owner/operator/occupant interviews; and

- The preparation of the Phase I ESA report, which includes the findings of the evaluation and opinions regarding RECs and the need for any additional analysis/testing.

i) Physical Setting

The physical setting that includes the geologic, hydrogeologic, hydrologic, and topographic characteristics of the Project Site and surrounding area is discussed below.

A. Topography

The 2018 USGS 7.5-minute quadrangle topographic map for Simi Valley East depicts the Project Site at elevations that range from approximately 1,070 feet above mean sea level (amsl) in the northwestern portion of the Project Site to approximately 1,000 feet amsl in the southern portion of the Project Site. Based on observations and the topographic quadrangle map of the site, the Project Site is located within a valley with moderately sloping terrain to the southwest. However, the general topographic gradient within a one-mile radius of the site appears to be to the northwest.

B. Geology

According to a review of the California Department of Conservation Geologic Survey website, the Project Site is located within Eocene-age marine sedimentary rocks, which are characterized by mostly well-consolidated shale, sandstone, conglomerate, and minor limestone. According to the U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) Soil Survey Geographic (SSURGO) provided in the Environmental Data Resources (EDR) Regulatory Database Report (refer to Appendix G, Phase I ESA, sub-Appendix C), soils in the vicinity of the Project Site consist of Soper loam and gravelly loam, Los Osos clay loam, and Mocho clay loam. These soils are characterized as well-drained with moderate to slow infiltration rates.

C. Hydrogeology

According to aerial photographs and topographic maps, there are no surface water bodies present at the Project Site. However, there is an ephemeral surface water drainage that runs along the southern boundary of the site along the low point of the valley. There are additional intermittent surface water drainages in the surrounding valleys that appear to run towards Arroyo Simi, located approximately 0.75 miles northwest of the Project Site.

Information regarding site-specific groundwater flow direction is unavailable. Groundwater flow can be influenced by several factors such as surface water bodies, wetlands, hydrogeologic and anthropogenic variables. Based on the general topographic gradient of the area and surface water flow direction towards Arroyo Simi, it is expected that groundwater generally flows to the northwest.

According to the National Wetland Inventory database, there are no wetlands on the Project Site. The ephemeral surface water drainage that runs along the southern boundary of the site is classified as a riverine habitat.

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, a portion of the Project Site is mapped within a Zone X area of minimal flood hazard. However, the ephemeral surface water drainage that runs along the southern boundary of the Project Site is within a Zone A special flood hazard area with a one percent annual chance flood hazard.

A review of the GeoCheck section of the EDR Regulatory Database Report (refer to Appendix G Phase I ESA sub-Appendix C), the California Department of Conservation Geologic Energy Management Division's (CalGEM, formerly DOGGR) Well Finder application, and the SWRCB Groundwater Ambient Monitoring and Assessment (GAMA) database did not identify any wells at the Project Site. The closest water well is a water supply well located approximately 1,300 feet southeast of the site. The closest oil and gas well is a plugged dry hole operated by C. A. Paimer, Trustee located approximately 2,600 feet northwest of the Project Site.

D. Project Site Description

The Project Site consists of a mix of open land, structures, and both paved and unpaved roads. Structures in the western portion of the site include a garage used for storage, Varble Cottage (an empty house), Alonim Cottage (the Director's house), a dining hall, a solar panel array, an amphitheater, and a portion of a baseball field. Structures in the eastern portion of the site include a trailer used as a staff lounge, two trailers used for staff housing, and five shipping containers reportedly used for storage. Three of the storage containers were locked and inaccessible during a site reconnaissance. While the inability to access these storage containers is considered a data gap, it does not represent a significant data gap that would affect the conclusions of the Phase I ESA. The Project Site is accessed from Peppertree Lane.

ii) Hazardous Substances and Petroleum Products

Hazardous substance and petroleum product use at the Project Site is primarily related to operations at the dining hall. A five-gallon propane tank near two barbeques on the western side of the dining hall was observed during a site reconnaissance in addition to three additional five-gallon propane tanks in the shed on the eastern side of the dining hall, and a used cooking oil container in the shed with staining on the concrete beneath. The concrete appeared to be in relatively good condition, with no cracking. The kitchen in the dining hall reportedly utilizes a grease interceptor. The access points for the interceptor near the shed and concrete appeared to be in good condition. A boiler system on the eastern side of the dining hall, next to the shed, was observed and is reportedly fueled by gas and diesel stored in tanks located elsewhere on the Camp Alonim property (not on the Project Site).

In addition, used motor oil/steering fluid containers and paint cans in the garage and used fuel cans in the shipping containers were observed, but no staining in these areas was observed.

A. Underground Storage Tanks

As stated above, the kitchen in the dining hall reportedly utilizes a grease interceptor. The access points for the interceptor near the shed were observed, and no cracks were identified.

B. Aboveground Storage Tanks (ASTs)

No ASTs were observed during the site reconnaissance.

C. Drums, Totes, and Intermediate Bulk Containers

As described above, a used cooking oil container in the shed on the eastern side of the dining hall was observed, with staining on the concrete beneath. The concrete appeared to be in relatively good condition, with no cracking.

D. Other Chemical Storage, Containers, or Equipment

Cleaning supplies in a closet in the dining hall were observed. No staining was observed. Additionally, a pad-mounted transformer west of the dining hall was observed. The transformer appeared to be relatively new and in good condition.

iii) Waste Management

A. Hazardous Waste

No hazardous waste was observed during the site reconnaissance, other than the substances noted above.

B. Non-Hazardous Waste

Several trash cans located throughout the Project Site structures as well as a large dumpster located on the eastern side of the dining hall were observed.

C. Fill Areas or Solid Waste

No fill areas were observed during the site reconnaissance. As described above, several trash cans located throughout the Project Site structures were observed as well as a large dumpster located on the eastern side of the dining hall.

iv) Wastewater

Standard toilets, showers, sinks, and associated plumbing in the structures were observed at the Project Site. Interior floor drains in the dining hall kitchen were observed as well as next to the boiler system on the eastern side of the dining hall. No staining around these drains was noted. Sanitary sewer service is provided by the City of Simi Valley. No evidence of any septic tanks or cesspools at the Project Site was observed.

According to documents provided by the City of Simi Valley (refer to Appendix G, Phase I ESA, sub-Appendix E), AJU maintains a Wastewater Discharge Permit for two grease interceptors at the camp. As stated above, one of the interceptors is used by the kitchen in the dining hall on the Project Site. The interceptors are inspected regularly by the city. The provided documents do not indicate that there has been a release from the interceptor. Based on this information, the interceptor is not considered an environmental concern.

v) Stormwater

Stormwater at the Project Site flows to natural drainage areas, Meier Canyon Creek, and eventually to Arroyo Simi.

vi) History and Records Review

A. Historical Summary

Table IV.J-1 includes a summary compilation of the Project Site history based on a review of readily available and reasonably ascertainable sources and interviews. The historical review of the Project Site did not reveal environmental concerns.

Table IV.J-1
Project Site History

Time Period	Historical Discussion
1900s-1930s	The site is depicted as undeveloped on the 1903 topographic map. From 1925 to 1940, the site is located within an unmapped topographic area.
1940s-1960s	The 1941 topographic map depicts the ephemeral surface water drainage and vegetation along the southern boundary of the site. In 1947, Brandeis Camp Institute purchased 2,200 acres of land, inclusive of the site. The 1947 aerial photo depicts a long rectangular structure located in the eastern portion of the site. The remainder of the site appears to be undeveloped. The 1952 aerial depicts apparent grading work along the southern boundary of the site. By 1959, a second square-shaped structure is visible in the eastern portion of the site. Varble cottage, Alonim cottage, and a rectangular structure are visible in the western portion of the site. Additional structures are visible south of the site. Unpaved roads appear across the site. The site appears largely unchanged in the 1967 and 1969 aerial photographs.
1970s-early 2000s	The site is located within an unmapped topographic area in 1976. In 1977, the Brandeis Camp Institute changed names to the Brandeis-Bardin Institute (BBI). In the 1978 aerial photograph, Peppertree Lane is visible running through the northern portion of the Site. In the 1986 aerial photograph, the long rectangular structure is no longer visible in the eastern portion of the site and has been replaced by what appears to be a trailer. The garage near Varble cottage is also now visible. An orchard is visible along the northeastern boundary of the site. In the 1994 aerial photograph, another apparent trailer is visible in the eastern portion of the site. The corner of a baseball field is visible at the western boundary of the site. In the 2005 aerial photograph, the portion of the orchard along the northeastern boundary of the site is no longer visible. Another apparent trailer is visible in the eastern portion of the site.
Late 2000s-Present	In the 2009 aerial photograph, the square structure in the eastern portion of the site and the rectangular structure in the western portion of the Site are no longer visible. They have been replaced by the dining hall located in the southern central portion of the site. Another apparent trailer is visible in the eastern portion of the site. Vehicles are also visible in the eastern portion of the site. In the 2012 aerial photograph, the solar array is visible near the dining hall. Vehicles are no longer visible in the eastern portion of the site. In the 2020 aerial photograph, shipping containers are visible in the eastern portion of the site. The site appears largely unchanged through the present.

Table IV.J-1
Project Site History

Time Period	Historical Discussion
	The BBI is known today as the Brandeis-Bardon Campus of the AJU. The campus is home to Camp Alonim.
Source: Langan, 2023. Refer to Appendix G of this Draft EIR.	

B. Regulatory Database Review

Camp Alonim, AJU, and/or the BBI (all names for the land of which the Project Site is a part) are identified in the Hazardous Waste Tracking System (HWTS); Facility Index System (FINDS); Enforcement and Compliance History (ECHO); Ventura County (Co.) Business Plan, Waste Producers, and Underground Tanks (BWT); Facility and Manifest Date (HAZNET); Medical Waste Program List (Med Waste Ventura); California Integrated Water Quality System (CIWQS); Resource Conservation and Recovery Act (RCRA) Non Generators/No Longer Regulated (NonGen/NLR); and Underground Storage Tanks (UST) databases. Of the listings, only the HWTS listing appears to potentially pertain to the site specifically. The BBI was listed as a recycler of unspecified oil-containing waste in 1999. No violations or releases are reported. None of the remaining listings include indications of releases, violations, or other concerns. Therefore, these listings are not considered an environmental concern for the Project Site.

v) Adjoining Properties and Surrounding Area

A. Current Use of Adjoining Properties and Surrounding Area

The current use of adjoining and surrounding properties is summarized in Table IV.J-2.

Table IV.J-2
Current Use of Adjoining Properties and Surrounding Area

Direction	Adjoining Properties	Surrounding Area
North	Camp Alonim open land and cow pen	Open land followed by commercial/industrial and residential properties
East	Camp Alonim open land and picnic area	Open land
South	Camp Alonim buildings and open land	Open land followed by Santa Susana Field Laboratory (SSFL)
West	Camp Alonim buildings/recreation area and open land	Open land followed by residential properties
Source: Langan, October 2023. Refer to Appendix G of this Draft EIR.		

B. Adjoining Properties and Surrounding Area History

Table IV.J-3 includes compilation summaries of the adjoining properties and surrounding area history based on a review of historical resources and interviews.

Table IV.J-3
Historical Use of Adjoining Properties

Direction	Adjoining Properties
North	The northern adjoining property appears largely undeveloped with some unpaved roads through the 1970s. Peppertree Lane is visible by 1978. By the 1986 aerial photograph, orchards are visible north of the site. By 2005, the southern portion of the orchard is no longer visible. A small structure is visible near the northern orchard area. The property appears largely unchanged through 2012. In the 2020 aerial photograph, a portion of land just south of the northern orchard appears to be used as a lay down yard. What appears to be a cow pen is also visible just north of the site. The historical use of the northern adjoining property is not considered an environmental concern for the site.
East	The eastern adjoining property appears largely undeveloped with some unpaved roads through 2020. Peppertree Lane is visible by 1978. Orchards and vegetation are visible in the 2005 aerial photograph but have disappeared by the 2012 aerial photograph. The historical use of the eastern adjoining property is not considered an environmental concern for the site.
South	The southern adjoining property is depicted as undeveloped with some unpaved roads on the 1903 topographic map. The property is located within an unmapped topographic area from 1925 to 1940. In the 1947 aerial photograph, two structures are visible. By 1952, the area appears to be graded. By 1959, there are several structures visible. The property appears largely unchanged through 1978. In the 1983 aerial photograph, additional structures are visible. In the 1994 aerial photograph, the baseball field that overlaps with the northwestern portion of the site is visible. The property appears largely unchanged through the 2020 aerial photograph. The historical use of the southern adjoining property is not considered an environmental concern for the site.
West	The western adjoining property is depicted as undeveloped with some unpaved roads on the 1903 topographic map. The property is located within an unmapped topographic area from 1925 to 1940. In the 1947 aerial photograph, an orchard and several structures are visible. By 1959, the orchard is no longer visible. In the 1967 aerial photograph, what appear to be horse corrals are visible. The property appears largely unchanged through the 2020 aerial photograph. The historical use of the western adjoining property is not considered an environmental concern for the site.
Source: Langan, 2023. Refer to Appendix G of this Draft EIR.	

In the 1903 topographic map, the surrounding area appears to be largely undeveloped. The Southern Pacific Railroad is visible approximately one mile north of the Project Site. The surrounding property is located within an unmapped topographic area from 1925 to 1940. In the 1947 topographic map, the northern surrounding area appears to be used for agriculture. In the 1951/1952 topographic map, the Santa Susana Airport is visible approximately one mile north of the site. A flood control reservoir is visible approximately 1.25 miles northwest of the site. In the 1967/1969 topographic map, the northern surrounding area appears to be developed. The SSFL is visible in the southern surrounding area. By 2012, the railroad is no longer visible. The surrounding area appears largely uncharged through the 2018 topographic map.

vi) Regulatory Database Review

A. Adjoining Properties

The Project Site is adjoined by Camp Alonim land in all directions. Database listings for Camp Alonim are summarized above.

B. Surrounding Area

Langan evaluated each of the database listings for surrounding area properties. Those warranting further discussion in the context of potential to represent an environmental concern for the Project Site are discussed below.

Santa Susana Field Laboratory (approximately one mile southeast, inferred upgradient)

According to the DTSC Site Activity Overview for the facility, the SSFL is comprised of 2,849 acres jointly owned by The Boeing Company (Boeing), and the United States (U.S.) Government. The government property is administered by the National Aeronautics and Space Administration (NASA). A portion of the Boeing property is leased to the U.S. Department of Energy (DOE). Operational activities at SSFL began in 1948 and ended in 2006. DTSC oversees the environmental investigation, monitoring, and cleanup program of contamination at the facility. Boeing, DOE, and NASA are identified as the three Responsible Parties (RPs). The cleanup program is divided into five areas as described below.

- Area I: Area I consists of 671 acres owned and operated by Boeing and 42 acres administered by NASA. Area I contained administrative and laboratory facilities and was formerly used for rocket engine and component testing. Area I also includes the former Area I Thermal Treatment Facility and three rocket engine test areas: the Bowl, Canyon, and Advanced Propulsion Test Facility (APTF) areas. All test stands and administrative and laboratory facilities in Area I have been removed.
- Area II: Area II consists of 410 acres administered by NASA. Area II contained administrative and laboratory facilities and four rocket test firing facilities: Alfa, Bravo, Coca, and Delta. NASA has removed the administrative and laboratory facilities and the Delta test area. The Bravo and Coca test areas will be removed.
- Area III: Area III consists of 114 acres owned and operated by Boeing. Area III includes the systems test area (STL-IV) and associated laboratories. All Boeing facilities in Area III have been removed.
- Area IV: Area IV consists of 290 acres owned and operated by Boeing and 90 acres leased by the DOE. DOE sponsored nuclear and non-nuclear energy research and development projects in the area. Nuclear energy research and handling of nuclear materials in Area IV ended by 1988. All DOE buildings in Area IV have been removed. The remaining Boeing facilities will be removed.
- Buffer Areas: The buffer areas include 175 acres in the north and 1,140 acres in the south. Industrial activities have not occurred in these naturally vegetated areas.

In 2007, DTSC and the three RPs entered a Consent Order for Corrective Action to define the requirements for investigating contaminated soil and groundwater and to implement cleanup.

NASA and DOE entered into a subsequent agreement in 2010 that established the process to investigate and clean up soil to background levels. Extensive investigation and remediation at the facility has been ongoing since 2007.

In April 2016, Tetra Tech, Inc. (Tetra Tech) prepared a report titled *Environmental and Radiological Data Summary and Health Risk Evaluation for the American Jewish University Brandeis-Bardin Campus at Simi Valley, California* to evaluate if the SSFL had impacted the campus. Tetra Tech's scope included a literature review, gamma radiation survey, soil sampling, and risk evaluation for the campus. Tetra Tech concluded that the environmental and radiological conditions at the campus posed no unacceptable human health risk to campers, camp counselors, visitors, or residents.

In addition, regular testing is performed at the campus. In August 2023, GSI Environmental Inc. (GSI) prepared a report titled *2023 Monitoring Report American Jewish University, Brandeis-Bardin Campus 1101 Peppertree Lane Brandeis, California*. GSI collected samples of soil, sediments, water, and fruit from across the campus. GSI concluded that the analytical results for these samples appeared consistent with natural conditions and did not indicate impacts from the SSFL or other anthropogenic sources.

Based on the investigations that have been conducted at the campus, the SSFL is considered unlikely to represent an environmental concern for the Project Site.

v) Phase I ESA Conclusions, Findings, and Opinions

The assessment has revealed the de minimis condition. A "de minimis condition" refers to a condition related to the release or presence of hazardous substances or petroleum products on, at, or near a property that does not pose a threat to human health or the environment and would not typically be the subject of enforcement action if brought to the attention of regulatory authorities. No RECs, CRECs, HRECs, or significant data gaps were identified for the Project Site.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires;
8. Fail to comply with applicable state or local requirements or use hazardous materials in a manner that fails to comply with applicable state or local requirements;
9. Be inconsistent with the Hazards and Safety Element; or
10. Result in impacts to public health due to perchlorate or trichlorethylene (TCE) contamination.

b) Project-Specific Impacts

Impact HAZ-1: The hazardous materials used during the Project's construction and operational phase would be typical of those used in construction and that have been used during the historic operation of the recreational camp. The Project's use of hazardous materials would not create a significant hazard. Therefore, Project impacts related to this topic would be less than significant.

During the Project's construction phase, the types of hazardous materials that could be used would be typical materials necessary for the construction of a recreational camp facilities (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be conducted in accordance with all applicable federal, state, and local regulations governing such activities.

As an expansion of an existing recreational camp development, the Project would continue to use common types of cleaning products, paint, petroleum products, etc., all of which would be used and stored in accordance with manufacturer requirements. Thus, the Project would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to hazardous materials would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HAZ-2: The Phase I ESA prepared for the Project did not identify any hazardous conditions associated with the Project Site. Therefore, no impacts related to exposure to hazardous conditions would occur as a result of the Project.

As discussed in detail above, the Phase I ESA has revealed the de minimis condition. No RECs, CRECs, HRECs, or significant data gaps were identified for the Project Site. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, no impacts related to hazardous conditions associated with the Project Site would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HAZ-3: The Project is not located within 0.25 miles of a school, and no impacts related to hazardous emissions near a school would occur as a result of the Project.

The Project Site is not located within 0.25 miles of a school. The schools closest to the Project Site are over 1.5 miles away, and which include the following: Mountain View Elementary School, approximately 1.5 miles west of the Project Site; Santa Susana Elementary School, approximately 1.5 miles north of the Project Site; and Simi Valley High School, approximately two miles northeast of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to hazardous emissions near a school would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HAZ-4: The Project Site is not listed on a list compiled pursuant to Government Code § 65962.5 or within 0.5 miles of such site. No impacts related to listed hazardous materials sites would occur.

The Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5, nor is the site located within 0.5 miles of such a site. The closest site is at 4175 Guardian Street in Simi Valley, located approximately one mile north of the site. As a result, the Project would not create a significant hazard to the public or the environment. Therefore, no impacts related to listed hazardous materials sites would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HAZ-5: The Project Site would not impair an emergency response/evacuation plan, and the Project would comply with all applicable emergency access requirements. With implementation of Mitigation Measure FIRE-1, Project impacts related to emergency response and evacuation would be less than significant.

Project impacts with respect to emergency response and evacuation are addressed in detail in Section IV.R, Wildfire, of this Draft EIR. As discussed therein, the VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. The analysis contained in Section IV.R determined that with implementation of Mitigation Measure MM-FIRE-1, impacts related to emergency and evacuation would be less than significant.

Mitigation Measures

See Mitigation Measure MM-FIRE-1 in Section IV.M, Public Services – Fire, of this Draft EIR.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-FIRE-1 would ensure that the Project would not impair emergency evacuation, and this impact would be less than significant.

Impact HAZ-6: The Project Site is located within the boundaries of a Very High Fire Hazard Severity Zone. The Project would be required to implement Mitigation Measure HAZ-1 to ensure that Project impacts related to wildland fires would be less than significant.

According to Figure 7-3 (Fire Hazard Severity Zones) in the Hazards and Safety Element of the County's General Plan, the Project Site is located within the boundaries of a Local Responsibility

Area (LRA) – Very High wildfire hazard severity zone. Additionally, the California Board of Forestry and Fire Protection maps show that the site falls within the bound of the State Responsibility Area.

The Ventura County Fire Department implements a Wildland Fire Action Plan that includes a Fire Hazard Reduction Program (FHRP) that provides specifications for property owners to maintain property free of fire hazards and nuisance vegetation. The Ventura County Fire Code contains the specific requirements of the FHRP as well as other requirements pertaining to fire prevention.

As discussed in greater detail in Section IV.M, Public Services – Fire, of this Draft EIR, the camp maintains an Emergency Preparedness and Procedures Plan, updated annually, that provides procedures to be followed in the event of different types of emergencies, including a fire. See also Section IV.R, Wildfire, of this Draft EIR, for additional discussion of Project impacts with respect to wildfires. Mitigation Measure MM-HAZ-1 outlined below requires the Applicant to coordinate with the Ventura County Fire Department to develop and implement appropriate site management and maintenance plans. Compliance with applicable zoning, building, and fire codes and implementation of Mitigation Measure MM-HAZ-1 would ensure that the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, Project impacts related to this issue would be less than significant.

Mitigation Measures

To ensure that Project impacts related to wildland fires would be less than significant, the following mitigation measure is required:

MM-HAZ-1 Emergency Preparedness and Procedures Plan

Purpose: To minimize risk to the Project as a result of a fire or other emergency.

Requirement. The camp currently maintains an Emergency Preparedness and Procedures Plan that provides procedures to be follow in the event of different types of emergencies, including a fire. Prior to expanded operations under the Project, the Permittee shall do the following:

a) Coordinate with the Ventura County Fire Department to develop a Fire Protection Plan for the Project Site that substantially conforms to the Emergency Preparedness and Procedures Plan included in Appendix L-1 of this Draft EIR. The plan shall describe fire prevention measures including access and defensible space clearing requirements; potential fire scenarios; and action plans for each potential scenario which include notification, suppression, evacuation measures, and a plan for sheltering in place if recommended by VCFD, in the event of a fire within the Project Site or within adjacent areas. The Permittee shall comply with all applicable elements of the Emergency Preparedness and Procedures plan throughout the period of site operations.
b) Install and maintain emergency water distribution systems and/or other suitable fire suppression systems on the Project Site in compliance with State and County fire code.

Documentation: The Permittee shall submit an Emergency Preparedness and Procedures Plan, which incorporates the requirements listed above.

Timing: The Emergency Preparedness and Procedures Plan shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the Emergency Preparedness and Procedures Plan to the Planning Division and the Ventura County Fire Department for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Emergency Preparedness and Procedures Plan provided by the Permittee in the Project file.

Level of Significance After Mitigation

With implementation of Mitigation Measure MM-HAZ-1, Project impacts related to wildland fires would be less than significant.

4. Cumulative Impacts

Due to their site-specific nature, impacts with respect to hazards and hazardous materials are also typically addressed on a project-by-project basis. The analysis contained above determined that the Project's impacts with respect to hazards and hazardous materials would be less than significant (with Mitigation Measure MM-HAZ-1 for emergency access and evacuation). As with the Project, related projects would similarly investigate impacts related to hazards and hazardous materials and would include site-specific recommendations and/or mitigation measures, if necessary. In addition, like the Project, all related projects would be subject to local, state, and federal regulations pertaining to hazardous materials. Therefore, cumulative impacts with respect to hazards and hazardous materials would be less than significant.

Regarding cumulative impacts related to emergency access and evacuation, like the Project, all related projects would be required to comply with applicable requirements related to emergency access and evacuation, including the City of Simi Valley's emergency evacuation program and Ventura County's use of Temporary Evacuation Points (both discussed in greater detail in Section IV.R, Wildfire, of this Draft EIR). In addition, the majority of the related projects are not in close enough proximity to the Project Site such that they would use the same evacuation route as the Project. Compliance with existing regulations would ensure that cumulative evacuation impacts are less than significant.

Mitigation Measures

No significant cumulative impacts related to hazards or public safety have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to hazards and public safety would be less than significant

IV.K HYDROLOGY AND WATER QUALITY

This section provides an evaluation of the potential Project impacts associated with hydrology and water quality. Some of the analysis and information relied on in the assessment of Project impacts is from the following sources, which are included as Appendices H-1 and H-2 (respectively) of this Draft EIR:

H-1 Drainage Report, Stormwater Quality Analysis, and Low Impact Development, Stantec, August 17, 2023.

H-2 Meier Canyon Creek Floodplain Study, Stantec, March 15, 2023.

1. Regulatory Setting

a) Federal

i) Clean Water Act

The Clean Water Act (CWA), formerly known as the Federal Water Pollution Control Act, was first introduced in 1948, with major amendments in the 1960s, 1970s and 1980s.[1] The CWA authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments to the CWA in 1972 established the National Pollutant Discharge Elimination System (NPDES) permit program, which prohibits discharge of pollutants into the nation's waters without procurement of a NPDES permit from the United States Environmental Protection Agency (USEPA). The purpose of the permit is to translate general requirements of the Clean Water Act into specific provisions tailored to the operations of each organization that is discharging pollutants. Although federally mandated, the NPDES permit program is generally administered at the State and regional levels.

The USEPA NPDES Program requires NPDES permits for (1) Municipal Separate Storm Sewer Systems (MS4) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small MS4s, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

ii) Federal Antidegradation Policy

The Federal Antidegradation Policy has been incorporated within the Clean Water Act and requires states to develop statewide antidegradation policies and identify methods for

[1] United States Environmental Protection Agency, Clean Water Act, 2002.

implementing them.[2] Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods must, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

iii) Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the main federal law that ensures the quality of the Nation's drinking water.[3] The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply and its sources, including rivers, lakes, reservoirs, springs, and groundwater wells. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers that implement those standards. The SDWA regulates contaminants of concern in domestic water supply, including the maximum contaminant levels (MCLs), and that the USEPA has delegated the California Department of Public Health the responsible agency for administering California's drinking water program. MCLs are established under California Code of Regulations (CCR) Title 22, Div. 4, Ch. 15, Article 4 (Title 22 Standards).

iv) National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the Federal Emergency Management Agency (FEMA) to evaluate flood hazards.[4] FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and development practices, by identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies (FIS). Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

The Flood Disaster Protection Act requires owners of all structures within identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally-related financial assistance, such as mortgage loans from federally-insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA.

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2 United States Environmental Protection Agency, Water Quality Standards Handbook - Chapter 4: Antidegradation, 2010.

3 United States Code, Title 42 – The Public Health and Welfare- Chapter 6A Public Health and Service, Safe Drinking Water Act. 2006 Edition, Supplement 4, 2006.

4 The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, 42 U.S.C. 4001 et. seq.

a) State

i) Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control.[5] The California Water Code (CWC) authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. In California, the NPDES stormwater permitting program is administered by the SWRCB.

Under the CWC, the State of California is divided into nine Regional Water Quality Control Boards (RWQCBs), which govern the implementation and enforcement of the CWC and the CWA. The Project Site is located within Region 4, also known as the Los Angeles RWQCB (LARWQCB). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a Water Quality Control Plan or Basin Plan for its region. The Basin Plan establishes beneficial use definitions for the various types of water bodies and serves as the basis for establishing water quality objectives, discharge conditions and prohibitions, and must adhere to the policies set forth in the CWC and established by the SWRCB.

ii) California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB in 1968.[6] Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just surface waters. The policy states that, whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of the water resource.

iii) California Toxics Rule

In 2000, the California Environmental Protection Agency (CalEPA) promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State.[7] CalEPA promulgated this rule based on CalEPA's determination that the numeric criteria of specific concentrations of regulated substances are necessary for the State to protect human health and the environment. The California Toxics Rule establishes acute (i.e.,

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5 State Water Resources Control Board, Porter-Cologne Water Quality Control Act, 2018.

6 California State Water Resources Control Board, State Board Resolution No. 68-16, 1968.

7 United States Environmental Protection Agency, Water Quality Standards, Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California, 2001.

short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

iv) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and to impose fees and assessments. SGMA also allows the State Water Resources Control Board (SWRCB) to intervene if local agencies will not or do not meet the SGMA requirements, in addition to mandating that critically overdraft basins be sustainable by 2040, and medium- or high-priority by 2042.

b) Regional

i) NPDES Permit Program

As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. This NPDES permit, General Permit for Stormwater Discharges from Construction Activities by the SWRCB (Construction General Permit), establishes a risk-based approach to stormwater control requirements for construction projects. The County of Ventura operates under Stormwater Municipal Permit No. CAS004002, issued by the LARWQCB.

For all construction activities disturbing one acre of land or more, California mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of best management practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the Construction General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.[8] The purpose of an SWPPP is to identify potential sources and types of pollutants associated with construction activity and list BMPs that would prohibit pollutants from being discharged from the construction site into the public stormwater system. BMPs typically address stabilization of construction areas, minimization of erosion during construction, sediment control, control of pollutants from construction materials, and post-construction stormwater management (e.g., the minimization of

[8] Construction Stormwater Program, State Water Resources Control Board, October 30, 2019. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.

impervious surfaces or treatment of stormwater runoff). The SWPPP is also required to include a discussion of the proposed program to inspect and maintain all BMPs.

A site-specific SWPPP could include, but not be limited to the, following BMPs:

- Erosion Control BMPs – to protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing areas of disturbance, stabilizing disturbed areas, and protecting slopes/channels. Such BMPs may include, but would not be limited to, use of geotextiles and mats, earth dikes, drainage swales, and slope drains.

- Sediment Control BMPs – are treatment controls that trap soil particles that have been detached by water or wind. Selection of the appropriate sediment control BMPs would be based on keeping sediments on-site and controlling the site boundaries. Such BMPs may include, but would not be limited, to use of silt fences, sediment traps, and sandbag barriers, street sweeping and vacuuming, and storm drain inlet protection.

- Wind Erosion Control BMPs – consist of applying water to prevent or minimize dust nuisance.

- Tracking Control BMPs – consist of preventing or reducing the tracking of sediment off-site by vehicles leaving the construction area. These BMPs include street sweeping and vacuuming. Project sites are required to maintain a stabilized construction entrance to prevent off-site tracking of sediment and debris.

- Non-Stormwater Management BMPs – also referred to as “good housekeeping practices,” involve keeping a clean, orderly construction site.

- Waste Management and Materials Pollution Control BMPs – consist of implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated by a construction project to prevent the release of waste materials into stormwater runoff or discharges through the proper management of construction waste.

The SWRCB adopted a General Permit for Stormwater Discharges from Construction Activities on September 2, 2009, and amended the permit on July 17, 2012 (Order No. 2012-0006-DWQ, General NPDES Permit No. CAS000002). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the appropriate RWQCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction and must prepare a State SWPPP that

incorporates the minimum BMPs required under the permit as well as appropriate project-specific BMPs. The SWPPP must be completed and certified by the developer and BMPs must be implemented prior to the commencement of construction and may require modification during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

ii) Ventura County General Plan

The Water Resources Element of the County's General Plan contains the following applicable policies regarding to preserve and enhance water quality:

WR-2.1 **Identify and Eliminate of Sources of Water Pollution.** The County shall cooperate with Federal, State and local agencies in identifying and eliminating or minimizing all sources of existing and potential point and non-point sources of pollution to ground and surface waters, including leaking fuel tanks, discharges from storm drains, dump sites, sanitary waste systems, parking lots, roadways, and mining operations.

WR-2.2 **Water Quality Protection for Discretionary Development.** The County shall evaluate the potential for discretionary development to cause deposition and discharge of sediment, debris, waste, and other contaminants into surface runoff, drainage systems, surface water bodies, and groundwater. In addition, the County shall evaluate the potential for discretionary development to limit or otherwise impair later reuse or reclamation of wastewater or stormwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.

WR-2.3 **Discretionary Development Subject to CEQA Statement of Overriding Considerations – Water Quality and Quantity.** The County shall require that discretionary development not significantly impact the quality or quantity of water resources within watersheds, groundwater recharge areas or groundwater basins.

WR-3.3 **Low-Impact Development.** The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit.

2. Environmental Setting

The Project Site is currently developed with the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre

Subject Parcels. There are 117 existing structures associated with the camp, totaling approximately 208,000 square feet. Vegetation at the camp consists of mustards, non-native grasses, oak woodlands, sycamore woodlands, sagebrush, and purple sage scrub. Much of the camp area has been cleared or disturbed. Meier Canyon Creek, which is an ephemeral stream that is part of the Arroyo Simi watershed, and the East Tributary of Meier Canyon Creek, bisect the developed portion of the camp.

The Project Site drains towards the south and sheet flows passing existing fields, buildings, and pathways and into the southern Meier Canyon creek. The eastern portion of the site, where the proposed parking lot would be, drains directly south and into the creek. The Project contains approximately 7 acres of site improvements and has an average existing slope of 10.3 percent within the footprint of disturbance. The amount of pervious and impervious areas on the Project Site are summarized in Table IV.K-1. The pre-development drainage at the Project Site is represented by six main watershed areas with several sub-watersheds, the six discharge points that are summarized in Table IV.K-2. The existing hydrologic conditions of the site are shown in Figure IV.K-1.

Table IV.K-1
Existing Pervious/Impervious Areas Summary

Disturbed Areas	Pervious	Impervious
7 acres	6.525 acres	0.475 acres

Source: Drainage Report, Stormwater Quality Analysis, and Low Impact Development, Stantec Consulting Services, Inc., revised August 17, 2023.

Table IV.K-2
Existing Peak Runoff

Discharge Point	Σ Area (acres)	Σ Q10 (CFS)	Σ Q25 (CFS)	Σ Q50 (CFS)	Σ Q100 (CFS)
1	66.09	74.60	96.60	113.30	131.10
2	45.44	52.10	66.60	78.70	94.50
3	18.84	25.00	32.00	39.00	44.70
4	5.73	8.80	12.30	14.10	19.30
5	11.09	13.90	18.70	23.10	26.50
6	36.23	36.50	46.50	57.10	65.90
Total	**183.42**	**210.90**	**272.70**	**325.30**	**382.00**

CFS = cubic feet per second

Source: Drainage Report, Stormwater Quality Analysis, and Low Impact Development, Stantec Consulting Services, Inc., revised August 17, 2023.



Source: Stantec, 2022.

Figure IV.K-1
Existing Condition Hydrology Map

3. Impact Analysis

a) Thresholds of Significance

The analysis of hydrology and water quality impacts considers criteria identified in the CEQA Guidelines Appendix G Environmental Checklist for Hydrology and Water Quality and uses the following significance thresholds from the County's Initial Study Assessment Guidelines (ISAGs) as additional factors to determine significance.

i) ISAGs Water Resources – Groundwater Quality

Threshold of significance criteria for determining if a land use or project activity has the potential to cause a significant adverse impact upon groundwater quality in itself or on a cumulative basis include, but are not limited to:

1. Any land use or project proposal that will individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan shall be considered to have a significant impact.

2. A land use or project shall be considered to have a significant impact on groundwater quality where there is evidence that the proposed land use or project could cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan. This finding of a potential significant groundwater quality impact shall remain until such time as reliable studies determine otherwise.

3. Any land use or project that proposes the use of groundwater in any capacity and is located within two miles of the boundary of a former or current test site for rocket engines.

4. General Plan Goals and Policies - Any project that is inconsistent with any of the policies or development standards relating to groundwater quality of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan (above), may result in a significant environmental impact. This threshold is not applicable if the project includes a General Plan Amendment (GPA) that would eliminate the inconsistency, and the GPA itself would not have a significant impact on groundwater quality or be inconsistent with any groundwater quality policy or development standard of the General Plan or applicable Area Plan (above).

ii) ISAGs Water Resources – Surface Water Quantity

Threshold of significance criteria for determining if a land use or project activity has the potential to cause a significant adverse impact upon surface water quantity in itself or on a cumulative basis include, but are not limited to:

1. Any project that will increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by SWRCB or where

unappropriated surface water is unavailable, shall be considered to have a significant adverse impact on surface water quantity.

2. Any project that will increase surface water consumptive use (demand) including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan per Section B, above, is considered a significant adverse impact.

3. General Plan Goals and Policies - Any project that is inconsistent with any of the policies or development standards relating to surface water quantity of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan (above), may result in a significant environmental impact. This threshold is not applicable if the project includes a General Plan Amendment (GPA) that would eliminate the inconsistency, and the GPA itself would not have a significant impact on surface water quantity or be inconsistent with any surface water quantity policy or development standard of the General Plan or applicable Area Plan (above).

iii) ISAGs Water Resources - Water Supply – Quantity

Threshold of significance criteria for determining if a land use or project activity has the potential to cause a significant adverse impact upon water supply in itself or on a cumulative basis include, but are not limited to projects that:

1. Lack a permanent supply of water.

2. Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that would adversely affect the water supply or quantity of the hydrologic unit in which the project site is located.

iv) ISAGs Water Resources – Surface Water Quality

Threshold of significance criteria for determining if a land use or project activity has the potential to cause a significant adverse impact upon surface water quality individually or cumulatively when combined with recently approved, current, and/or reasonably foreseeable future projects, include, but are not limited to the following:

1. Any land use or project proposal that is expected to individually or cumulatively degrade the quality of Surface Water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans.

2. Any land use or project development that directly or indirectly causes stormwater quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits.

v) ISAGs Hydraulic Hazards – Non-FEMA

Potential erosion/siltation hazards and flooding hazards are ubiquitous throughout Ventura County and are addressed by the Ventura County Public Works Agency-Watershed Protection District's Standards and Specifications Design Manual. I

Erosion/siltation hazards and the effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances, which apply to all sites and projects.

Threshold criteria therefore are determined on a case-by-case basis pursuant to the following documents (individually, collectively, or in combination with one another):

- Ventura County Building Code Ordinance No.4608 (Adopted November 1, 2022)[9]
- Ventura County Land Development Manual
- Ventura County Subdivision Ordinance
- Ventura County Coastal Zoning Ordinance
- Ventura County Non-Coastal Zoning Ordinance
- Ventura County Standard Land Development Specifications
- Ventura County Road Standards
- Ventura County Watershed Protection District Hydrology Manual
- County of Ventura Stormwater Quality Ordinance, Ordinance No. 4142 (Adopted July 22, 1997)
- Ventura County Hillside Erosion Control Ordinance, Ordinance No. 3539 (Adopted April 7, 1981) and Ordinance No. 3683 (Adopted March 20, 1984)
- Ventura County Municipal Storm Water NPDES Permit
- State General Construction Permit
- State General Industrial Permit
- National Pollutant Discharge Elimination System (NPDES)

vi) ISAGs Hydraulic Hazards – FEMA

If the entire development is located outside of the boundaries of a Special Flood Hazard Area and is located entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain), a determination of No project-specific or cumulative Impact (N) will be made under Item 17.a.: Hydraulic Hazards - FEMA in the Initial Study Checklist.

If the entire development is located outside of the boundaries of a Special Flood Hazard Area and is located entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain), a determination of Less Than Significant

[9] Though an updated Ventura County Building Code will take effect on January 1, 2026, the project is currently being plan checked under the 2022 Ventura County Building Code.

project-specific and cumulative Impact (LS) will be made under Item 17.a.: Hydraulic Hazards - FEMA in the Initial Study Checklist.

If the proposed development, in part or in whole, is located within the boundaries of a Special Flood Hazard Area but is located outside of the boundaries of the Regulatory Floodway, a determination of Less Than Significant project-specific and cumulative Impact (LS) will be made. A determination of (LS) will be made if it can be demonstrated that the proposed development can be designed and constructed as part of the Floodplain Development Permit and Building Permit processes in compliance with all applicable floodplain management standards and measures set out in the Threshold Criteria, above.

A determination of Potentially Significant Project-Specific and Cumulative Impact – Mitigation Incorporated (PS-M) will be made when potentially significant impacts from the 1% annual chance flood can be mitigated to a Less Than Significant project-specific and cumulative Impact (LS) level through project design or measures set out in the Threshold Criteria, above, such as but not limited to, relocating the proposed development elsewhere on the property where the risk of flood damage is potentially lower, implementing FEMA-supported building construction and grading technologies that mitigate flood damage and thereby reducing the risk of the flood hazard. Mitigation measures will be developed on a case-by-case basis.

If the proposed development, in part or in whole, is located within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available DFIRMs provided by FEMA, a determination of Potentially Significant project-specific and cumulative Impact (PS) will be made under Item 17.a.: Hydraulic Hazards - FEMA in the Initial Study Checklist. The Threshold Criteria, above, specify that new habitable and non-habitable development will not be allowed within the Regulatory Floodway. Due to this restriction, development cannot be mitigated to either a PS-M or a LS level.

vii) ISAGs Flood Control Facilities/Watercourses – Watershed Protection District

Any project that will, either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards shall be considered to have a potentially significant impact. Specific examples of potentially significant impacts include:

1. Reducing the capacity of flood control facilities and watercourses. This includes the planting of any vegetation within the watercourse or on the banks thereof.

2. Eroding watercourse bed and banks due to high velocities, changes in adjacent land use, encroachments into the channel such as bridges, and loading the top of the channel embankment with structures.

3. Deposition of any material of any kind in a watercourse.

4. Placement of a structure that encroaches on a flood control facility or that does not have sufficient setback from a watercourse.

viii) ISAGs Flood Control Facilities/Water Courses – Other Facilities

The WPD's Comprehensive Plan defines those channels subject to the WPD's regulatory authority. The natural and man-made channels and facilities not under the WPD's authority, and the impacts thereon, are the focus of review under this guidance.

In reviewing a project for impacts, the following are to be given consideration:

- The possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow.
- The capacity of the channel and the potential for overflow during design storm conditions.
- The potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off site.

ix) Appendix G of the CEQA Guidelines

A project could have a significant impact if the project would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv) impede or redirect flood flows.

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

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

b) Project-Specific Impacts

The discussion of Water Supply – Quantity, pursuant to the ISAGs threshold noted above, is included in Section IV.Q.B, Utilities and Service Systems – Water, of this Draft EIR.

Impact HYD-1 **The Project would not violate any water quality standards or waste discharge requirements or otherwise degrade water quality. Therefore, Project impacts related to this topic would be less than significant and no mitigation measures are required.**

During construction of the Project, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff during a rain event. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. The Project would be required to comply with the NPDES General Construction Permit, including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering Meier Canyon Creek (where sheet flow currently drains) during the construction period. In addition, the Project would be subject to the County's Stormwater Ordinance, which provides prohibitions on non-stormwater discharges. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the County's discharge requirements, would ensure that the Project complies with applicable water quality standards and therefore that construction stormwater runoff would not violate water quality and/or discharge requirements.

During Project operation, as discussed below under Impact HYD-3, while the Project would result in an increased impervious area on the Project Site, the increased peak flow would be reduced by the proposed infiltration basins, which would reduce the volume capacities of runoff to below the pre-Project condition. In addition, proposed impervious areas will be treated using low-impact development methods such as infiltration basins and permeable pavers. Compliance with MS4 water quality requirements for the Project is provided by infiltration BMPs at various collection points throughout the Project Site. The treatment facilities will be designed to treat the Stormwater Quality Design Volume and Stormwater Quality Design Flow based on the methodology in the Ventura County Technical Guidance Manual. These methods would positively impact stormwater quality in the area. Therefore, the Project would also not provide additional sources of polluted runoff that could impact any downstream water bodies. As such, the Project would reduce the amount of surface water runoff leaving the Project Site during Project operations as compared with the current conditions. In addition, the implementation of BMPs would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality, and Project impacts related to water quality would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant

Impact HYD-2 **The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Therefore, Project impacts related to this topic would be less than significant, and no mitigation measures are required.**

During a storm event, stormwater runoff currently flows to Meier Canyon Creek. Following redevelopment of the Project Site, runoff would continue to flow to Meier Canyon Creek as well as infiltration basins that would be installed as part of the Project. As discussed in the geotechnical report prepared for the Project Site (included in Appendix E-1 of this Draft EIR), groundwater was encountered in borings excavated to depths of 12 to 14 feet.[10] However, the Project does not include the construction of any subterranean levels and would therefore not require excavation to the depths of groundwater. Additionally, the Project would not use groundwater for any purpose including potable water use. Thus, the Project would not substantially decrease groundwater supplies or otherwise interfere substantially with groundwater recharge. Therefore, this impact would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HYD-3 **The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces that would result in erosion/siltation, flooding, polluted runoff, or impeding flood flows. Therefore, Project impacts related to this topic**

[10] Geologic and Geotechnical Engineering Investigation, GeoSoils Consultants Inc., March 31, 2022, page 5.

would be less than significant, and no mitigation measures are required.

A drainage report was prepared to identify stormwater impacts as a result of the Project (see Appendix H-1 of this Draft EIR). As shown in Table IV.K-3, the post-Project condition would result in an increase in the amount of impervious surfaces at the site when compared to existing conditions. Under the developed condition, runoff from the northerly areas of the site would surface flow towards the south via overland sheet flow. To reduce flow on the Project Site and improve drainage to the overall site, three bypass culverts would be added to collect runoff water from existing upstream watershed areas north of High Road. Two of the proposed culverts would distribute runoff to a daylighted outlet where the flow's velocity would be controlled by a riprap, and runoff would naturally sheet flow into the creek. Another bypass culvert would distribute runoff and discharge into an existing watershed. The Project's proposed drainage is shown in Figure IV.K-2.

Table IV.K-3
Pervious/Impervious Area Summary

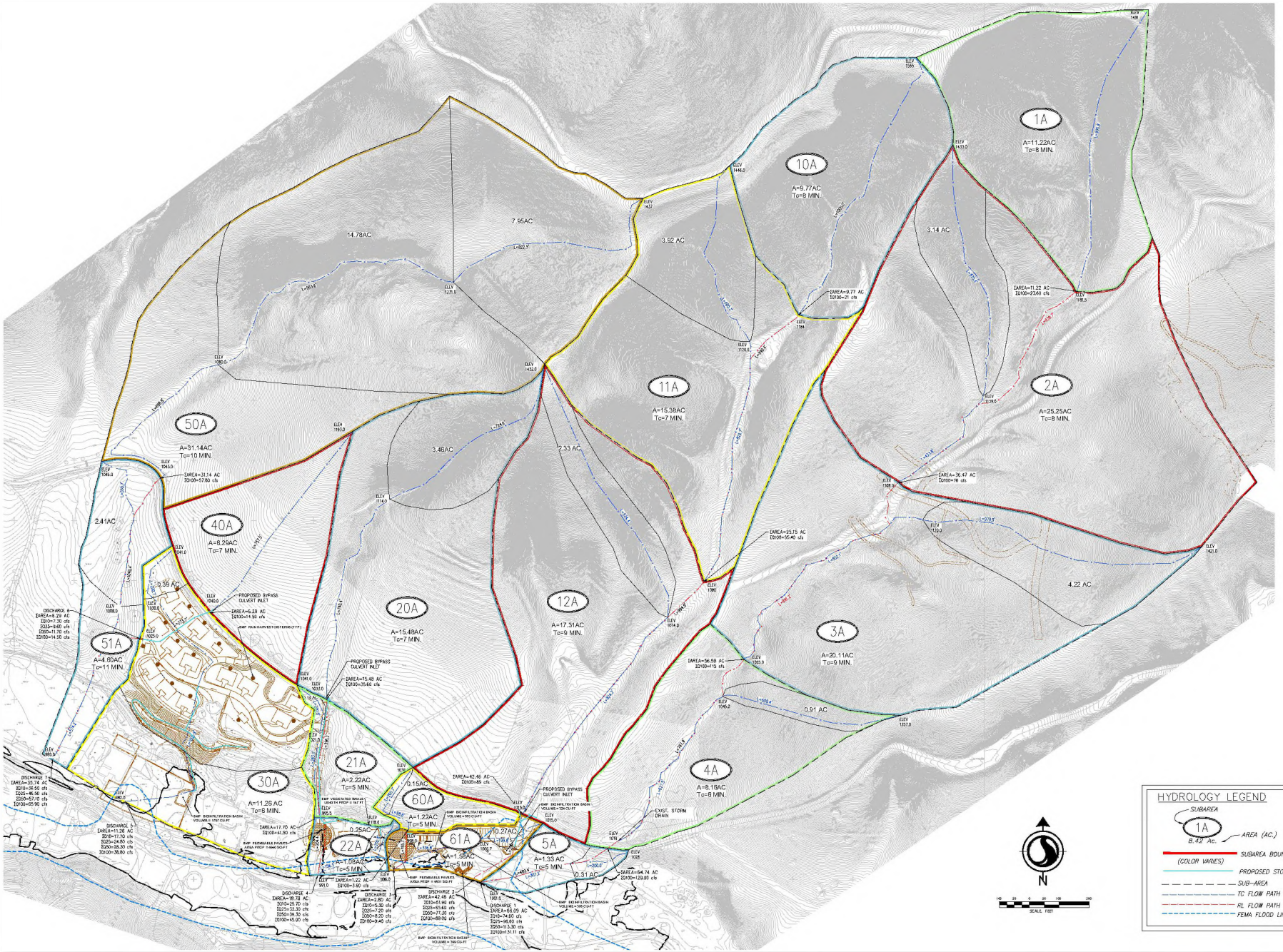
	Disturbed Areas (AC)	Pervious (AC)	Impervious (AC)
Existing	7	6.525	0.475
Proposed	7	4.53	2.47

AC = acres

Source: Drainage Report, Stormwater Quality Analysis, and Low Impact Development, Stantec Consulting Services, Inc., revised August 17, 2023.

The increase of the overall developed runoff peak would be managed by the infiltration basins provided throughout the Project Site. While the Project would result in an increased impervious area on the Project Site, the increased peak flow would be reduced by the proposed infiltration basins, which would reduce the volume capacities of runoff to below the pre-Project condition. Thus, the Project would not result in substantial erosion or siltation on- or off-site or increase the rate or amount of runoff that would result in flooding on- or off-site or create runoff that would exceed the capacity of existing or planned stormwater drainage systems or impede or redirect flood flows.

The post-Project impervious areas would be treated using low-impact development methods such as rain barrels, infiltration basins and permeable pavers. Compliance with MS4 water quality requirements for the Project is provided by infiltration BMPs at various collection points throughout the Project Site. The treatment facilities would be designed to treat the Stormwater Quality Design Volume and Stormwater Quality Design Flow based on the methodology in the Ventura County Technical Guidance Manual. These methods would positively impact stormwater quality in the area. Thus, the Project would also not provide additional sources of polluted runoff.



Source: Stantec, 2022.

Figure IV.K-2
Proposed Condition Hydrology Map

As such, the Project would not substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river or though the additional of impervious surfaces. Therefore, this impact would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HYD-4 The Project would not risk release of pollutants in flood hazard, tsunami, or seiche zones. This impact would be less than significant, and no mitigation measures would be required.

A floodplain study was prepared to evaluate Meier Canyon Creek's 100-year flood hydraulic characteristics and delineate the floodplain boundary under existing and proposed conditions (see Appendix H-2 of this Draft EIR). Meier Canyon Creek is an ephemeral natural stream which runs northwesterly and confluences with Arroyo Simi. The total drainage area of Meier Canyon is approximately 5.9 square miles. The Project includes the addition of a new Welcome Center building and parking lot to the Camp property on the north side of the East Tributary of Meier Canyon Creek.

This floodplain study includes a comparison of the 100-year floodplains in the vicinity of the proposed Welcome Center building and adjacent infrastructure (parking lot and roads) between the existing and proposed conditions, and as summarized in that study, there is expected to be a difference in maximum water surface elevation for the 100-year flood discharge of less than +/- 0.5 foot or less along the East Tributary of Meier Canyon Creek adjacent to the proposed Welcome Center compared to the existing condition (without Welcome Center).

At the locations where there are changes in water surface elevation, the is an expected change of average flow velocity (within the channel) of approximately +/- 1 foot/second, with a maximum value of an increase of 1.3 feet/second just upstream of the proposed Welcome Center. In general, where there was a reduction in flow depth for the proposed conditions, the average flow velocity increased. And where there was an increase in water surface elevation, a reduction in average flow velocity.

Based on the 1D hydraulic model results developed for this analysis, minimal changes in water surface elevation and mean flow velocity for the 100-year flood are expected to occur within the Project Site. The estimated changes in flow depth and average velocity are between a distance of approximately 250 upstream of the proposed Welcome Center to about 300 feet downstream of the Welcome Center along the East Tributary of Meier Canyon Creek.

The maximum 100-year flood water surface elevation at the location of the proposed Welcome Center building is estimated to be approximately 995.0 feet above mean sea level (amsl) (at the upstream, southeast corner of the building footprint). The maximum 100-year flood water surface elevation at the downstream, southwest corner of the building footprint is estimated to be about 992.7 feet amsl. These estimates can be used to select the finished floor elevation for the proposed Welcome Center structure.

However, as discussed above under Impact HYD-3, the proposed infiltration methods would positively impact stormwater quality in the area. Thus, the Project would not result in the risk of release of pollutants in a flood hazard area.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. The Project Site is located approximately 15 miles from the Pacific Ocean and is not within the path of other bodies of water such as a reservoir. Thus, the Project would not result in the risk of release of pollutants in a tsunami or seiche zone.

The Project would not risk release of pollutants in flood hazard, tsunami, or seiche zones, and therefore, this impact would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact HYD-5 **The Project would not conflict with or obstruct implementation of a water quality control plan or groundwater management plan. Impacts related to this issue would be less than significant and no mitigation measures are required.**

The Project is within the jurisdiction of the LARWQCB, and grading and other construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. However, compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with Standard Urban Stormwater Management Project (SUSMP) requirements. Compliance with these regulations would ensure that impacts with respect to a water quality control plan are less than significant.

As discussed in the geotechnical report prepared for the Project Site (refer to Appendix E-1 of this Draft EIR), groundwater was encountered in borings excavated to depths of 12 to 14 feet.[11] However, the Project does not include the construction of any subterranean levels and would not require excavation to the depths of groundwater. Thus, the Project would not conflict with or obstruct implementation of a groundwater management plan. Therefore, this impact would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

Due to the site-specific nature of hydrology conditions (i.e., drainage, subsurface features, groundwater), hydrology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. With the exception of the cases associated with the Project Site itself, none of the related projects are in close enough proximity to the Project such that they would result in cumulative impacts to hydrology and water quality. As discussed above, the Project would reduce the amount of runoff leaving the Project Site and would positively impact stormwater quality in the area. Like the Project, the related projects would also be required to adhere to regulatory requirements that control storm water and pollutant discharges. As such, it is possible that future development would improve the quality of water draining from the area as water quality features for the related sites are implemented as requirements of project development.

As discussed above, the Project would not result in any significant hydrology or water quality impacts. Similarly, taken together with the related projects, the Project would not create an impact that is cumulatively considerable because each related development project would have to comply with site-specific development standards and state water quality regulations. Compliance with these standards would ensure that the related projects would further the objectives of applicable regional water quality plans. Therefore, cumulative impacts to hydrology and water quality would not be cumulatively considerable.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

[11] Ibid.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.L NOISE

This section of the Draft EIR analyzes potential noise and vibration impacts of the Project. Included in this section is a description of the existing noise environment within the Project Site area, an estimation of future noise and vibration levels at surrounding sensitive land uses associated with construction and operation of the Project, a description of the potential significant impacts, and the inclusion of mitigation measures to address any identified potential significant impacts. Additionally, this section of the Draft EIR evaluates the Project's incremental contribution to potential cumulative noise and vibration impacts resulting from past, present, and probable future projects.

1. Fundamentals of Noise and Vibration

a) Noise

i) Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. Table IV.L-1 provides examples of A-weighted noise levels from common sources.

A. Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}) and the Community Noise Equivalent Level (CNEL).

- Equivalent Noise Level (L_{eq}): L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

- Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

Table IV.L-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. *These noise levels are approximations intended for general reference and informational use.*	

- Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

B. Effects of Noise

The degree to which noise can impact an environment can range from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[1] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[2]

[1] National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

[2] World Health Organization, Guidelines for Community Noise, 1999.

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.[3] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.[4] However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.[5]

C. Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.[6] The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

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3 Ibid.

4 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

5 World Health Organization, Guidelines for Community Noise, 1999.

6 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

b) Vibration

i) Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

A. Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[7] This analysis also discusses the vibration of events in decibel scale, known as Vibration Decibels (VdB), which is a unitless measure of vibration that is expressed on a logarithmic scale.

B. Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that can disrupt concentration or disturb sleep. Groundborne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

C. Perceptible Vibration Changes

Unlike noise, groundborne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.[8] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

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7 California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020; https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

8 Ibid.

2. Regulatory Framework

a) Noise

i) Federal

No federal noise standards regulate environmental noise associated with short-term construction activities or long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated or evaluated by State and County of Ventura standards designed to protect public well-being and health.

ii) State

The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table IV.L-2 illustrates State compatibility considerations between land uses and exterior noise levels.

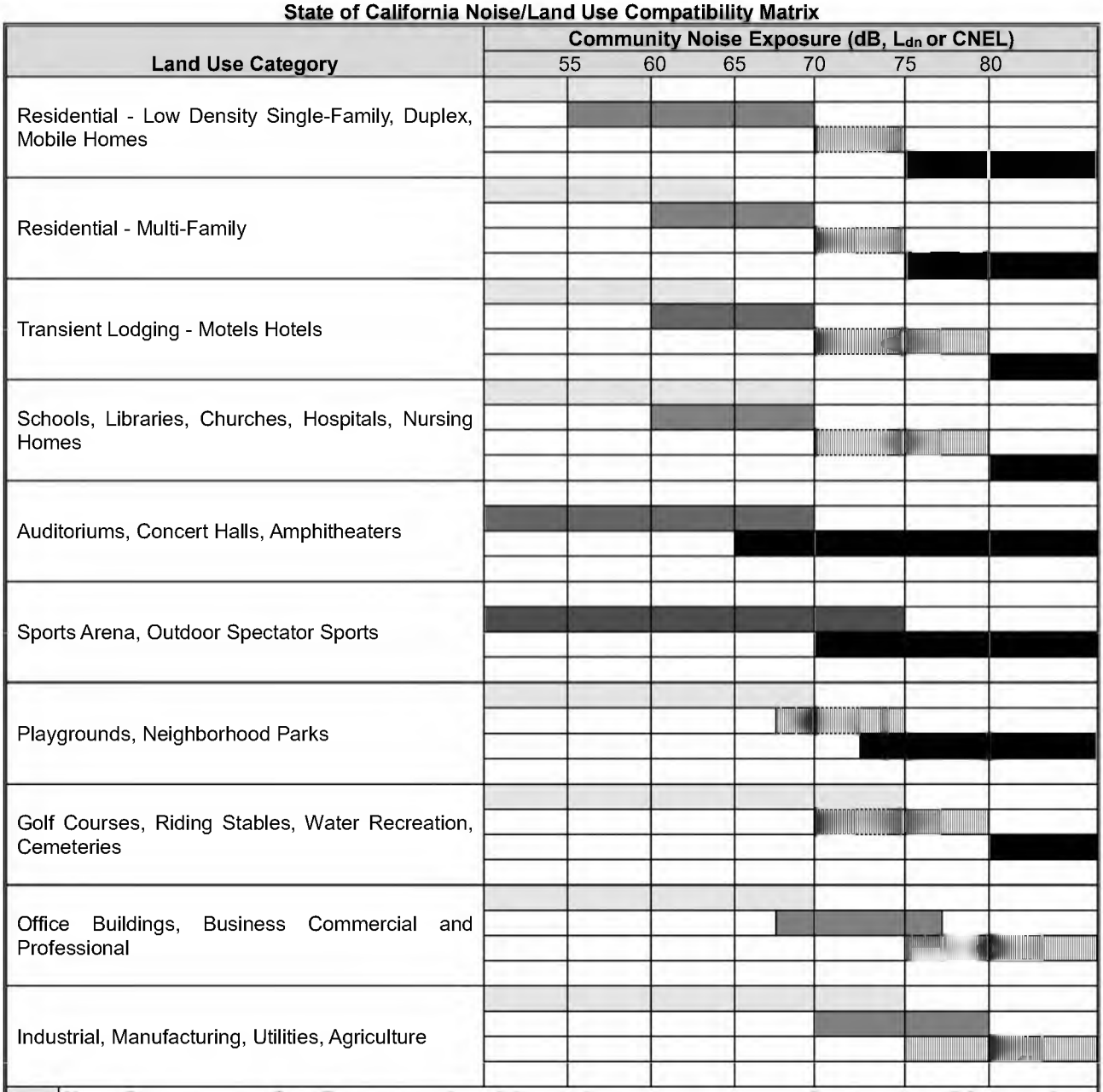
California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize State noise control guidelines, and analyze and quantify current and projected noise levels.

iii) County of Ventura

A. General Plan

The County of Ventura 2040 General Plan includes a Hazards and Safety Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts. However, the Hazards and Safety Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in Table IV.L-2, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Table IV.L-2
State of California Noise/Land Use Compatibility Matrix



Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.

The Hazards and Safety Element includes Goal HAZ-9 "[t]o protect the health, safety, and general welfare of county residents by striving to eliminate or avoid the adverse noise impacts on existing and future noise sensitive uses." It includes several relevant noise policies, including:

- **HAZ-9.1 (Limiting Unwanted Noise)**. The County shall prohibit discretionary development which would be impacted by noise or generate project-related noise which cannot be reduced to meet the standards prescribed in Policy Haz-9.2. This policy does not apply to noise generated during the construction phase of a project.

- **HAZ-9.2 (Noise Compatibility Standards)**. The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:

    1. New 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 indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or L_{eq1H} of 65 dB(A) during any hour.

    2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A)]

    3. New noise sensitive uses proposed to be located near airports:

        a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or

        b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less.

    4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:

        a. L_{eq1H} of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;

        b. L_{eq1H} of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and

c. L_{eq1H} of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.

5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005). The guidance document provided guidance on how to perform noise exposure analyses, generally establishing that elevating daytime, evening, or nighttime noise levels during construction by 3 dB $L_{eq(h)}$ would be considered significant at residential receptors. It also noted that projects must be prepared to respond to complaints of construction noise and remedy them in a timely manner.

- **HAZ-9.3 (Development Along Travel Routes)**. The County shall evaluate discretionary development for noise generated by project-related traffic along the travel route to the nearest intersection which allows for movement of traffic in multiple directions. In all cases, the evaluation of project-related roadway noise shall be evaluated along the travel route(s) within 1,600 feet of the project site.

- **HAZ-9.4 (Acoustical Analysis Required)**. The County shall require an acoustical analysis by a qualified acoustical engineer for discretionary development involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors and shall recommend noise control measures for mitigating adverse impacts.

- **HAZ-9.5 (Site and Building Design)**. The County shall require discretionary development and County-initiated projects to comply with adopted noise standards through proper site and building design features, such as building location and orientation, setbacks, natural barriers and vegetation, and building construction. The County shall only consider sound walls if noise mitigation measures have been evaluated or integrated into the project and found infeasible.

- **HAZ-9.7 (Noise Control Priorities)**. The priorities for noise control for discretionary development shall be as follows:

    - Reduction of noise emissions at the source.

    - Attenuation of sound transmission along its path, using barriers, landform modification, dense plantings, building orientation and placement, and the like.

    - Rejection of noise at the reception point using noise control building construction, hearing protection or other means.

- **HAZ-9.8 (Implement Noise Control Measures for Traffic Noise)**. The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist:

    - The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ 9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or,

    - The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ 9.2. Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fair-share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible1 noise reduction measures shall be implemented to ensure the development's fair-share of traffic-generated noise is reduced, consistent with Policy HAZ 9.2.

A. County of Ventura Municipal Code

Article 11 of the County's Code of Ordinances prohibits loud or raucous noise within any residential zone which is audible to the human ear during the hours of 9 P.M. to 7 A.M. at a distance of 50 feet from the property line of the noise source or 50 feet from any such noise source if the source is in a public right-of-way. While the ordinance indicates that "loud or raucous noise" can include operation of riding tractors or other mechanical or electrical devices or hand tools, which could be used during construction activities, Section 6299-2(a) exempts any government entity or public utility from the provisions of the ordinance.

b) Vibration

i) Federal

A. Federal Transit Administration (FTA)

In 2018, the FTA published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table IV.L-3 summarizes FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

Table IV.L-3
FTA Vibration Damage Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.	

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

b) State

California's Civil Code Section 832 protects adjacent properties when excavation of a site occurs.

> *Each coterminous owner is entitled to the lateral and subjacent support which his land receives from the adjoining land, subject to the right of the owner of the adjoining land to make proper and usual excavations on the same for purposes of construction or improvement, under the following conditions:*
>
> *1. Any owner of land or his lessee intending to make or to permit an excavation shall give reasonable notice to the owner or owners of adjoining lands and of buildings or other structures, stating the depth to which such excavation is intended to be made, and when the excavating will begin.*
>
> *2. In making any excavation, ordinary care and skill shall be used, and reasonable precautions taken to sustain the adjoining land as such, without regard to any building or other structure which may be thereon, and there shall be no liability for damage done to any such building or other structure by reason of the excavation, except as otherwise provided or allowed by law.*
>
> *3. If at any time it appears that the excavation is to be of a greater depth than are the walls or foundations of any adjoining building or other structure, and is to be so close as to endanger the building or other structure in any way, then the owner of the building or other structure must be allowed at least 30 days, if he so desires, in which to take measures to protect the same from any damage, or in which to extend the foundations thereof, and he*

must be given for the same purposes reasonable license to enter on the land on which the excavation is to be or is being made.

4. If the excavation is intended to be or is deeper than the standard depth of foundations, which depth is defined to be a depth of nine feet below the adjacent curb level, at the point where the joint property line intersects the curb and if on the land of the coterminous owner there is any building or other structure the wall or foundation of which goes to standard depth or deeper then the owner of the land on which the excavation is being made shall, if given the necessary license to enter on the adjoining land, protect the said adjoining land and any such building or other structure thereon without cost to the owner thereof, from any damage by reason of the excavation, and shall be liable to the owner of such property for any such damage, excepting only for minor settlement cracks in buildings or other structures.

California Building Code (CBC) Section 3307 provides additional protection of adjoining property from damage during construction, remodeling, and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights, and roofs.

Caltrans has identified building damage significance guidance that provides thresholds for different categories of structures, including historic buildings that may not be considered extremely fragile (refer to Table IV.L-4).

Table IV.L-4
Caltrans Vibration Damage Potential Threshold Criteria

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/ Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013. Transient noise is that whose average properties do not remain constant over time and are considered extremely short in duration (e.g., single gunshot)		

County of Ventura

The County of Ventura's Initial Study and Assessment Guidelines state that projects that, either individually or cumulatively, include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the thresholds established in

Section 12.2 of the FTA's (2018) Transit Noise and Vibration Impact Assessment would result in a potentially significant impact.

3. Existing Conditions

a) Noise

i) Noise Sensitive Receptors

The Project Site is located in a rural area in a valley south of Simi Valley. As such, there are no sensitive receptors within a mile of the boundaries of the Project Site. The nearest sensitive receptors, residences in Simi Valley along Hi Drive and other residential streets are about one mile north of the Project Site.

ii) Existing Ambient Noise Levels

The 2,558-acre campus is home to the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Project Site. There are 117 structures associated with the camp totaling 208,000 square feet. Overall, noise from outdoor activities include human voices and amplified sounds and music in service to the camp activities.

There is also intermittent noise from the operation of parking lots serving the camp facilities and worker residences, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. There is also infrequent noise from occasional solid waste management and collection activities as well as landscaping activities that are of short duration, as is occasional loading of goods.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[9] Primary access from Simi Valley to the north is via Tapo Canyon Road, which is projected to have traffic noise levels of 52.8 dBA CNEL. South of Bennett Road at 50 feet of distance from the roadway.[10] This 24-hour CNEL noise level is generally considered "Normally Acceptable" for the types of land uses near the Project Site. During summer camps, the presence of 400 campers, as well as support staff, can generate about 651 daily vehicle trips that use Peppertree Lane to access the facilities.[11]

Six structures totaling 11,322 square feet occupy the portion of the campus that would be demolished. This includes three trailers used for staff housing, two cottages used for staff housing,

[9] World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.

[10] County of Ventura, General Plan Hazards and Safety Element, Table 7-1.

[11] Stantec, American Jewish University Camp Expansion – Traffic Impact Study; July 6, 2023.

and a detached garage. These buildings have minor sources of operational noise. These include roof-top units providing air conditioning that occasionally generate minor levels of noise (approximately 81.9 dBA at one foot of distance).[12] These also include non-ducted air conditioners that are wall- or window-mounted units that can produce about 50 dB of sound pressure at three feet of distance, depending on the model and the cooling capacity.[13]

b) Vibration

i) Existing Ambient Vibration Levels

The 2,558-acre campus is home to the American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Subject Parcels. There are 117 structures associated with the camp totaling 208,000 square feet. During summer camps, the presence of 400 campers, as well as support staff, can generate about 651 daily vehicle trips.[14] None of these facilities or associated activities involve use of heavy machinery or equipment that is capable of generating groundborne vibration.

Within the campus, six structures totaling 11,322 square feet occupy the portion of the campus that would be demolished. This includes three trailers used for staff housing, two cottages used for staff housing, and a detached garage. None of these buildings are a source of groundborne vibration.

The primary source of groundborne vibration near the Project Site is vehicle travel. For example, Tapo Canyon Road carries about 888 vehicles south of Royal Avenue in the morning peak hour of traffic.[15] The blend of passenger vehicles, trucks, delivery trucks, transit buses, and other light-, medium-, and heavy-duty vehicles generate minimal levels of vibration. As noted by federal guidance, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible…"[16] As such, vehicle movement generates imperceptible ground vibration, with the occasional exception of heavy-duty vehicles that travel over speed bumps, potholes, and other street irregularities.

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[12] City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.

[13] Air Conditioning Systems website https://www.airconditioning-systems.com/air-conditioner-noise.html. Included sound pressure specifications for four wall-mounted inverter single split systems: Indoor MSY-GE10VA (21-36 dBA), outdoor MUY-GE10VA (46 dBA), Indoor MSY-GE24VA (37-45 dBA) and Outdoor MUY-GE24VA (55 dBA).

[14] Stantec, American Jewish University Camp Expansion – Traffic Impact Study; July 6, 2023.

[15] Ibid. Assumes an 8 percent K-factor to represent A.M. peak-hour traffic volumes.

[16] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

4. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

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

b) Generate excessive groundborne vibration or groundborne noise levels; or

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

b) Project-Specific Impacts

Impact NOISE-1: **The Project would not generate construction or operational noise in excess of applicable significance thresholds. Thus, the Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, Project impacts related to this issue would be less than significant.**

Construction

On-Site Construction Activities

Construction would generate noise during the construction process that would span 22 months of demolition, site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings, as shown in Table IV.L-5.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

Table IV.L-5
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of six structures totaling 11,154 square feet of building floor area hauled twenty miles to landfill in 14-cubic yard capacity trucks.
Site Preparation	Month 2	Grubbing and removal of trees, plants, landscaping, weeds
Grading	Months 3-4	Fine grading of the site, with 67,600 cubic yards of total cut and 67,600 cubic yards of total fill.
Trenching	Months 5-10	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 11-22	Foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 11	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 20-22	Application of interior and exterior coatings and sealants.

Source: DKA Planning, 2025.

During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally lesser because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would often be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Because of the Project's remote location over one mile from the nearest sensitive receptors on Hi Drive and other residential streets in Simi Valley to the northwest, all on-site construction noise impacts would be negligible. The significant distance, soft ground, and intervening structures and terrain would completely attenuate any sound path. Given the limited sound power of construction activities and the negligible exposure to construction noise for residences in Simi Valley to the north, construction activities would not significantly elevate ambient noise in excess of significance threshold in the Construction Noise Threshold Criteria and Control Plan, which establishes that elevating daytime, evening, or nighttime noise levels during construction by 3 dB $L_{eq(h)}$ would be considered significant at residential receptors. As such, on-site construction activities would not significantly impact sensitive receptors.

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate noise equivalent of up to an estimated 37 peak-hour passenger-car-equivalency (PCE) trips, as summarized in Table IV.L-6, during the

construction phase.[17] This would represent about 4.1 percent of traffic volumes on Tapo Canyon Road and Peppertree Lane, which carries about 888 vehicles south of Royal Avenue in the morning peak hour of traffic.[18]

Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Tapo Canyon Road and Peppertree Lane, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, let alone the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

Table IV.L-6
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Tapo Canyon Rd.
Demolition	15	0	1	16	1.8
Site Preparation	18	0	0	18	2.0
Grading	20	0	0	20	2.3
Trenching	3	0	0	3	0.3
Building Construction	22	15	0	37	4.1
Paving	15	0	0	15	1.7
Architectural Coating	4	0	0	4	0.5

Note: Construction vehicle trips assume a passenger car equivalency (PCE) of 19.1 for purposes of estimating traffic-related noise.

Source: DKA Planning, 2024.

Operation

On-Site Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structures themselves or from activity in outdoor spaces.

[17] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

[18] Stantec, American Jewish University Camp Expansion – Traffic Impact Study; July 6, 2023. Assumes an 8 percent K-factor to represent peak A.M. hour traffic volumes.

Mechanical Equipment

The Project would operate mechanical equipment for the Welcome Center, Camper Cabins, Head Counselor Cabins, and Arts Pavilion that would generate incremental long-term noise impacts. This could include the use of typical HVAC equipment for cooling or heat pumps for cooling and heating. Noise from heat pumps and air conditioners is a function of the model, airflow, and pressure flow generated by fans and compressors. Most modern heat pumps are relatively quiet, with sound ratings of up to 60 decibels, equivalent to normal human conversation, while other HVAC units could have a sound power of up to 76 dBA.[19]

Because of the Project's remote location over one mile from the nearest sensitive receptors in Simi Valley to the northwest, all on-site operational noise impacts from mechanical equipment would be negligible. The significant distance, soft ground, and intervening structures and terrain would completely attenuate any sound path. As such, on-site operational noise from mechanical equipment would not significantly impact sensitive receptors.

Parking-Related Activities

The majority of auto-related noise impacts at the Project Site would come from vehicles entering and exiting the development largely from Tapo Canyon Road. The new 58-space parking lot next to the Welcome Center would result in incremental noise impacts. Parking-related noise would include also include door slamming (generally instantaneous) and car alarms, while could last a few seconds. Because of the Project's remote location over one mile from the nearest sensitive receptors in Simi Valley to the northwest, all on-site operational noise impacts from parking would be negligible. The significant distance, soft ground, and intervening structures and terrain would completely attenuate any sound path. As such, on-site operational noise from parking and other auto-related activities would not significantly impact any sensitive receptors.

Outdoor Uses

While most operations would be conducted inside the Welcome Center, Camper Cabins, Head Counselor Cabins, and Arts Pavilion, outdoor activities could generate noise. This would include human conversation, recreation, events, trash collection, landscape maintenance, and commercial loading. These are discussed below.

- Recreation. The addition of up to 100 additional campers will increase noise from outdoor activities and recreation during daytime hours.

- Events. The Project would also result in an increase in the number of special events as well as the number of attendees at certain events. Any use of any amplified speakers would also produce intermittent noise during discrete activities. As is currently the case with the existing facilities, most amplified sounds would be set for

[19] Clean British Columbia. Heat Pumps and Noise. https://vancouver.ca/files/cov/heat-pump-noise-guide.pdf

audibility, and the sound power of these noise events would be marginally louder than background noise levels and any human talking. Increasing the frequency of events or the number of attendees at such events would not constitute a significant noise impact, as each event would produce negligible exposure for sensitive receptors one mile to the north.

- Trash collection. On-site trash and recyclable materials for the facility would continue on-site, with intermittent collection. While more solid waste would be generated with the additional student and teacher populations, impacts would be comparable to existing activities.

- Landscape maintenance. Landscaping for the 110 new trees could generate intermittent noise on the east side of the East Tributary of Meier Canyon Creek. While more landscape maintenance would be generated with the additional plantings, impacts would be comparable to existing activities.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant.

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add up to 535 net vehicle trips to Tapo Canyon Road south of Royal Avenue on a peak weekday at the start of operations in 2027. These activities would generate an estimated 43 peak hourly trips, as summarized in Table IV.L-6, during the construction phase.[20]

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four-hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

[20] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact NOISE-2: No buildings susceptible to vibration damage are located near the Project Site. Thus, the Project would not generate excessive groundborne vibration or groundborne noise levels. Therefore, Project impacts related to this issue would be less than significant.

Construction

Building Damage Vibration Impact – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table IV.L-7 summarizes vibratory levels for common construction equipment.

Table IV.L-7
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project site. However, because of the Project's remote location over one mile from the nearest receptors in Simi Valley to the northwest, there are no off-site structures that would be impacted by on-site construction activities.

Building Damage Vibration Impact – Off-Site Sources

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[21] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's anticipated haul route on Tapo Canyon Road that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, the Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would be considered less than significant.

Operation

During operation of the expanded Camp Alonim facility, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact NOISE-3: The Project Site is not located within two miles of an airport. Thus, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

The Project Site is located about 12.8 miles west of the Van Nuys Airport and is not located within the Airport's Planning Boundary/Airport Influence Area or within the Airport Land Use Plan's 65 dBA CNEL Noise Contour. As such, the Project would not expose residents to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

[21] Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

With the exception of the cases associated with the Project Site itself, no related projects have been identified in the vicinity of the Project or its surrounding receptors, and the related projects are all located more than 1,000 feet away from the Project Site. Therefore, the related projects would not contribute substantially to cumulative noise impacts at receptors near the Project Site during short-term construction or long-term operational activities. As a result, the Project's potential to contribute to any noise or vibration-related cumulative impacts would be considered less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to noise and vibration would be less than significant.

IV.M PUBLIC SERVICES

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire and police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing facilities in the vicinity of the Project Site. The analysis considers whether the Project's demands for fire and police protection services would create the need for new or expanded facilities. The analysis provided in this section is based in part on the following sources, which are included as Appendices L-1 and L-2 of this Draft EIR:

L-1 Brandeis-Bardin Campus, American Jewish University, Emergency Preparedness and Procedures, Summer 2025.

L-2 Collaboration and Review of Emergency Procedures Plan for Brandeis-Bardin Campus, July 1, 2025.

A. FIRE PROTECTION SERVICES

1. Regulatory Setting

a) State

i) California Fire Code

The California Fire Code (CFC), contained in Title 24, Part 9 of the California Code of Regulations, establishes statewide regulations for fire prevention, protection of life and property, and emergency response. Developed by the State Fire Marshal and adopted by the California Building Standards Commission, the CFC incorporates the International Fire Code with California-specific amendments to address the state's unique fire risks, including wildland-urban interface conditions. The code governs requirements for fire protection systems, fire department access, water supplies, hazardous material storage and use, defensible space, and means of egress to ensure that buildings, sites, and operations minimize fire hazards. Enforcement is carried out by local fire authorities, who issue permits, conduct inspections, and oversee compliance. Together, these provisions provide a comprehensive framework to safeguard occupants, first responders, and communities from fire and related hazards.

ii) California Fire Service and Rescue Emergency Aid System

The California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[1] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State

[1] Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.

levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.

b) Local

i) Ventura County Building Code

The Ventura County Building Code (VCBC) is Ventura County's locally adopted version of the State's building regulations. It formally incorporates by reference the California Building Standards Code (Title 24), including the most recent editions (on a triennial cycle), and overlays local amendments to address conditions specific to Ventura County. These amendments typically cover areas like fire zones (wildfire risk and ember exposure), construction requirements, and other climate, safety, and environmental concerns aligned with the County's General Plan and state law. The County adopts its updated VCBC every three years in concert with new State code editions. For instance, Ventura County is preparing to adopt the 2025 California Building Standards Code with local amendments effective January 1, 2026.

ii) Ventura County Fire Code

The Ventura County Fire Code, adopted via Ventura County Fire Protection District Ordinance No. 32, formally references and adopts the 2022 California Fire Code together with specified appendices and portions of the 2021 International Fire Code, plus portions of Title 19 of the California Code of Regulations.[2] Because of Ventura County's local climatic, topographic, and wildfire risk conditions, the County includes more restrictive amendments than the State Code in certain areas, particularly regarding fire protection systems, fire apparatus access, wildland-urban interface (WUI) requirements, defensible space, fuel modification and vegetation management, emergency power for fire water systems, and requirements for new construction and additions in fire hazard zones. These local amendments are enabled by the State Health & Safety Code, which allows jurisdictions to impose stricter standards when reasonably necessary. The adopted Ventura County Fire Code took effect January 1, 2023, aligning with the State's triennial code update cycle.

iii) Ventura County Local Hazard Mitigation Plan

The Ventura County 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) is a comprehensive, FEMA-approved strategy adopted by the County Board of Supervisors on July 12, 2022, and approved by FEMA on August 16, 2022, that seeks to reduce risks from natural hazards across all unincorporated areas, the ten incorporated cities, and multiple special districts in Ventura County. The MJHMP updates the earlier (2015) mitigation plan, inventories and profiles

[2] Although Ventura County Fire Protection District has since adopted Ordinance No. 34, which adopts by reference the 2025 California Fire Code, effective January 1, 2026, the Project is currently subject to the 2022 code.

major hazards (including wildfire, earthquake, flood, dam failure, landslide, severe storms, drought, sea-level rise/coastal erosion, tsunami, etc.), assesses vulnerabilities for people, property, infrastructure, and critical services, and ranks the hazards to inform priorities. It sets out a vision, goals, objectives, and a detailed mitigation action plan comprising both area-wide and jurisdictional-specific measures (over 300 mitigation actions) to guide future investments, policy updates, infrastructure improvements, and emergency response. Finally, the MJHMP helps jurisdictions remain eligible for federal mitigation grant funding by meeting the requirements under the Disaster Mitigation Act of 2000.

2. Environmental Setting

a) Existing Conditions

The Ventura County Fire Department (VCFD) was created in 1928. Originally formed to serve the unincorporated county, it now provides fire protection services to the unincorporated areas of the county and 6 of the 10 incorporated cities: Thousand Oaks, Simi Valley, Moorpark, Camarillo, Port Hueneme, and Ojai. VCFD response area covers 848 square miles, out of the 1,843 total square miles that make up the county and serves a population of more than 480,000.

VCFD provides a range of programs and services aimed at protecting lives and property of the people of Ventura County from the adverse effects of fires, sudden medical emergencies, exposure to hazardous materials, or other dangerous conditions. These programs include fire protection planning, fire prevention education, fire law and code enforcement, fire suppression and recovery, first responder level emergency medical services, and assistance and support for other non-fire emergencies such as floods, earthquakes, and other disasters.

The County of Ventura Board of Supervisors acts as the Board of Directors for VCFD. The Fire Chief is appointed by the Supervisors. VCFD is divided into five bureaus: Administrative Services, Business Services, Support Services, Emergency Services, and Fire Prevention. VCFD includes five Battalions and several specialized units. Battalion 4 primarily serves within the cities of Moorpark and Simi Valley, including the Project Site. The stations in Battalion 4 include 40, 41, 42, 43, 44, 45, 46, and 47.

Each fire station has a staffed fire engine; strategic stations (Stations 30, 41 and 54) also have a staffed fire truck, with specific tools to perform responsibilities including forcible entry, search and rescue, clearing smoke and gas from a building, and turning off utility services.

VCFD specialized units include personnel trained for incidents involving special hazards or needs and they are available to all Battalions. These units include:

- Crash/Rescue Unit: responds to crashes involving flammable liquids.
- Hazardous Materials Unit: responds to incidents involving hazardous substances; they also perform decontamination of victims and emergency personnel.
- Urban Search & Rescue Unit: responds to technical rescue incidents such as those with collapsed structures or when entrapment exceeds the capabilities of regular rescue crews.

- Water Rescue Unit: responds to incidents that exceed the capabilities of land-based units, in swift water, ocean, or lake rescue.
- Wildland/Aviation Unit: responds to wildfire with construction of fire control lines; the unit also works with the Sheriff's Aviation unit.

The fire stations closest to the Project Site include Fire Station 41 located approximately 3.2 miles northwest of the Project Site, and Fire Station 46, located approximately 3.9 miles northwest of the site.

b) Project Site Conditions

The camp maintains an Emergency Preparedness and Procedures Plan, updated annually, that provides procedures to be followed in the event of different types of emergencies. The current plan, for summer 2025, is included in Appendix L-1 of this Draft EIR. As detailed in this plan, the camp maintains procedures in the event of a fire, including the following:

- All staff and campers are to gather on Terry Field. If Terry Field is inaccessible, the alternate location is Gan Field, followed by the Alonim Dance Pavilion.
- Should a camp-wide evacuation be necessary, all campers and stuff would be evacuated by bus to the Rancho Santa Susana Recreation Center in Simi Valley.
- In addition, should the Fire Department order the camp to shelter in place, all campers and staff would gather at Terry Field.

The 2025 Emergency Response and Procedures Plan was reviewed by Michael W. Dyer, a retired Santa Barbara County Fire Chief and National Fire Protection Association (NFPA) Mitigation Specialist (see letter included in Appendix L-2 of this Draft EIR). As discussed therein, he reviewed the plan and provided input to ensure that the plan incorporates best practices and addresses specific considerations related to the camp's location and operational needs.

Refer also to Section IV.R, Wildfire, of this Draft EIR for additional discussion about impacts with respect to wildfires.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.

b) Project-Specific Impacts

Impact FIRE-1 **The Project would be required to continue to comply with the following VCFD Fire Prevention Standards and Guidelines and a VCFD review and would also incorporate measures required by VCFD. Through compliance with existing regulations, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, Project impacts related to fire protection services would be less than significant.**

The Project includes expansion of an existing recreational camp facility. Six existing buildings would be demolished to make way, in part, for the development of a welcome center, 16 new counselor and camper cabins, an arts pavilion, parking lot, and new trails and landscaping. Additionally, the Project would increase the maximum number of campers from 472 to 572 and would increase the frequency of events.

The Project would be required to continue to comply with the VCFD Fire Prevention Standards and Guidelines.

Also, the Project Applicant would be required to submit Project plans to the VCFD for review to ensure compliance with all applicable fire code, standards, and guidelines. The VCFD has conducted a preliminary review of the Project plans requires site improvements based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure MM-FIRE-1 provided below. Through compliance with existing regulations, as well as the implementation of Mitigation Measure MM-FIRE-1, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, Project impacts related to fire protection services would be less than significant.

Mitigation Measures

MM-FIRE-1 Site Improvements to Mitigate Fire Risk

Purpose: To minimize risk to the Project as a result of a fire.

Requirement: The Project shall incorporate the following site improvements:

- All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge.
- Electric gates shall be retrofitted with an auto-exit loop sensor.

- Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet).
- All existing buildings shall be required to meet the following defensible space standards:
  - Zone 0 (5-foot non-combustible zone).
  - Extended fuel reduction/thinning zones to 200 feet from buildings.
- The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.

Documentation: The improvements required by this measure shall be depicted on a site plan.

Timing: The site plan showing the site improvements required by this measure shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the site plan showing the site improvements required by this measure to the Planning Division and the Ventura County Fire Department for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the site plan provided by the Permittee in the Project file.

Level of Significance After Mitigation

With implementation of Mitigation Measure MM-FIRE-1, Project impacts would be less than significant.

c) Cumulative Impacts

Implementation of the Project in conjunction with the related projects could potentially increase demand for fire protection services. On-going development requires the County to continually evaluate the need for new or physically altered fire protection facilities to maintain adequate service ratios. Similar to the Project, each of the related projects would be required to comply with the applicable fire and safety requirements to minimize the potential for fires to occur and to minimize the need for new or physically altered fire protection services. Furthermore, the increased demands for additional fire facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to fire and police protection services would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

B. SHERIFF PROTECTION SERVICES

1. Environmental Setting

a) Existing Conditions

i) Ventura County Sheriff's Office

The Sheriff's Office has been responsible for the security and safety of Ventura County residents and their property since 1873. The Sheriff's Office oversees the county jail system and the investigation of all criminal activities occurring in the unincorporated areas. Beyond providing law enforcement services to the unincorporated county, the Sheriff's Office is also contracted to provide services to five of the county's ten incorporated cities (Thousand Oaks, Camarillo, Moorpark, Fillmore, and Ojai). The unincorporated county and these cities make up 95 percent of the county's land area and are home to nearly half of the county's population.

The Sheriff's Office employs 1,200 staff members, including more than 700 sworn positions. The Sheriff's Office is composed of four primary divisions: Patrol, Detention, Special Services, and Support Services. The Patrol Division serves the unincorporated areas of Ventura County and five contract cities (Camarillo, Fillmore, Moorpark, Ojai, and Thousand Oaks). The patrol stations that serve the Project Site include:

- East County Patrol Station: 2101 East Olsen Road, Thousand Oaks
- Moorpark Patrol Station: 610 Spring Road, Moorpark

The Patrol Division also includes the Mounted Unit, Canine (K-9) Unit, Sheriff's Communication Center, the Office of Emergency Services, and a Tactical Response Team. The Sheriff's Office of Emergency Services (OES) provides whole community emergency management services which include, disaster planning, emergency alert and warning, the implementation of emergency evacuation plans, the maintenance and operation of the County Emergency Operations Center, and leading recovery operations. The Sheriff's Communication Center (SCC) handles all law enforcement calls for the unincorporated communities and five contracted cities in Ventura County by working with the Patrol Division to provide response services.

The Patrol Division is the largest division in the Sheriff's Office. As part of its responsibilities, the Patrol Division initiates regular community engagement focused on crime reduction and quality of life issues.

The East County Station was built in 1988, and the facility encompasses 58,000 square feet of space on 11 acres of land in the northeastern part of the City of Thousand Oaks. The City of Thousand Oaks has contracted with the Ventura County Sheriff's Office for police services since 1964. In addition to the City of the Thousand Oaks, East County Patrol Station provides police services to the unincorporated areas including Lynn Ranch, Casa Conejo, Kelley Estates, Hidden Valley, Oak Park, and Bell Canyon. In addition to sworn and civilian personnel, this station relies on tremendous volunteer support through Volunteers in Policing (VIPs), Disaster Assistance

Response Team (DART), Search and Rescue, and Explorers who all donate their time, energy and expertise.

The Moorpark Patrol Station provides law enforcement services to the City of Moorpark on a contract basis. In addition to the City of Moorpark, the station provides police services to unincorporated areas including Santa Rosa Valley, Moorpark Home Acres, Happy Camp, Fruitvale, Santa Susanna Knolls, Box Canyon, Tapo Canyon, Balcom Canyon, Bradley, Stockton, and Grimes Canyon. As collateral assignments to patrol responsibilities, the station hosts four deputies who serve as gang officers and three others assigned to bicycle patrol detail.

ii) Detention Division

The Detention Division oversees inmate services, jail facilities, and court services. The County has three jail facilities. The Main Jail, the Todd Road Jail, and the East County Jail. The Main Jail (pre-detention facility) accepts arrestees from all law enforcement agencies. The Main Jail facility has capacity for approximately 890 sentenced and un-sentenced inmates, and processes over 29,000 bookings and releases every year. The facility is operated by over 250 sworn and non-sworn personnel.

The Todd Road Jail has a capacity of 796 inmates and is staffed by 185 sworn and non-sworn personnel. The Todd Road Jail also houses Inmate Services for all three jail facilities, which is a program for inmates geared toward reducing rates of recidivism, including academic, vocational, re-entry planning, substance abuse and treatment, and religious programs. This facility also houses Food Services, the Laundry Department, as well as the Commissary, which serves all three jail facilities.

The East County Jail (ECJ) Facility, located at the East County Patrol Station in Thousand Oaks, operates as both a booking and housing facility. The ECJ has a maximum capacity of 34 inmates.

The Detention Division includes the Court Services Bureau, with 102 professional and sworn staff, deployed between three courthouses and providing transportation to and from all of the jails. The three courthouses in the Ventura Superior Court system are the East County Courthouse in Simi Valley, the Juvenile Justice Center, located in the unincorporated area north of Oxnard, and the Hall of Justice, located in the city of Ventura.

ii) Simi Valley Police Department

The Simi Valley Police Department (SVPD) is the primary law enforcement agency for the City of Simi Valley, responsible for patrols, investigations, traffic enforcement, and community policing within the city limits. As with many municipal police agencies in California, SVPD participates in mutual aid agreements under the State's Law Enforcement Mutual Aid Plan, with Ventura County through the Sheriff's Department acting as the Operational Area Law Enforcement Mutual Aid Coordinator for unincorporated areas and for assisting municipalities when SVPD resources are exceeded. Under these arrangements, SVPD can request support from the Sheriff's Department or other agencies in Ventura County (for example SWAT, major incident response, large scale emergencies, crowd control or disasters) when needed. These mutual aid protocols formalize how

jurisdictions share personnel, equipment, command, and notification responsibilities, to ensure coordinated, efficient responses to incidents beyond what any single agency can handle alone.

b) Project Site Conditions

As discussed above, the camp maintains an Emergency Preparedness and Procedures Plan, updated annually, that provides procedures to be followed in the event of different types of emergencies. The current plan, for summer 2025, is included in Appendix L-1 of this Draft EIR. As detailed in this plan, the camp maintains procedures in the event of emergencies, such as a hostile event/lockdown, bomb threat, or suspicious person or item identified on the campus. In addition, the following security practices are currently in place:

- Controlled front gate access, with contracted outside security.
- Cameras at the front gate, and additional locations around the campus.
- Locked back gates behind the House of the Book, the Runkle border, and the border with Santa Susana Field Lab.
- During the summer, additional guards, plus a roving patrol vehicle 24/7.
- Frequent courtesy patrols by local authorities.
- Weekly training with K-9 patrol units.
- Frequent training on campus by local SWAT units.
- Weekly fence patrol using drone and/or horseback and four-wheel drive vehicles.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.

b) Project-Specific Impacts

Impact POL-1 **The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Therefore, Project impacts related to police protection services would be less than significant.**

The Project includes expansion of an existing recreational camp facility. Six existing buildings would be demolished to make way, in part, for the development of a welcome center, 16 new

counselor and camper cabins, an arts pavilion, parking lot, and new trails and landscaping. Additionally, the Project would increase the maximum number of campers from 472 to 572 and would increase the frequency of events.

The Project would continue to employ security measures at the Project Site, as described above, including controlled vehicular access, secured and alarmed pedestrian access to buildings, 24-hour security cameras, lighting, on-site security personnel.

Through use of on-site security measures and compliance with any recommendations made by the Sheriff's Office, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Therefore, Project impacts related to police protection services would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant

c) Cumulative Impacts

Implementation of the Project in conjunction with the related projects could potentially increase demand for police protection services. On-going development requires each jurisdiction (e.g., County of Ventura, City of Simi Valley, etc.) to continually evaluate the need for new or physically altered facilities to maintain adequate service ratios. Furthermore, the increased demands for additional police facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.N RECREATION

This section analyzes the potential impacts of the Project related to recreational facilities. The analysis addresses questions listed in Section XV. Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires an analysis of whether a project would increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or whether a project includes recreational facilities or would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

1. Regulatory Setting

a) Federal

i) National Park Service

The National Park Service (NPS) was established in 1916 under the National Park Service Organic Act. The NPS manages its facilities under a policy known as "the dual mandate," which requires NPS to preserve the natural and cultural resource under their jurisdiction for future generations while providing for the "enjoyment" (often in the form of recreation use) of the areas under their purview.

b) State

i) Santa Monica Mountains Conservancy Act

The Santa Monica Mountains Conservancy Act is a State law (enacted 1979, AB 1312, amended into the Public Resources Code) that established the Santa Monica Mountains Conservancy (SMMC) as a state agency with the mission of preserving, restoring, and providing public access to open space, trails, wildlife habitat, and recreation across the "Santa Monica Mountains Zone." Under the Act, the SMMC has authority to acquire land (by purchase, donation, or other means) and interests in land; it works with public and private partners to protect natural, scenic, and recreational resources; it ensures public trails and access corridors; and it helps local governments and other agencies implement the Conservancy's policies. It includes provisions for cooperating with cities and counties, for conserving habitat connectivity, and for making sure acquisitions are consistent with a comprehensive plan. The Zone itself is large, spanning parts of Los Angeles and Ventura Counties, including both urban and wilderness lands, with over 75,000 acres already preserved under its oversight.

ii) California Government Code

The Quimby Act (California Government Code Section 66477, as amended by Assembly Bill 1359), allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements or pay fees to acquire parkland.

iii) California Land Conservation Action of 1965 (Williamson Act)

The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value.

iv) Public Resources Code

The State Public Park Preservation Act (Public Resources Code 5400-5409) is the primary instrument for protecting and preserving parkland in California. Under the Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland required. This ensures no net loss of parkland and facilities.

Public Resources Code Section 5076 requires counties to consider trail-oriented recreational use and shall consider such demands in developing specific open space programs during the development of the General Plan. Cities are also required to consider the feasibility of integrating their trail routes with appropriate segments of the state system.

2. Environmental Setting

a) Existing Conditions

Open space lands occupy more than half of the land area in Ventura County. The United States Forest Service (USFS) owns the largest share of open space land in Ventura County: the portion of the Los Padres National Forest in the county encompasses 561,488 acres and covers most of north Ventura County. There are more than 307 unique open space lands, ranging from small municipal neighborhood parks under an acre to large, federally managed parks like the Santa Monica Mountains National Recreation Area (SMMNRA), which spans more than 150,000 acres across both Los Angeles and Ventura counties and is managed by the National Park Service. In addition to the federal role, state and regional agencies play a critical part in preserving and managing Ventura County's open space. The Santa Monica Mountains Conservancy (SMMC) and its joint-powers partner, the Mountains Recreation and Conservation Authority (MRCA), acquire and manage lands, restore habitat, and expand recreational access within and around the Santa Monica Mountains and the Rim of the Valley Corridor. Together, these entities contribute to a diverse and interconnected system of open space that protects natural resources while offering extensive recreation opportunities for residents and visitors.

A wide variety of recreation opportunities exist in the unincorporated areas of the County including, but not limited to, mountain hiking trails, bicycle paths, beach parks, golf courses, camp sites, equestrian facilities, access to the offshore Channel Islands, and lakes.

i) County of Ventura Parks

The Ventura County Parks Department (part of the County's General Services Agency) manages park and recreation facilities throughout the County.

A. Categories and General Standards for Park and Recreation Facilities

Recreation facilities managed by the Ventura County Parks Department are categorized as either Regional, Local, or Trails/Corridors. These categories are briefly described below. The general planning standard for Regional Parks is five acres of developable land, per one thousand people and the facility should be accessible to the major portion of the population within 30 to 60 minutes travel time. Similarly, the planning standard for Local Parks is five acres per one thousand people and are typically within walking distance of the communities where they are located. The general planning standard for Trails and Corridors is 2.5 miles per one thousand people.

Regional: There are five specific regional park classifications that are based on measures or values placed on the area or site including, but not limited to accessibility, physical and/or visual attributes, its potential for offering a quality experience or for meeting needs for a highly specialized use. The following classifications were approved by the Board of Supervisors:

1. Regional Parks: A Regional Park should include sufficient developable land to accommodate large, organized groups or family gatherings without sacrificing the basic qualities of the area or the specific attributes that support specialized use. A Regional Park may contain a variety of specialized facilities or natural features that in combination will support recreation experience of County-wide significance.

2. Recreation Parks: A Recreation Park should provide facilities for a comprehensive recreation program to serve a population of approximately 200,000 by providing facilities such as sports fields, courts, courses, and gyms. It is designed to handle large-scale multiple participant sports programs and can accommodate tournament competition. It may also offer incidental passive recreation areas and local park facilities, such as small picnic areas and playgrounds. It is usually not less than 30 acres in size and may comprise the active recreation element of a regional park.

3. Preserves: A Preserve is an extent of land preserved from development to protect unique scenic resources, unusual native plants and animals, geologic phenomena, or historical sites or buildings. It may be part of a regional recreation area or a singular entity.

4. Regional Open Space: A Regional Open Space is any space, the preservation of which in its natural condition would maintain or enhance the aesthetic quality of a regional recreation area, a major portion of the County, or contribute to the logical control of urban development.

Specialized Facilities: A Specialized Facility is a singular area or facility that provides specialized recreation opportunities that are of regional or County-wide significance. It may be an individual element, or it may be a unit of a larger or more inclusive regional park. Specialized Facilities may include but are not limited to amphitheaters (bowls), auditoriums, botanical gardens, day use

beaches, equestrian centers, fairgrounds, golf courses, museums, nature centers, off-road vehicle areas, campgrounds, group picnic grounds, riding and hiking trails, vista points and zoos.

1. Local: The local park provides facilities to serve the daily needs of a defined neighborhood or group of neighborhoods within an urban community. The specific facilities should be determined by the needs of the community. Local park acres should provide for three main types of recreation: 1) Open areas for passive recreation and relaxation; 2) Active sports areas for baseball, basketball and other court games; and 3) A neighborhood center for group activities.

2. Trails/Corridors: There are many existing and proposed trail systems within the County that serve or will serve bicycles, pedestrians and equestrians. Several regional trails/corridors link major park and recreation facilities. In the south half of the County, the state and federal government have extensive trails in the Santa Monica Mountains and the Conejo Recreation and Parks District has developed many miles of trails connecting various parks and recreation areas in and around Thousand Oaks. Trails in the Los Padres National Forest in the north half of the County also serve motorcycles and other off-highway vehicles.

B. County of Ventura Park Facilities

The Ventura County Parks Department organizes its facilities into five categories: (1) Inland; (2) Beach; (3) Trails; (4) Golf; and (5) Community Centers. The recreational resources provided by Ventura County Parks Department are summarized in Table IV.N-1. In addition to the park name, location, amenities, and size, the table indicates whether the park is “Regional,” (i.e., intended to be used as a countywide resource) “Local,” (i.e., intended to be used by those who live near the park) and/or “Leased” (owned by county but managed by private concessionaires). While Table IV.N-1 identifies all facilities within Ventura County, the following facilities are within approximately 10 miles of the Project Site:

- Happy Camp, Moorpark
- Oak Park, Simi Valley
- Tapo Canyon Regional Park, near Simi Valley
- Rustic Canyon Golf Course, Moorpark

Table IV.N-1
Ventura County Regional Recreation System

Name and Location	Park Type	Amenities	Size
Inland Parks			
Camp Comfort Ojai	Regional	A day use and overnight facility. San Antonio Creek flows through the park.	34.8 acres
Dennison Park located near Ojai	Regional	A day use and overnight facility. Family and group covered BBQ areas are available by reservation.	32.4 acres
Foster Park Ventura	Regional	Two separate day use areas and two campgrounds. The Ojai Valley trail goes through the park.	201.5 acres
Happy Camp Moorpark	Regional	Regional wilderness with 12.5 miles of trails.	2,952.25 acres
Kenney Grove Park Fillmore	Leased	A developed RV park owned by the County but operated by a private party.	15.40 acres
Oak Park Simi Valley	Regional	A day use and overnight facility.	132.83 acres
Santa Rosa Valley Park east of Camarillo	Regional	A day use facility that includes two equestrian riding areas.	50.07 acres
Saticoy Park Saticoy	Local	A neighborhood park with sports fields. After school programs are provided by the local Boys and Girls Club at this facility.	3.1 acres
Soule Park Ojai	Regional	A day use facility with picnic areas, dog park, and equestrian riding areas.	15.3 acres
Steckel Park near Santa Paula	Regional; Leased	A day use and overnight facility. The park contains a playground and a large aviary.	193.41 acres
Tapo Canyon Regional Park near Simi Valley	Regional	A day use and overnight facility. The campground contains full hook-ups for RVs along with an equestrian arena.	210.60 acres
Toland Park Santa Paula and Fillmore	Regional	Hiking opportunities available. A group youth tent camp is available by reservation.	212.92 acres
Warring Park Piru	Local	Amenities include a softball diamond and a basketball court.	3.9 acres
Beach			
Faria Beach Park Pacific Coast Highway	Regional	The park offers day use beach access along with camping (some sites have full hook-ups).	1.76 acres
Hobson Beach Park Pacific Coast Highway	Regional	The park offers day use beach access along with camping (some sites have full hook-ups).	1.7 acres
Rincon Parkway Pacific Coast Highway	Regional	An RV overnight parkway area located along Highway 101 along the ocean front.	1.4 acres
Trails			
Ojai Valley Trail Ojai and Ventura	Regional	National Recreation Trail is parallel to Highway 33 and connects Ojai and Ventura	9.5 miles
Piru Trail Piru	Local	Paved trail connects the Town Center and Warring Park.	0.85 mile
Shelf Road Trail northern edge of Ojai	Local	Unpaved road located on the northern edge of Ojai.	0.6 mile

Table IV.N-1
Ventura County Regional Recreation System

Name and Location	Park Type	Amenities	Size
Sulphur Mountain Trail Near Ojai	Regional	Unpaved with views of Ojai Valley and mountains. Located off Sulphur Mountain Rd along Hwy 33.	11.5 miles
Golf Courses			
Rustic Canyon Moorpark	Regional; Leased	18-hole golf course located within Happy Camp Regional Park	407.72 acres
Saticoy Regional Ventura	Regional; Leased	9-hole golf course	48.62 acres
Soule Park Golf Course Ojai	Regional; Leased	18-hole golf course	200.0 acres
Community Centers			
Casitas Springs Casitas Springs	Local	1 large room and 1 small room for parties and meetings	n/a
Jose Flores Saticoy	Local	1 large room and 1 small room for parties and meetings	n/a
Oak View Oak View	Local	Child's playground area, basketball court. 1 large room and 1 small room for parties and meetings	n/a
Piru Piru	Local	Baseball field. 2 Rooms - 1 Large Room and 1 Small Room available for parties and meetings.	n/a
Roger Jones El Rio	Local	Park with outdoor BBQ, basketball court, playground. 1 room for parties and meetings.	n/a
Source: County of Ventura General Plan, Background Report.			

C. Rancho Simi Recreation and Parks District

The Rancho Simi Recreation and Park District (RSRPD) is a special district in Ventura County, established in 1961, whose mission is to provide parks, open space, recreation programming, and community amenities for residents of Simi Valley and unincorporated areas. It operates dozens of parks (urban, neighborhood, and open space), trails, recreation facilities, pools, golf courses, equestrian centers, and event and rental facilities, maintaining over 5,600 acres of public lands including preserved foothills, canyon open space, and wildlife habitat. RSRPD also offers a wide variety of programs and services from youth and senior programs to aquatics, camps, classes, arts, outdoor events, and nature trails, making the RSRPD a key agency in maintaining quality of life, public access to nature, and recreational opportunities in the region. Parks and recreational facilities operated by the RSRPD are shown in Table IV.N-2.

Table IV.N-2
RSRPD Parks and Recreational Facilities

Park/Facility Name and Address	Amenities
Arroyo Park 2105 Socrates Ave., Simi Valley, CA 93065	Picnic Table, Playground Area
Arroyostow Park 1700 N. Stow St., Simi Valley, CA 93063	Playground Area, Walking Path
Atherwood Park 2271 Alamo St., Simi Valley, CA 93065	Playground Area, Picnic Table, Walking Path
Berylwood Park 1955 Bridget Ave., Simi Valley, CA 93065	Basketball, Parking, Pavilion/Gazebo, Picnic Table, Playground Area, Restrooms, Skate Plaza, Volleyball
Big Sky Park 2151 Lost Canyons Dr., Simi Valley, CA 93065	Basketball, Parking, Picnic Table, Playground Area, Restrooms, Softball Fields
Challenger Park 298 First St., Simi Valley, CA 93065	Note: This park is undeveloped; However, if you are looking for a hike, this location facilitates the Creekside Trailhead just off the parking-lot loop;
Chumash Park 3200 Flanagan Dr., Simi Valley, CA 93063	Adult Fitness Center, Basketball, Parking, Picnic Table, Playground Area, Walking Path
Citrus Grove Park 2100 N. Marvel St., Simi Valley, CA 93065	Picnic Table, Playground Area, Walking Path
Corriganville Historical Park 7001 Smith Rd., Simi Valley, CA 93063	BBQ, Benches, Drinking Fountain, Equestrian Trail, Hiking Trails, Kiosks, Picnic Tables, Restrooms
Coyote Hills Park 275 Valley Gate Rd., Simi Valley, CA 93063	Basketball, Horse Paddock, Horse Trail (mini), Picnic Table, Playground Area, Walking Path
Darrah Volunteer Park 3700 Royal Ave. Simi Valley, CA 93065	Baseball Fields
Foothill Park 1850 Ardenwood Ave., Simi Valley, CA 93063	Basketball, Picnic Table, Playground Area
Frontier Park 2163 Elizondo Ave., Simi Valley, CA 93065	Playground Area
Houghton-Schreiber Park 4333 Township Dr., Simi Valley, CA 93063	Baseball Fields, Basketball, Parking, Playground Area, Volleyball Court
Knolls Park 1300 W. Katherine Ave., Simi Valley, CA 93063	Baseball Field, Playground Area, Walking Path
Lincoln Park 1215 First St., Simi Valley, CA 93065	Adult Fitness Area, Basketball, Picnic Table, Playground Area, Walking Path
Mayfair Park 2550 Caldwell Ave., Simi Valley, CA 93065	Adult Fitness Circuit, Basketball, Handball, Picnic Table, Playground Area, Softball Field, Walking Path
Rancho Madera Community Park 556 Lake Park Dr., Simi Valley, CA 93065	Amphitheater, Basketball, Parking, Pavilion/Gazebo, Playground Area, Restrooms, Soccer Field, Softball Field, Tennis Courts, Volleyball, Walking Path

Table IV.N-2
RSRPD Parks and Recreational Facilities

Park/Facility Name and Address	Amenities
Rancho Santa Susana Community Park 5005 Los Angeles Ave., Simi Valley, CA 93063	Amphitheater, Horseshoe Pits, Parking, Picnic Table, Playground Area, Restrooms, Soccer Fields, Softball Fields, Walking Path
Rancho Simi Community Park (Duck Park) 1765 Royal Ave., Simi Valley, CA 93065	Amphitheater, Basketball, Fishing, Horseshoe Pits, Parking, Pavilions/Gazebo, Pickleball Courts, Picnic Table, Playground Area, Pool (swimming), Restrooms, Shuffleboard Courts, Soccer Field, Softball Fields, Tennis Courts, Walking Path
Rancho Tapo Community Park (Lemon Park) 3700 Avenida St., Simi Valley, CA 93063	Adult Fitness Area, Amphitheater, Basketball, Bocce Ball Court, Parking, Pavilion/Gazebo, Pickleball Courts, Picnic Tables, Playground Area, Restrooms, Softball Field, Splash Pad, Tennis Courts, Walkway Path
Old Windmill Park 201 E. Long Canyon Rd., Simi Valley, CA 93065	Basketball, Parking, Playground Area, Walking Path
Rocky Pointe Natural Park On Kuehner Dr., north of Smith Rd.	This park is a "natural park": The landscape is left unaltered.
Runkle Canyon Park 3302 Fir Ave., Simi Valley, CA 93065	Basketball, Parking, Pavilion/Gazebo, Picnic Table, Playground Area, Volleyball Courts, Walking Path
Santa Susana Park 6503 Katherine Rd., Simi Valley, CA 93063	Baseball Field, Basketball, Parking, Pavilion/Gazebo, Picnic Table, Playground Area, Restrooms, Volleyball Court
Sequoia Park 2150 Tracy Ave., Simi Valley, CA 93063	Disc Golf Course, Picnic Table, Playground Area, Walking Path
Simi Hills Neighborhood Park 5031 Alamo St., Simi Valley, CA 93063	Fishing
Strathearn Historical Park & Museum 137 Strathearn Place, Simi Valley, CA 93065	Picnic Tables, Restrooms
Stargaze Park 355 Stargaze Ave., Simi Valley, CA 93065	Basketball, Picnic Table, Playground Area
Sycamore Canyon Park 502 S. Martha Morrison Dr., Simi Valley, CA 93065	Basketball, Parking, Pavilion/Gazebo, Picnic Table, Playground Area, Walking Path
Sycamore Park 855 N. Planetree Ave., Simi Valley, CA 93065	Basketball, Disc Golf Course, Picnic Table, Playground Area, Softball Field, Walking Path
Verde Park 6045 E. Nelda St., Simi Valley, CA 93063	Picnic Table, Playground Area, Softball Field, Volleyball
Vista Del Arroyo Park 3455 Chicory Leaf Place, Simi Valley, CA 93065	Basketball, Picnic Table, Pavilion/Gazebo, Playground Area, Walking Path
Willowbrook Park 1786 Willowbrook Ln., Simi Valley, CA 93065	Picnic Table

Source: Rancho Simi Recreation and Park District.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

b) Project-Specific Impacts

Impact REC-1: **The Project does not include residential development, would not increase staff population or year-round residences. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impacts related to use of neighborhood and regional parks, trails, or other recreational facilities would occur as a result of the Project.**

The Project includes expansion of an existing recreational camp facility, which could help fulfill a recreational need of the community. The Project does not include development of any residential uses, would not increase the number of residents in the Project Site area, would not increase staff population or year-round residences, and would not create an increased demand for parks and recreational facilities, including trails, associated with a residential population. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, including trails, such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impacts related to use of neighborhood and regional parks or other recreational facilities would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact REC-2: **The Project includes the expansion of existing recreational facilities. As disclosed in this Draft EIR, all Project impacts would be less than significant after implementation of mitigation measures (where required).**

The Project includes the expansion of existing recreational facilities at Camp Alonim. The environmental impacts associated with the expansion of the camp are assessed throughout the Draft EIR. As provided in Sections IV.A through IV.R of this Draft EIR, all impacts of the Project

would be less than significant, with implementation of mitigation measures, where required. Therefore, the expansion of the Project's recreational facilities would not have an adverse physical effect on the environment.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As discussed above, the Project includes the development of additional facilities at the existing camp site, and the impacts associated with the proposed expansion have been determined to be less than significant by the analyses provided in this Draft EIR. The residential related projects would create an additional demand for parks and recreational facilities. However, as the Project does not include any residential uses, it would not create an additional demand for recreational facilities and would not contribute to a cumulative impact. Therefore, cumulative impacts with respect to parks and recreational facilities would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.O TRANSPORTATION

This section analyzes the potential impacts of the Project related to transportation and is based primarily on the following sources, which are included as Appendices J-1 and J-2:

J-1 Supplemental VMT Assessment, LLG Engineers, January 24, 2025.

J-2 Review of VMT Assessment, County of Ventura Public Works, May 15, 2025.

1. Regulatory Setting

a) Federal

i) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

b) State

i) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

ii) Assembly Bill 32 and Senate Bill 375

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the State comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

iii) California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. CVC Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

iv) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

OPR also developed the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which provides non-binding recommendations on the implementation of VMT analysis methodology that has significantly informed the way VMT analyses are conducted in the State. The updated CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Technical Advisory provides considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

v) CEQA Guidelines Section 15064.3

As discussed above, relatively recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts.

Generally, according to this section and LCI Guidance,[1] projects within 0.5 mile of major transit/high-quality transit corridor, projects generating fewer than 110 daily trips, local-serving retail/public services, 100 percent affordable housing projects, and some projects consistent with regional planning efforts are presumed to cause a less-than-significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence.

c) Regional

i) Ventura County Initial Study Assessment Guidelines (ISAG)

As discussed in the County ISAG, the Ventura County Transportation Model (VCTM) currently divides Ventura County into 663 unique traffic analysis zones (TAZs). Similar types of development within TAZs can generally be expected to generate VMT metrics in line with the baseline metrics. The TAZs can therefore be utilized to screen projects unless the development has unique land uses or operating characteristics significantly different from existing development within the TAZ. Ventura County utilizes a Countywide VMT Screening Evaluation Tool to assist in determining whether a project is screened for residential, office, and industrial land use types. A proposed land use project is presumed to have a less than significant impact on VMT if the project meets any of the following screening criteria:

- Generates or attracts fewer than 110 net vehicle average daily trips.
- Includes 100 percent affordable housing residential development associated with infill development.
- Includes mixed-use development with a residential housing component of 100 percent affordable housing and is associated with infill development.
- Is a “local serving retail” project (defined as retail with a combined gross floor area of less than 50,000 square feet).
- Is a residential, retail, office, or mixed-use project located within a half mile of a Transit Priority Area as defined in Public Resources Code (PRC) Section 21099 or a transit stop along a “high-quality transit corridor” as defined in PRC Section 21155 and has a floor area ratio of 0.75 or more.
- Is located within a low VMT area designated for residential, office, or industrial uses in the General Plan and incorporates features (i.e., density, mix of uses, transit accessibility) consistent with existing land uses within the area.

[1] Note that on July 1, 2024, the Governor’s Office of Planning and Research was renamed as the Governor’s Office of Land Use & Climate Innovation (LCI). Therefore, all current references to this office will refer to the LCI.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

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

b) Conflict or be inconsistent with State CEQA Guidelines §15064.3(b);

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

d) Result in inadequate emergency access.

b) Project-Specific Impacts

Impact TRANS-1: The Project would be consistent with all applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. No significant impacts related to this issue would occur as a result of the Project.

All of the Project's improvements would occur within the boundaries of the existing camp and would not include any development or roadway improvements beyond the Project Site. The Project would not affect any transit, roadway, bicycle, or pedestrian facilities or future plans for such facilities. Thus, the Project would not conflict with any applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. No significant impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact TRANS-2: The Project would not generate a comparatively higher VMT than other summer camp facilities in the region (the applicable significance threshold). Therefore, Project impacts related to VMT would be less than significant.

The discussion provided below is based on the VMT Assessment prepared for the Project (included in Appendix J-1 of this Draft EIR). As discussed in greater detail below, the analysis contained in the VMT Assessment determined that quantitative analysis using the VCTM would be inappropriate, given the unique characteristics of the Project (expansion of a summer camp as opposed to a new residential or commercial development, for example). Therefore, the VMT Assessment provides a qualitative analysis of Project VMT impacts. Since the County's guidelines do not provide direction on qualitative VMT assessments, the analysis prepared for the Project is

based on the recommendations provided in the Technical Advisory as well as the County's ISAG. Accordingly, the analysis addresses whether the Project would generate a higher or lower VMT than other summer camp facilities in the region, and if the Project were found to result in a comparatively higher VMT than other summer camp facilities in the region, this would represent a significant impact. The County of Ventura Public Works Agency, Roads and Transportation Department reviewed the VMT Assessment and concurred with the methodology as well as the findings (see memorandum attached as Appendix J-2 of this Draft EIR).

Project Trip Generation

Project trip generation was derived based on empirical data obtained from existing traffic counts and estimated number of guests and average vehicle occupancy for the summer camps, temporary events, and assembly uses. It should be noted that concurrent summer camps, temporary events, and assembly uses are rarely expected to occur. However, the weekday daily, AM, and PM peak-hour trip generation shown below does reflect concurrent uses of the summer camps, temporary events, and scheduled events in order to evaluate the worst-case condition:

Concurrent Use/Worst-Case Project Trip Generation

Weekday Daily: 563 net new trips (297 inbound trips, 266 outbound trips)

Weekday AM Peak Hour: 16 net new trips (11 inbound trips, 5 outbound trips)

Weekday PM Peak Hour: 12 net new trips (7 inbound trips, 5 outbound trips)

Screening Criteria

Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. In the LCI Technical Advisory and the County's ISAG, screening criteria are provided based on the number of daily vehicle trips, existing low VMT areas, proximity to high-quality transit, and inclusion of affordable housing.

Proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is generally sufficient for screening purposes. Projects, or project components, which are screened out of detailed VMT assessment based on these criteria are presumed to have less than significant transportation impacts. Projects or project components which are not screened out would be required to conduct a formal Transportation Impact Analysis in order to determine the significance of project impacts.

Small Project Trip Generation Screening Criteria

As described previously, the County's guidelines do not provide direction on qualitative VMT assessments, and therefore, the analysis prepared for the Project is based on the recommendations provided in the County's ISAG and the Technical Advisory. The Technical Advisory provides the following evidence for this presumption:

> *CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where*

public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, itis reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

As presented above, the Project is forecast to generate a total of 563 daily net new vehicle trips under worst-case conditions. Therefore, it exceeds the 110 daily vehicle trip screening threshold, and the small Project trip generation screening criterion is not satisfied.

Low VMT Area Screening Criteria

It is assumed that projects which will be located within areas which currently exhibit low VMT, and that incorporate similar features pertaining to density, land use mix, and transit availability, will tend to exhibit similar low VMT. In areas where the existing VMT generation already falls below the applicable thresholds, and where projects are likely to generate similar levels of VMT, projects may be screened out of preparing detailed VMT analysis. LCI notes that such screening is appropriate for residential and office projects. Based on the unique characteristics of the proposed project and the minimal existing development within the Transportation Analysis Zone (TAZ) in which the Project is located, this screening criterion is determined to not be applicable.

Screening Conclusions

The Project does not meet any of the screening criteria recommended in the Technical Advisory. Therefore, the Project is required to provide an impact assessment in order to determine the significance of project-generated VMT impacts.

VMT Impact Analysis

County staff acknowledged that quantitative analysis utilizing the VCTM would not be appropriate given the unique characteristics of the Project. It is understood that regional travel demand models cannot accurately evaluate intermittent and seasonal uses such as the summer camps, temporary events, and assembly uses which are planned to be accommodated at the Project Site. Therefore, in consultation with County staff, it was determined that a qualitative VMT assessment would be the most appropriate, based on whether the Project would generate a higher or lower VMT than other summer camp facilities in the region, and if the Project were found to result in a comparatively higher VMT than other summer camp facilities in the region, this would represent a significant impact. Similar to other summer camp facilities, the Camp Alonim Project represents a regional draw in that camp participants and staff reside throughout the greater Southern California region and beyond (as described in further detail below). Therefore, the Project was assessed to determine whether it would be likely to generate higher or lower VMT than other summer camp facilities in the region. A comparatively higher VMT would represent a significant impact, whereas a comparatively lower VMT would result in a less than significant impact.

Qualitative VMT Assessment

The Project is expected to improve the proximity of camp facilities serving the local community, thereby shortening travel distances and reducing VMT. The Project would provide the availability for 100 additional campers to attend summer camp at the Project Site. Based on the Project Site's location in close proximity to a large metropolitan area, the Project would reduce the distance campers would need to travel for a camp experience, leading to reduced VMT when compared to other locations in the greater Southern California region. In the absence of the expanded Camp Alonim site, future campers or special event patrons would be required to travel to comparable summer camps throughout the Southern California region which are located farther away, thus leading to longer trips and increased regional VMT.

Approximately half of the other existing camp facilities are located within a 50-mile radius from the Project Site, while the other remaining half are located further within a 100-mile radius. As the nearest comparable facility (i.e., prior Camp Hess Kramer/Gindling Hilltop Camp located at 11495 Pacific Coast Highway, Malibu) is located roughly 40 miles southwest of the Project Site and is not currently in operation due to the 2018 Woosley Fire, the Project is expected to improve proximity of camp facilities for the community located in the surrounding area.

Spatial Distribution of Existing Campers and Staff

The spatial distribution data for the existing campers and staff are based on the existing camper and staff population by ZIP codes and has been assumed to apply to the future conditions/projections with the increase of camper population. No significant shifts in the home location of existing camp patrons or staff are expected to occur as a result of the Project, and future campers and staff are expected to be drawn from the same general locations. While a small proportion of both campers and staff are located in the Ventura County area (e.g., Cities of Simi Valley, Thousand Oaks, Moorpark, Camarillo, and Ventura), the majority of campers and staff (e.g., approximately 73 percent) are drawn from ZIP codes within Los Angeles County. A smaller number of staff are drawn from the Counties of Santa Barbara, Orange, and San Diego, as well as from Central and Northern California and from out of state.

Approximately 19 percent of the total camper and staff population reside within 5 to 10 miles from the Project Site, and 35 percent of the total camper and staff population reside within 10 to 20 miles of the Project Site. When compared to other camp facilities, the existing Camp Alonim camper and staff population are generally situated within 50 to 100 miles of other comparable camp facilities, which are much farther away than the Project Site. For the next nearest camp facility to the Project Site (i.e., prior Camp Hess Kramer), 65.8 percent of the Camp Alonim camper and staff population reside within 20 to 50 miles from that site. Travel between the current locations of Camp Alonim campers and staff and other comparable camp locations would require longer vehicle trips and result in higher regional VMT. The Project would increase the proximity of summer camp opportunities nearest to a large metropolitan area with the highest concentration of participants and staff, resulting in comparatively shorter vehicle trips and lower VMT than if participants and staff had to travel to other locations in the greater Southern California region.

Given the spatial distribution of the Camp Alonim camper and staff population between the Project Site and other camp locations, it is qualitatively concluded that the Project would reduce VMT by

shortening trips between participants and staff to a camp location at the Project Site compared to a farther location elsewhere in the greater Southern California region. Since the Project is expected to reduce VMT compared to other summer camp facilities, the Project is determined to have a less-than-significant VMT impact.

Summary of Key Findings and Conclusions

This qualitative VMT assessment has been conducted to identify and evaluate the potential impacts of the Project based on the VMT screening criteria, methodology, and thresholds recommended in LCI's Technical Advisory on Evaluating Transportation Impacts in CEQA as well as the County's ISAG. By increasing capacity nearest to the greatest regional concentration of future participants, the Project would result in shorter vehicle trips in place of longer ones, thus reducing VMT compared to other summer camp facilities. Therefore, it is qualitatively concluded that the Project would have a less than significant VMT impact.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact TRANS-3: The Project does not include the development of or changes to any offsite roadway infrastructure. Thus, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, no impacts related to this issue would occur.

As stated previously, all of the Project's improvements would occur within the boundaries of the existing camp and would not include any development or roadway infrastructure beyond the Project Site. The Project would not change the use of the Project Site. Thus, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). No significant impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact TRANS-4: The Project does not include the development of or changes to any offsite roadway infrastructure. The Project would comply with emergency access requirements. Thus, the Project would not result

in inadequate emergency access. Therefore, no impacts related to this issue would occur.

As stated previously, all of the Project's improvements would occur within the boundaries of the existing camp and would not include any development or roadway infrastructure beyond the Project Site. Also, the Project would not change the use of the Project Site. The Project would be required by the County to comply with all emergency access requirements such as those related to fire lanes, fire truck turnaround, building clearance, etc. The VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. Refer to Section IV.R, Wildfire, of this Draft EIR for a greater discussion of emergency access and evacuation. As discussed therein, the Project's expansion is not expected to substantially impair emergency access and evacuation. Thus, the Project would not result in inadequate emergency access. No significant impacts related to this issue would occur as a result of the Project.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

The analysis contained above determined that by increasing capacity nearest to the greatest regional concentration of future participants, the Project would result in shorter vehicle trips in place of longer ones, thus reducing VMT compared to other summer camp facilities, resulting in a less than significant VMT impact. It is possible that the related projects could result in transportation impacts. However, as demonstrated above, the Project would not result in any significant transportation impacts. Therefore, the Project does not have the potential to contribute to any potential cumulative transportation impacts, and no significant cumulative transportation impacts associated with development of the Project in concert with related projects would occur.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.P TRIBAL CULTURAL RESOURCES

This section evaluates potential impacts to tribal cultural resources that could result from implementation of the Project. The information and analysis presented below are based in part on the following source, which is included as Appendix D-3 of this Draft EIR:

D-3 Phase I Archaeological Survey of the Camp Alonim Improvements, W&S Consultants, September 29, 2022.

1. Regulatory Setting

a) State

i) Assembly Bill 52

Assembly Bill (AB) 52 was approved on September 25, 2014. AB 52 amended California Public Resources Code (PRC) Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American Tribes early in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. PRC Sections 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria in PRC Section 20174(a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "nonunique archaeological resource" as defined in PRC Section 21083.2(h) may also be a tribal cultural resource if it conforms with the criteria in PRC Section 21074(a).

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern.[1] Tribes interested

[1] Public Resources Code Sections 21080.3.1(b) and (c).

in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.[2]

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation of tribal cultural resources; and mitigation measures capable of avoiding or substantially lessening potential significant impacts to tribal cultural resources. Consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[3]

In addition to other CEQA provisions, the lead agency may certify an EIR or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to PRC Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.[4]

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not apply to data or information that are, or become, publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the Applicant or the Applicant's agents, or are lawfully obtained by the Project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.[5]

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2 Public Resources Code Sections 21080.3.1(d) and 21080.3.1(e)

3 Public Resources Code Section 21080.3.2(b)

4 Public Resources Code Sections 21082.3(d)(2) and (3)

5 Public Resources Code Section 21082.3(c)(2)(B).

PRC Section 21084.2 states that a project that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.

ii) California Public Resources Code

PRC Section 5097.98, as amended by AB 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities consider the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

PRC Section 5097.99 prohibits acquisition or possession of Native American artifacts or human remains taken from a Native American grave or cairn after January 1, 1984, except in accordance with an agreement reached with the NAHC.

PRC Section 5097.5 provides protection for tribal resources on public lands, where PRC Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

b) Regional

i) Ventura County General Plan

The Conservation Element of the County's General Plan contains the following policies regarding tribal cultural resources:

COS-4.1 Tribal, Cultural, Historical, Paleontological, and Archaeological Resources Inventory

The County shall maintain an inventory of tribal, cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources,

including record studies and reports filed with natural history programs, the California Historical Resources Information System and the Native American Heritage Commission.

COS-4.2(b) Cooperation for Tribal Cultural Resource Preservation

For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.

COS-4.4 Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation

The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of mitigation and/or extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.

Additionally, the County's General Plan contains the following programs related to tribal cultural resources:

COS-HH Cultural Records Research

As part of a discretionary application process, project applicants (Ventura County for County projects) shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.

COS-II Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

For discretionary projects, the County shall require the following:

- Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.
- If determined necessary by the County, an archaeological or paleontological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.
- If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation

identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.

2. Environmental Setting

Archaeological and ethnographic evidence indicates that Native American presence in the Simi Valley dates back 10,000 to 12,000 years ago, with the Chumash people forming a large and complex society that extended from Malibu to San Luis Obispo. The Chumash relied on a hunting, gathering, and fishing subsistence pattern that heavily incorporated marine resources, supporting large permanent villages and a hierarchical sociopolitical structure organized into chiefdoms, including the powerful Lulapin domain headquartered at Point Mugu. Within the Simi Valley, villages such as Ta'apu, Shimiyi, and Kimishax were established along key trails and water sources, with populations estimated between 250 and 400 when Europeans arrived. The place name "Simi" is derived from the Chumash word *Shimiyi* or *Simiji*, meaning "cloud," reflecting the valley's cultural and linguistic heritage. Despite the disruption caused by Spanish missionization, records and oral histories reveal that Simi Valley played a significant role within the eastern Ventura County Chumash sphere, with Ta'apu in particular functioning as a nodal inland village linked to larger coastal centers of political authority. In addition to the Chumash, the Fernandeno Tataviam (Tataviam) lived in the upper drainage of the Santa Clara River between the San Fernando Valley to the south and the top of Pastoria Creek in the Tehachapi Mountains to the north. To the east, their ancestral lands extended to part of the southern fringe of Antelope Valley. The core Tataviam population centered on the south sides of the Liebre, Sawmill, and Sierra Pelona Mountains. Neighboring groups include the Ventureño Chumash to the west, Emigdiano Chumash to the north, Kitanemuk to the northeast, Vanyume Serrano to the east, and Western Gabrielino to the south in the San Fernando Valley. Archaeological data indicate broad similarities among the Tataviam and Chumash. Information about Tataviam social organization and political structure is relatively limited, but there is no evidence that would substantially differentiate them from the Kitanemuk and Western Gabrielino. Tataviam villages ranged from large centers of around 200 individuals to small settlements of 10 to 15 people. Intermediate-sized villages were dispersed between the larger centers, with smaller villages spaced around the larger villages. Considering their environment and available data, it is probable that Tataviam relied more heavily on yucca as a staple than neighboring groups. Additional plant foods most likely included acorns, sage seeds, juniper seeds, and islay berries. Animal resources included small mammals such as rabbits and rodents, as well as deer and possibly antelope.

For additional details, refer to the *Phase I Archaeological Survey of the Camp Alonim Improvements* included in Appendix D-3 to this Draft EIR.

3. Impact Analysis

a) Thresholds of Significance

i) Appendix G of the CEQA Guidelines

The project would result in a significant impact to tribal cultural resources if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

b) Project-Specific Impacts

Impact TCR-1 **The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. No mitigation measures are required, and Project impacts would be less than significant.**

As discussed in Section IV.F, Cultural Resources, of this Draft EIR, the buildings on the Project Site do not appear to be eligible for the National Register, California Register, or for Ventura County Landmark designation and are not considered significant historical resources under CEQA. No other such features are known to exist on the Project Site. Thus, implementation of the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is also listed or eligible for listing as a historical resource, and Project impacts would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant

Impact TCR-2 **No tribal cultural resources are known to exist at the Project Site. However, based on the site's location and presence of resources in the vicinity, there may be unanticipated subterranean resources which could be substantially impacted during ground disturbance. Nonetheless, implementation of mitigation measures would reduce Project impacts to less than significant.**

The Project has complied with all required notification and consultation under AB 52. Under AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

The County Planning Division requested and received an updated contact list from the NAHC. Notification requesting consultation from tribal governments was issued on October 17, 2024. The notification was sent by email and certified mail to 17 contacts from the following tribes:

- Barbareno/Ventureno Band of Mission Indians
- Chumash Council of Bakersfield
- Coastal Band of the Chumash Nation
- Fernandeno Tataviam Band of Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrielino / Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Northern Chumash Tribal Council
- Santa Ynez Band of Chumash Indians

Of these contacts, only two tribes responded. The Santa Ynez Band of Chumash Indians declined consultation. The Fernandeno Tataviam Band of Mission Indians requested consultation. The consultation occurred on February 6, 2025 with Chief Administrative Officer Miguel Luna and Cultural Resource Consultant Sarah Brunzell. During consultation, the parties discussed the possibility of undiscovered subterranean resources. The Project Site's location suggests that it may have been used to travel between cultural sites. Because the site is highly disturbed and has been continuously used as a camp for nearly 80 years, a lack of surface findings is to be expected and would not preclude the possibility of subterranean resources. If unanticipated resources do exist, grading and ground-disturbing construction activities could potentially impact them. Therefore, based on the results of tribal consultation, Mitigation Measures MM-TCR-1 through MM-TCR-4 have been provided to address the potential for unanticipated resources to be uncovered during Project construction activities.

Mitigation Measures

MM-TCR-1 Worker Awareness Training

Purpose: To help Project personnel identify and avoid impacts to tribal cultural resources during construction activities.

Requirement: Prior to initiating construction, the Permittee shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and tribal representative, culturally affiliated with the Project area. The qualified archaeologist and tribal representative shall conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) for all construction personnel, to include the following:

1. Review of the type of artifacts that may be uncovered;
2. Examples of common archaeological artifacts that must be examined;
3. Review of why archaeological resources may be significant to archaeologists or Native Americans;
4. Procedures to notify interested parties in the event of a discovery, including tribal representatives culturally affiliated with the Project area;
5. Reporting requirements and responsibilities of the construction workers;
6. Procedures for recording, evaluating, and mitigating unanticipated discoveries; and
7. Procedures to be followed in the event of the discovery of a human burial or burial-associated artifacts.

Documentation: The qualified archaeologist and tribal representative shall prepare a memorandum documenting completion of the training, noting the topics covered, and providing a list of attendees, and submit it to the Planning Division.

Timing: The required worker awareness training shall be completed prior to initiation of ground disturbance. The archaeologist and tribal representative shall submit their memorandum to the Planning Division within three days of completing the training.

Monitoring and Reporting: The Planning Division shall review the memorandum documenting the completion of the training, and shall maintain such documents in the Project file.

MM-TCR-2 Monitoring During Ground Disturbance

Purpose: To avoid impacts to tribal cultural resources during construction activities.

Requirement: The Permittee shall retain an archaeological monitor, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and Native American monitor, culturally affiliated with the Project area, to observe the first (5) days of ground-disturbing activities which include excavating, digging, and/or trenching that will result in the disturbance of terrace

and alluvium/terrace deposits. Monitoring shall continue until all (5) days, consecutive or nonconsecutive, of ground-disturbing activities are completed.

If cultural resources are encountered, the monitors shall have the authority to request ground disturbing activities cease within 60-feet of the discovery to assess and document potential finds in real time. Both the archaeological monitor and Native American monitor shall have the opportunity to assess the find.

Should the find be deemed significant, the archaeological monitor and tribal monitor shall observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

Documentation: If no cultural resources are discovered, the archaeological monitor and Native American monitor shall submit a brief letter to the Planning Division, stating that no resources were discovered and that the monitoring activities have been completed. Should significant cultural resources be found, the archaeological and Native American monitors shall then provide a weekly report to the Planning Division summarizing the activities during the reporting period.

Timing: The archaeological monitor and Native American Monitor shall observe the first (5) days of ground-disturbing activities which include excavating, digging, and/or trenching that will result in the disturbance of terrace and alluvium/terrace deposits. Monitoring shall continue until all (5) days, consecutive or nonconsecutive, of ground-disturbing activities are completed.

Monitoring and Reporting: The Planning Division shall review the memorandum and weekly reports (if applicable) from the archaeological monitor and Native American monitor, and shall maintain such documents in the Project file.

MM-TCR-3 Discovery of Resources During Ground Disturbing Activities

Purpose: To avoid impacts to tribal cultural resources during construction activities.

Requirement: If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:

1. Cease operations within the immediate vicinity of the find (within a 60-foot buffer) and assure the preservation of the area in which the discovery was made;
2. Notify the Planning Director in writing, within three days of the discovery;
3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and

5. Implement the agreed upon recommendations.

Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: If archaeological or historic artifacts are uncovered during ground disturbing activities, the Planning Director shall be notified in writing within three days. The report prepared by the County-approved archaeologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the archaeologist's report (if applicable), and shall maintain such documents in the Project file.

MM-TCR-4 Inadvertent Discovery of Human Remains

Purpose: To avoid impacts to human remains during construction activities.

Requirement: If any human burial remains or funerary objects are encountered during ground disturbance or construction activities, the Permittee shall:

1. Cease operations within the immediate vicinity of the find (within a 100-foot buffer of the find) and assure the preservation of the area in which the discovery was made;
2. Immediately notify the County Coroner and the Planning Director;
3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
    a. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.
4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
5. Implement the agreed upon recommendations.

Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find.

Documentation: If human burial remains or funerary objects are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the resource.

Timing: If human burial remains or funerary objects are uncovered during ground disturbing activities, the Planning Director and County Coroner shall be notified immediately. The report prepared by the County-approved archaeologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the archaeologist's report (if applicable), and shall maintain such documents in the Project file.

Level of Significance After Mitigation

With implementation of the mitigation measures identified above, Project impacts would be less than significant.

c) Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. As discussed above, the Project's impacts to tribal cultural resources would be less than significant with implementation of the identified mitigation measures. Like the Project, each related project would be assessed for the potential to encounter tribal cultural resources, and if necessary, would implement mitigation measures. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.Q UTILITIES AND SERVICE SYSTEMS

A. WASTEWATER

This section analyzes the Project's potential impacts on wastewater collection and treatment facilities and infrastructure, including whether existing infrastructure has sufficient capacity to serve the Project. The information and analysis presented below are based in part on the following source, which is included as Appendix K-1 of this Draft EIR:

K-1 Utility Infrastructure Technical Report: Water, Wastewater, and Energy, KPFF Consulting Engineers, January 2025.

1. Regulatory Setting

a) State

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallons per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

b) Local

i) City of Simi Valley Sewer System Management Plan

The City's Collections Section operates, maintains, and monitors the sewer system to assure sewage is safely and properly conveyed from nearly 40,000 lateral connections to the City's Water Quality Control Plant.

Sewer System Management Plans are state-mandated requirements for California's public collection system agencies that own or operate sanitary sewer systems greater than one mile in length. The purpose of these plans is to:

- Facilitate proper funding and management of sanitary sewer systems.
- Reduce sanitary sewer overflows.
- Protect public health and the environment.

- Improve the overall maintenance and operation of sewer systems and sewage lift stations.[1]

ii) City of Simi Valley Municipal Code

Title 6, Chapter 13 of the Simi Valley Municipal Code sets forth uniform requirements for direct and indirect use of the wastewater collection and treatment system of the City to comply with all applicable federal and state standards required by the Clean Water Act of 1977, and all related and applicable federal, state, or local regulations and grant conditions, as they are now constituted, or as they may hereafter be amended or recodified. The objectives of this chapter are:

- To prevent the introduction of pollutants into the publicly owned treatment works (POTW) that will interfere with its operation;
- To prevent the introduction of pollutants into the POTW that will pass through the POTW, inadequately treated, into receiving waters, or otherwise be incompatible with the POTW
- To protect both POTW personnel, who may be affected by wastewater and sludge in the course of their employment, and the public;
- To promote reuse and recycling of industrial wastewater and sludge from the POTW;
- To provide for equitable distribution of the total cost of the City's sewerage system and all related programs through the establishment of fair and equitable fees, charges, and penalties;
- To regulate direct and indirect users of the City's sewerage system through the issuance of permits to certain nondomestic users and through enforcement of general requirements for all other users;
- To provide for monitoring and enforcement activities; and
- To enable the City to comply with its National Pollutant Discharge Elimination System (NPDES) Permit, sludge and/or biosolids use and disposal requirements, and any other federal, state, or local laws to which the POTW is subject.

2. Environmental Setting

a) Existing Conditions

The City provides sanitary sewer services to the Project Site. Simi Valley serves an estimated 40,000 lateral connections, providing conveyance to the City's Water Quality Control Plant (WQCP). The City maintains approximately 380 miles of sewer line, 7,500 manholes, and 3 lift

[1] City of Simi Valley – Sanitation Services – Operations: Collection & Treatment; https://www.simivalley.org/departments/public-works/sanitation-services/operations-collections-treatment; accessed January 14, 2025.

stations that transport wastewater from residential and commercial properties to the wastewater treatment plant. The City serves a population of approximately 127,000. The system's average daily flow is currently approximately 7.9 million gallons per day (MGD).[2] The WQCP treats an estimated 10 million gallons per day (MGD) and has a dry weather design capacity of 12.5 MGD.[3]

The AJU campus is served by a private sanitary sewer network. Based on a review of Simi Valley sewer infrastructure, it is likely that this network connects to the public main at the intersection of Peppertree Lane and Guardian Street. Downstream of the likely connection consists of 12-inch ductile iron piping with an intended design slope of 0.4 percent.[4] The City's sewer design manual specifies that sewers 12-inch and larger shall be designed to flow two-thirds full at peak flow rate.[5] This suggests a design capacity in the sewer main of approximately 1.15 MGD, or 798 gpm.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Require or result in the relocation or construction of new or expanded wastewater treatment, the construction or relocation of which could cause significant environmental effects.

b) Project-Specific Impacts

Impact WW-1: **Existing wastewater treatment capacity could accommodate the Project, and the relocation or construction of new or expanded wastewater treatment would not be necessary. Therefore, Project impacts related to wastewater would be less than significant.**

As indicated in the Sewer Availability letter provided for the Project (refer to Exhibit 3 in the Utility Infrastructure Technical Report included in Appendix K of this Draft EIR), the City has indicated that capacity exists both in the trunk mainlines and wastewater treatment plant to serve the Project. The City's wastewater collection system has an average flow rate of approximately 7.8 mgd with a design capacity for 12.5 mgd. The WQCP is located on 33 acres in the western end of Simi Valley and has capacity to treat approximately 10 MGD at the tertiary level of treatment.[6] The peak domestic water demand of the Project is estimated to increase by approximately 8,363 gallons to 130,888 gallons per day when compared to existing demand. This increase represents an increase in discharge to the sanitary sewer system of approximately 8.6 percent, and

2 Simi Valley 2019 Sanitary Sewer Management Plan, Page 1-2.
3 California Regional Water Quality Control Board, https://www.waterboards.ca.gov/losangeles/board_decisions/tentative_orders/individual/npdes/Simi_Valley_WQCP/SimiValleyWQCPNPDESTentativeNPDESPermit9-18-2019.pdf; accessed January 14, 2025.
4 Sewer Gravity Map, Simi Valley, https://simivalley.maps.arcgis.com/home/webmap/viewer.html?webmap=29fede7e15db4be8b7921525d160ccce, accessed January 14, 2025.
5 Manual and Standard Plans for the Design and Construction of Sanitary Sewerage Facilities, p 14.
6 Ventura County 2040 General Plan, Chapter 7 (Public Facilities, Services, and Infrastructure), September 2020.

approximately 0.38 percent of the current available capacity to the WQCP. This represents a nominal increase which, as indicated in the Sewer Availability Letter, can be accommodated by the sewer purveyor. As such, it is anticipated that the Project would not result in a significant impact to the sewage treatment facility or trunk mainline system.

The Project would require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main, if required. The Project would be required to obtain a Will Serve Letter from the City. While it is understood that the trunk main infrastructure and treatment plant are unlikely to be affected by the Project, part of the Project permitting process would require determining the demand on the public infrastructure into which the Project would directly connect, and whether capacity exists at that point to accommodate the Project. If it is determined that upgrades are necessary, such work would be subject to the permitting requirements of the Authority Having Jurisdiction. A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Temporary sewer bypass plans would be implemented to prevent the unintended spillage of existing sewer flows. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e. months) and would cease to occur once the installation is complete. As the increase in sewer flow is anticipated to be nominal and can be accommodated by existing infrastructure, Project impacts on sewage collection and treatment facilities would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

Implementation of the Project combined with the related projects could increase the need for wastewater treatment. For each cumulative project, the applicable jurisdiction, as part of the building permit process, would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the cumulative project's wastewater flows. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the developer would be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. Each cumulative project would also pay any required sewer connection fees. As described above, the Project would require construction of new on-site infrastructure to serve the new buildings, which would be

limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main, if required. As the Project's increase in sewer flow is anticipated to be nominal and can be accommodated by existing infrastructure, Project impacts on sewage collection and treatment facilities were determined to be less than significant. Thus, the Project does not have the potential to contribute to any potential cumulative wastewater impacts, and cumulative impacts would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

B. WATER

This section evaluates the Project's potential impacts on water supply and determines whether the Project would require or result in the construction of new conveyance infrastructure, the construction of which would cause significant environmental effects. The information and analysis presented below are based in part on the following sources, which are included as Appendices K-1 and K-2 (respectively) of this Draft EIR:

K-1 Utility Infrastructure Technical Report: Water, Wastewater, and Energy, KPFF Consulting Engineers, January 2025.

K-2 Conditional Engineering Analysis and Information for Water Availability Letter, Water Resource Engineering Associates, July 29, 2024.

1. Regulatory Setting

a) State

i) California Urban Water Management Plan

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000-acre feet per year (afy) of water to customers.

ii) Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221–required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[7] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

iii) Senate Bill X7-7—Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[8] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[9] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[10]

iv) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[11] SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability and protect existing surface water and groundwater rights. SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

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7 California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.
8 State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, updated April 4, 2017.
9 State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.
10 State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.
11 California Department of Water Resources, SGMA Groundwater Management. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed January 14, 2025.

v) California Code of Regulations

A. Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gpm at 80 psi; and lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[12]

B. CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures, as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

C. Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2022.

D. Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued. Cities and water districts throughout the state are required to report their water use each month and ban wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

E. Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. The Order lists commonsense measures

[12] California Code of Regulations, Title 20, Section 1605.3(h), https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm, accessed January 14, 2025.

Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress.

b) Regional

i) Metropolitan Water District

The Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the Calleguas Municipal Water District.

ii) 2020 Urban Water Management Plan

The MWD's 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[13] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions; i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 Regional UWMP (RUWMP).[14] The analysis in the 2020 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[15] In the 2020 RUWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.[16]

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

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13 Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, May 2021.
14 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, p. 2-19.
15 Ibid.
16 Ibid.

A. 2020 Integrated Resources Plan

MWD's 2020 Integrated Resources Plan (IRP) is a long-range planning framework that evaluates how the region can maintain a reliable and sustainable water supply through 2045 under increasingly uncertain conditions. First developed in 1996, the IRP traditionally relied on a single "mid-range" forecast to guide supply and demand planning. However, by 2020, MWD recognized that this conventional approach could no longer capture the growing variability in imported water supplies, hydrologic cycles, climate change impacts, regulatory uncertainty, economic fluctuations, and demographic shifts. As a result, the 2020 IRP shifted to a scenario-planning model, allowing MWD to analyze multiple plausible futures rather than assuming one likely outcome. This approach better accounts for emerging risks, including reductions in Colorado River and SWP supplies, extreme drought, and constraints affecting portions of the service area that depend heavily on Northern California imports.

Under this expanded planning method, MWD developed four future scenarios that tested different combinations of supply reliability, climate conditions, regulatory environments, population growth, and economic trends. By modeling these variables, MWD evaluated how available imported supplies, local resources, conservation, recycling, storage, and flexible transfer programs might perform over time. These analyses revealed potential supply-demand gaps in several plausible futures, particularly those involving reduced imported supplies and medium-to-high water demand. In some scenarios, MWD concluded that additional core supplies and flexible supplies, along with expanded storage capacity, would be needed to avoid long-term shortfalls. Only the most optimistic scenario, involving relatively stable imported supplies and low demand, suggested the region could meet future needs without major new investments. The plan also underscored that parts of the service area dependent on the SWP face elevated reliability challenges under decreasing SWP allocations.

The 2020 IRP does not function as a fixed list of projects but as a decision-support framework for ongoing investment, policy development, and regional coordination. It helps Metropolitan and its member agencies evaluate the reliability, cost, adaptability, and environmental effects of potential projects, including new local supplies, recycling, groundwater replenishment, conservation programs, transfers, and additional storage. The IRP's needs assessment phase, adopted in 2022, now informs a broader adaptive planning program called the Climate Adaptation Master Plan for Water (CAMP4W), which integrates climate science, water resources planning, and financial and infrastructure strategy. Together, the IRP and CAMP4W aim to enhance long-term water reliability by prioritizing flexible strategies that can be adjusted as conditions evolve.

Overall, the 2020 IRP represents a significant strategic shift for MWD, acknowledging that Southern California's water future cannot be reliably planned through static forecasting. Instead, it adopts a dynamic and resilient approach that recognizes uncertainty as a central planning factor. By exploring multiple possible futures, identifying risks, and outlining the potential scale of new supply and storage needs, the plan establishes a foundation for long-term regional resilience in the face of climate change, hydrologic variability, and evolving regulatory demands.

B. Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[17]

C. Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

D. Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[18] The allocation period covers 12 consecutive months from July of a given year through the following June.

[17] Water Surplus and Drought Management Plan, Report No. 1150, 1999.
[18] Metropolitan water District, 2015 Urban Water Management Plan, p. 2-21.

c) Local

i) Calleguas Municipal Water District 2020 Urban Water Management Plan

Calleguas' 2020 Urban Water Management Plan (UWMP) has been prepared in compliance with the California Water Code (CWC). This Executive Summary satisfies the requirement of CWC Section 10630.5 to include a simple lay description of information necessary to provide a general understanding of the plan, including a description of Calleguas' water supply, as well as its needs, strategies, and potential challenges for the foreseeable future. This plan provides assessment of Calleguas' water service reliability, describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategy and schedule, and other relevant information and programs. In addition to the water reliability assessments, the plan includes an evaluation of frequent and severe periods of droughts, as described in the Drought Risk Assessment, and the preparation and adoption of a Water Shortage Contingency Plan (WSCP). Calleguas operates as a member agency of Metropolitan. Metropolitan provides Calleguas with imported water supplies, which Calleguas in turn distributes on a wholesale basis to its retail water purveyors. All factors described for Metropolitan's Water Reliability Assessment (WRA) for its 2020 UWMP can be directly applied to the Calleguas WRA as the District is fully dependent on Metropolitan for its water supply. The information included in Calleguas' 2020 UWMP represents the most current and available planning projections of supply capability and demand forecasts developed through a collaborative process with Metropolitan and the District's purveyors.[19]

As the Project's water purveyor, Brandeis-Bardin Mutual Water Company (BBMWC), is solely supplied by the Calleguas Municipal Water District, it is understood that it is effectively bound to the requirements of this UWMP.

Section 1.3.6 of the Ventura County Waterworks Manual establishes the requirement for a Water Availability Letter (WAL) as part of the development review process. Under this section, applicants must demonstrate that the water purveyor serving the project has sufficient long-term supply and adequate distribution capacity to meet the demand generated by the proposed development, in addition to existing and planned commitments within its entire service area. The WAL must be prepared in accordance with the procedures of the Waterworks Manual and is intended to confirm both the reliability of water supplies and the adequacy of conveyance infrastructure. This requirement ensures that new projects are consistent with County standards for water resources management and that growth does not outpace the ability of local agencies to provide safe and reliable water service.

2. Environmental Setting

a) Existing Conditions

BBMWC is responsible for providing water supply to the Project Site while complying with County, State, and Federal regulations. BBMWC, as a water purveyor, is a purchaser of water from the

[19] *Calleguas Municipal Water District 2020 Urban Water Management Plan, Executive Summary, June 2021.*

Calleguas Municipal Water District. BBMWC is wholly supplied through a six-inch water connection capable of supplying 1,000 gallons per minute. This service is responsible for filling BBMWC's 608,000-gallon Main Reservoir. Water from this reservoir is then drawn through two booster pump stations (understood to be limited to 160 gallons per minute) to supply the 300,000-gallon House of Book (HOB) Reservoir. These reservoirs serve the campus' two pressure zones. Additionally, BBMWC provides fire infrastructure to serve the AJU campus through a series of water mains and fire hydrants. The fire flow requirements for the site are a flow of 1,250 gallons per minute for a duration of 2 hours. This corresponds to a total volume of 150,000 gallons, which can be supplied fully from either reservoir in typical conditions.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Have insufficient water supplies to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

b) Project-Specific Impacts

Impact WTR-1: The Project's demand for water supply could be accommodated by existing supplies. Therefore, Project impacts related to water supply would be less than significant.

The Project is anticipated to require the construction of new, on-site water distribution lines to serve the proposed new buildings and facilities. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below the surface and would be limited to on-site water distribution, and minor off-site work associated with connection to the public main, if required. Further, BBMWC would be notified in advance of any ground disturbance activities to avoid water lines and disruption of water service. A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase.

The analysis conducted for the Project indicates that the BBMWC's water supply infrastructure consists generally of the following:

- Zone 1: Zone 1 consists of an approximately 608,000-gallon Main Reservoir which is supplied by a 6-inch Calleguas Municipal Water District (CMWD) water meter, capable of delivering 1,000 gallons per minute (gpm) of water
- Zone 2: Zone 2 consists of an approximately 300,000-gallon House of Book (HOB) Reservoir, which is supplied by two booster stations, which is supplied from the Main Reservoir by two pump stations:

- Booster Pump Station #1 is located at the Main Reservoir and can supply 300 gpm to fill the HOB Reservoir.
- Booster Pump Station #2 is located between the Main and HOB Reservoirs and can supply 160 gpm to fill the HOB Reservoir.

BBMWC, as retail customer of CMWD, would be capable of providing a permanent water supply of up to 1,000 gpm, and the Project would be supplied by the HOB Reservoir, which has a storage volume of approximately 300,000 gallons and recharge capacity of 230,400 gallons per day. It is estimated that the Project's peak demand of 285 gpm and 130,888 gallons per day (compared to the existing condition peak demands of 264 gpm and 122,525 gallons per day) could be accommodated through Zone 2. The Project has also obtained a Will Serve letter, which is included as Appendix K-2 of this Draft EIR, indicating that service can be provided to the Project. Therefore, Project impacts with respect to water supply would be less than significant.

The fire flow requirements for the Project (as determined by the International Fire Code) are a flow rate of 1,250 gpm for a minimum duration of 2 hours (150,000 gallons). As this flow rate exceeds the supply available to the water system (100,000 gpm), it is likely that the fire flow would be supplied by the HOB reservoir. As this reservoir is designed to maintain a storage capacity of 300,000 gallons, it is understood that the water purveyor is capable of supplying the necessary fire flow volume. To meet fire flow requirements, the Project includes the replacement of approximately 1,655 linear feet of 6-inch water main piping with 8-inch PVC water main piping. These improvements would allow the system to meet the VCFPD requirements. Therefore, Projects impacts with respect to fire flow would be less than significant.

Based on all of the above, the Project's water supply could be accommodated via existing supplies and infrastructure. Therefore, Project impacts related to water supply would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

As described above, the Project's water supply can be accommodated via existing supplies and infrastructure, and Project impacts were therefore determined to be less than significant. Development of the Project in conjunction with the related projects would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to review of the applicable jurisdiction to assure that the existing public utility facilities would be adequate to meet the water demands of each project. Individual projects would be required to improve facilities where appropriate. As the Project's water demands would be accommodated by existing supply and infrastructure, Project impacts with respect to water were

determined to be less than significant. Thus, the Project does not have the potential to contribute to any potential cumulative water impacts, and cumulative impacts would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

C. SOLID WASTE

This section of the Draft EIR provides an analysis of the Project's potential impacts on solid waste facilities. The analysis describes existing solid waste facilities and their associated capacities, estimates the amount of solid waste that would be generated during construction and operation of the Project, and evaluates whether existing and planned solid waste facilities could accommodate the estimated solid waste generated by the Project.

1. Regulatory Setting

a) Federal

i) Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) is the nation's primary law governing the disposal of solid and hazardous waste. The U.S. Environmental Protection Agency (EPA), Office of Resource Conservation and Recovery, implements RCRA, which sets national goals for reducing the amount of waste generated and ensuring that wastes are managed in an environmentally sound manner. The solid waste programs encourage states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling and promote the safe disposal of municipal waste.

b) State

ii) California Integrated Waste Management Act (Assembly Bill 939)

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. AB 939 required that jurisdictions implement programs to achieve 25 percent diversion of solid waste from landfill disposal by 1995, and 50 percent diversion by January 2000. The act also requires cities and counties to adopt a Source Reduction and Recycling Element (SRRE) of their Waste Management Plans to describe actions to achieve waste reduction goals. The purpose of the SRRE is to describe how each jurisdiction will meet the State-mandated diversion requirements. The SRRE for each locality is the basis for each county's Integrated Waste Management Plan (IWMP).

iii) California Solid Waste Reuse and Recycling Access Act (Assembly Bill 1327)

The California Solid Waste Reuse and Recycling Access Act of 1991, mandates that local jurisdictions adopt a model ordinance requiring that development projects provide an adequate storage area for the collection and removal of recyclable materials. The sizes of these storage areas are to be determined by the appropriate jurisdictions' regulations. If no regulations exist within the jurisdiction, the CalRecycle model ordinance takes effect.

iv) Construction and Demolition Waste Materials Diversion Requirements (Senate Bill 1374)

Construction and demolition (C&D) Waste Materials Diversion Requirements were enacted in 2002. Senate Bill (SB) 1374 seeks to assist jurisdictions with diverting their C&D waste material, and it also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of C&D waste from landfills by 2004, for voluntary use by California jurisdictions. CalRecycle adopted its model ordinance in March 2004. SB 1374 dictates that jurisdictions include a summary of the progress made in diverting C&D waste in their annual AB 939 report.

c) Local

i) Ventura County General Plan

The County's General Plan contains the following policies related to solid waste:

PFS-5.3 Solid Waste Capacity

The County shall require evidence that adequate capacity exists within the solid waste system for the processing, recycling, transmission, and disposal of solid waste prior to approving discretionary development.

PFS-5.9 Waste Reduction Practices for Discretionary Development

The County shall encourage applicants for discretionary development to employ practices that reduce the quantities of wastes generated and engage in recycling activities to further reduce the volume of waste disposed of in landfills.

2. Environmental Setting

a) Existing Conditions

The County manages the collection and disposal of solid and hazardous waste in the unincorporated area. The County is focused on reducing waste, preventing pollution, and promoting sustainable management of waste materials. The County must also comply with the California Integrated Waste Management Act. The County maintains a Countywide Integrated Waste Management Plan (CIWMP), which provides an assessment of the County's goals and objectives, issues and problems identified in the incorporated and unincorporated areas of the county, summary of waste management programs and infrastructure, existing and proposed solid waste infrastructure, and description of the steps that the County will take to achieve the outlined goals.

3. Impact Analysis

a) Thresholds of Significance

A project could have a significant impact if the project would:

a) Have a direct or indirect adverse effect on a landfill such that the project impairs the landfill's disposal capacity in terms of reducing its useful life to less than 15 years.

b) Be inconsistent with the applicable General Plan Goals and Policies for Item 29c of the Initial Study Assessment Guidelines.

b) Project-Specific Impacts

Impact SW-1: **The Project would not impair landfill capacity such that it would reduce the useful life to less than 15 years. Therefore, Project impacts related to landfill capacity would be less than significant.**

During the Project's construction phase, the Project would be required to comply with the State's C&D Waste Materials Diversion Requirements, which would divert much of the construction debris from landfill disposal and to a recycling facility. During operations, the Project would result in an increase of approximately 0.05 tons of solid waste per day.[20] As required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Because the County currently exceeds the minimum disposal capacity required by state PRC, the Project would have less than a significant project-specific impacts upon Ventura County's solid waste disposal capacity.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact SW-2: **The Project would be consistent with the applicable General Plan goals and policies related to solid waste. Therefore, Project impacts related to this issue would be less than significant.**

The Project Site is located within the County and would be subject to federal, state and County regulations. In accordance with CALGreen Sections 4.408 and 5.408, the Board of Supervisors approved Ventura County Ordinance 4590 on December 7, 2021. This ordinance regulates solid waste collection, disposal, and recycling within unincorporated areas of the County, and requires all discretionary projects that include construction and/or demolition activities to reuse, salvage, recycle, or compost a minimum of 65% of the solid waste generated by their project. Public Works

[20] 100 new campers x 1 pound of solid waste per day = 0.05 tons per day. Solid waste generation source: CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed January 27, 2025.

Agency-Integrated Waste Management Division's construction and demolition Waste diversion program (Form B Recycling Plan/Form C Report) ensures this 65 percent diversion goal is met prior to issuance of a final zoning clearance for use inauguration or occupancy, consistent with the Ventura County General Plan's Solid and Hazardous Waste Policies PSF-5.3 and 5.9. The Project would comply with these requirements. Therefore, the Project would have less than significant impact with respect to the Ventura County General Plan's goals and policies for solid waste disposal capacity.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

c) Cumulative Impacts

The solid waste generated by the Project and the related projects would represent only a fraction of the available capacity that could be accommodated at the landfills serving them. Similar to the Project, the related projects would be required to participate in regional source reduction and recycling programs pursuant to the State's C&D Waste Diversion Requirements (during construction) as well as AB 939, which would further reduce the amount of solid waste to be disposed of at landfills. In addition, as described above, Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Therefore, Project impacts with respect to solid waste were determined to be less than significant. The Project does not have the potential to contribute to any potential cumulative solid waste impacts, and cumulative impacts would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

IV.R WILDFIRE

This section evaluates the potential impacts of the Project related to wildfire hazards. Specifically, this section addresses whether the Project would impair an adopted emergency response plan or evacuation plan; exacerbate wildfire risks due to the introduction of new structures, infrastructure, or activities in a high fire hazard area; require the installation or maintenance of infrastructure that may increase fire risk (such as roads or utility lines); expose people or structures to significant risk of loss, injury, or death involving wildland fires; or result in the uncontrolled spread of fire due to project design features, landscaping, or inadequate defensible space. The analysis considers the Project Site's location relative to State Responsibility Areas (SRAs), Very High Fire Hazard Severity Zones (VHFHSZs), local fire protection resources, and applicable regulatory frameworks, and identifies mitigation measures as necessary to reduce potential wildfire-related impacts.

Information and analysis included in this section is based in part on the following sources, which are included as Appendices M-1 and M-2 (respectively) of this Draft EIR:

M-1 Wildfire Technical Study Camp Alonim Expansion, Envicom Corporation, November 2024.

M-2 Fire Access Exhibit, Stantec Consulting Services Inc., April 2, 2025

1. Regulatory Setting

a) Federal

The Project Site is located within a State Responsibility Area (SRA) for purposes of fire protection (i.e., an area where the state government is responsible for wildfire protection), and therefore, federal wildfire regulations do not apply to the Project Site or within the immediate area. The Federal National Incident Management System (NIMS) provides a shared vocabulary, systems, and processes to prevent, protect against, mitigate, respond to and recover from disaster, and is relevant should a wildfire event become extraordinary and require federal support. NIMS is intended to standardize response to emergencies involving multiple jurisdictions or multiple agencies and is complementary to the State Standardized Emergency Management System (SEMS). Both systems utilize the Incident Command System (ICS) as their core field operations protocol so that all parties are essentially speaking the same language.

b) State

i) California Fire Code

The California Fire Code (CFC), Part 9 of Title 24 of the California Code of Regulations (CCR), establishes statewide regulations for fire prevention, fire protection, and life safety in buildings and on properties. The CFC sets standards for building access, fire flow, fire protection systems, hazardous materials management, emergency planning, and other practices designed to

minimize the risk of fire and ensure effective emergency response. Local fire departments, such as the Ventura County Fire Department (VCFD), enforce the code and may adopt more stringent amendments tailored to local conditions, including requirements for fire hydrant placement, water supply, fire lanes, and defensible space.

California has also adopted Part 7 of the California Building Standards Code, known as the California Wildland-Urban Interface (WUI) Code, which complements the CFC by focusing specifically on areas where development meets or intermingles with wildland vegetation. The WUI Code requires ignition-resistant construction materials, ember-resistant vents, and defensible space measures to reduce wildfire risks. Together, the CFC and WUI Code provide a comprehensive framework for fire protection: the CFC establishes fire prevention and emergency response requirements, while the WUI Code strengthens building and site resilience in high fire hazard areas.

By requiring compliance with these statewide regulations, California ensures that both urban and wildland-interface communities are better protected from fire hazards, aligning local development with broader state goals for fire safety, hazard mitigation, and community resilience.

A. California Code of Regulations Title 14, Division 1.5

Title 14 of the CCR, Division 1.5, establishes the regulations for CAL FIRE and is applicable in all SRAs where CAL FIRE is responsible for wildfire protection. Title 14 of the CCR, Section 1270, et seq., establishes minimum standards for emergency access, fuel modification, setback to property lines, signage, and water supply. In Ventura County, the VCFD enforces these regulations on behalf of CAL FIRE, as VCFD operates under contract with CAL FIRE to provide wildfire protection and prevention services in the State Responsibility Areas (SRAs) of the county.

B. Fire Hazard Severity Zones

CAL FIRE uses Fire Hazard Severity Zones (FHSZs) to classify the anticipated fire-related hazard for SRAs. The classifications include Moderate, High, and Very High.[1] These fire hazard measurements considers vegetation, topography, weather, crown fire production, fire history, and ember production and movement.[2]

ii) Public Resources Code Section 4291

Public Resources Code Section 4291 regulates fuel management around a property. It states that a person who owns or controls a building or structure in or adjoining to forest, brush, or grass covered lands shall follow certain guidelines outlined in the code. At least 100 feet of defensible space is required. The owner of the property is liable for making these changes to protect

[1] CAL FIRE, Office of the State Fire Marshal, Fire Severity Zones, https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones, accessed June 18, 2024.

[2] Ibid.

habitable structures. The 100 feet is separated into two zones, with the closer zone, 30 feet out from the structure, being managed more intensively.

iii) California Strategic Fire Plan

The California Strategic Fire Plan (also called the Strategic Fire Plan for California) is a statewide, multi-year roadmap developed by CAL FIRE and other state partners to guide wildfire prevention, suppression, resource management, and community resilience efforts in light of worsening fire risk from climate change, expanding wildland-urban interface, and increasing fuel loads. One of its core goals is to protect lives, property, infrastructure, and natural ecosystems, while also maintaining healthy forests and landscapes that contribute to carbon sequestration and adaptation to shifting climatic conditions. The Plan lays out strategic priorities such as reducing ignition risk, treating fuels, restoring fire-adapted ecosystems (including through prescribed and cultural fire), improving evacuation and emergency response planning, and expanding collaboration among state, federal, tribal, local agencies, nonprofit and community stakeholders. It also provides for periodic unit-level fire plans (Unit Fire Plans), which break down local project-level goals and actions (fuel treatments, defensible space, community education, etc.) to meet the goals of the broader Plan. Additionally, the Plan integrates with complementary efforts such as Community Wildfire Protection Plans (CWPPs) and Pre-Fire Planning so that the strategy is applied at both the strategic/state level and locally.

c) Local

i) Ventura County Multi-Jurisdictional Hazard Mitigation Plan

The Ventura County Multi-Jurisdictional Hazard Mitigation Plan (Hazard Mitigation Plan) defines measures to reduce risks from natural disasters in the Ventura County planning area, including wildfires. The Hazard Mitigation Plan identified the following issues and risks associated with wildfires:

- Public education and outreach to people living in or near the fire hazard zones should include information about and assistance with mitigation actions such as defensible space and advance identification of evacuation routes and safe zones.
- Wildfires could cause landslides as a secondary natural hazard.
- Wildfire preparedness and response planning should emphasize being alert to any predictions of Santa Ana winds, which are significant contributors to wildfire in Ventura County.
- Climate change could exacerbate the wildfire hazard.
- Future growth into interface areas should continue to be managed.

- Area fire districts need to continue to train on wildland-urban interface events.
- Regional consistency of higher building code standards such as residential sprinkler requirements and prohibitive combustible roof standards.
- Firefighters in remote and rural areas are faced with limited water supply and lack of hydrant taps.
- Expand certifications and qualifications for fire department personnel.
- Ensure that all firefighters are trained in basic wildfire behavior, basic fire weather, and that all company officers and chief level officers are trained to the wildland command and strike team leader level.

ii) Ventura County General Plan

The Hazards and Safety Element of the County's General Plan contains the following goal and policies regarding wildfires:

HAZ-1.1 Fire Prevention Design and Practices

The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.

HAZ-1.2 Defensible Space Clear Zones

The County shall require adherence to defensible space standards, or vegetation "clear zones," for all existing and new structures in areas that are designated as Hazardous Fire Areas by the Ventura County Fire Protection District and High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection.

HAZ-1.3 Controlled Burns and Other Fire Prevention Measures

The County shall continue to recognize the role of fire in local ecosystems by supporting controlled burns and other fire prevention measures.

HAZ-1.4 Development in High Fire Hazard Severity Zones and Hazardous Fire Areas

The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE).

HAZ-1.5 Discouragement of Home-Building in Very High Fire Severity Zones

The County should discourage the building of homes in Very High Fire Severity Zones.

HAZ-1.6 Wildfire Risk Education

The County shall continue to develop and distribute educational materials and conduct educational outreach activities informing the public about wildfire risk and protection strategies.

HAZ-1.7 Post-Fire Community and Natural Resource Recovery

The County shall assemble an interagency team as needed to maintain response plans and coordinate the management of resources following wildfire events.

HAZ-1.8 Federal Fire Risk Management

The County should collaborate with the federal agencies to better manage fuel loads on federally-owned or managed lands.

iii) Ventura County Fire Code

Ventura County Fire Protection District (VCFPD) adopted Ordinance 32, updating Chapter 49 of the Fire Code (effective January 1, 2023), which incorporates local amendments to California's State Fire Code / International Fire Code with stricter requirements for defensible space, fuel modification, landscaping, and vegetation management. Key provisions include requiring a 100-foot defensible space around structures in SRAs, Very High Fire Hazard Severity Zones, or designated Wildland-Urban Interface (WUI) areas.[3] The landscaping around new buildings and major landscape revisions must come with landscape and fuel modification plans that delineate zones and specify plant types, irrigation, and maintenance. Under the amendments, there's no "grandfathering" for existing defensible space zones unless state law or the Code explicitly allows it; existing properties may need to retrofit vegetation, spacing, and fuel loading to comply. Other enhancements include tightening rules around combustible materials (e.g. decks, wood piles, mulch) in close zones, building setbacks, and requirements for fencing near structures in WUI areas. These amendments reflect VCFD's effort to reduce wildfire risk, improve ember resilience, protect fire-fighting access, and ensure property owners maintain fuel conditions that reduce fire spread risk.

iv) Ventura County Fire Department

The Project Site is located within the boundaries of the Ventura County Fire Protection District, which operates the Ventura County Fire Department (VCFD). The VCFD provides firefighting

[3] VCFPD adopted Ordinance 34, which updates the 2025 California Fire Code, effective January 1, 2026. However, because the applicant has submitted plans for plan check prior to this date, the 2022 California Fire Code that was adopted under Ordinance 32 will apply.

services to the site. The VCFD created the Fire Hazard Reduction Program to coordinate fire prevention efforts within VHFHSZ areas, acknowledging "A working partnership between property owners, their neighbors, and the Ventura County Fire Department is the best defense against disastrous fires." The Wildland Fire Action Plan is the guidance document produced by the VCFD which provides education and direction to property owners within VHFHSZs.

v) Ventura County Sheriff Office of Emergency Services, Emergency Operations Plan

This 2021 Ventura County Operational Area Emergency Operations Plan (EOP) is the County's preparedness document designed to be read, understood, and exercised prior to an extraordinary emergency. It designates the County as part of the SEMS and NIMS and clarifies each element of the emergency management organization and their responsibilities in the maintenance of appropriate and current Standard Operating Procedures resource lists and checklists that detail how assigned responsibilities are performed to support implementation of the EOP to ensure an effective response during a major disaster. The EOP delineates the organization, framework, and command hierarchy for the County's response to major disasters.

2. Environmental Setting

a) Regional

According to the Hazards and Safety Element of the County's General Plan, portions of Ventura County are at very high risk for wildfire with high concentrations on the northern coast leading inland between the cities of Santa Paula and Ojai in central western Ventura County. Additional high fire Hazard Severity Zones, as designated by the California Department of Forestry and Fire Protection (CAL FIRE), occur along the northeastern portion of the County and continue inland toward Simi Valley and surrounding areas.

Given rising temperatures combined with changes in precipitation patterns, the County may continue to experience an increase in wildfire frequency and intensity as fuel loads become drier and more flammable. Wildfire also presents other health-related impacts associated with emissions of air pollutants during the combustion of organic fuels and other materials, such as particulates (soot and smoke), carbon monoxide, nitrogen oxides, and other substances that can be widely dispersed through a region and degrade air quality. Exposure to these air pollutants can cause acute (short-term) and exacerbate chronic (long-term) respiratory and cardiovascular illnesses, especially in vulnerable populations such as the elderly, children, and agricultural and outdoor workers.

Additionally, wildfire can cause direct and indirect damage to utilities and communication infrastructure, roads, and other public infrastructure. Direct exposure to fire can sever transmission lines, and heat and smoke can affect transmission capacity. Furthermore, fires can

cause acute damage to soil structure and moisture retention thus increasing susceptibility to erosion or landslides.

b) Project Site

The Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Subject Parcels. There are 117 existing structures associated with the camp, totaling approximately 208,000 square feet. Structural development on the campus includes an eclectic mix of rustic cabins and modern institutional structures. Vegetation at the camp consists of mustards, non-native grasses, oak woodlands, sycamore woodlands, sagebrush, and purple sage scrub. Much of the camp area has been cleared or disturbed. Meier Canyon Creek, which is part of the Arroyo Simi watershed, and the East Tributary of Meier Canyon Creek, bisect the developed portion of the camp. As shown on Figure IV.R-1, the Project Site is within a State Responsibility Area.

Local access to the campus is provided by Peppertree Lane, accessed from Tapo Canyon Road in Simi Valley. Within the campus, Peppertree Lane and High Road form a loop around the campus/camp facilities. The House of the Book access road extends northeast from the southern end of the loop and continues past as a secondary access road exiting at Hidden Ranch Drive. Emergency access to the campus is provided by Peppertree Lane primarily via Tapo Canyon Road, though Peppertree Lane may also be accessed from Guardian Street. Secondary emergency access is provided by the House of the Book access road which is connected to Los Angeles Avenue via Hidden Ranch Drive.

i) Project Site Wildfire Risk

The hillsides surrounding the campus are characterized by a mix of scrub, disturbed grassland, and oak woodland, with the northeast slopes dominated by grazed grasslands and the southwest slopes showing denser scrub and oak woodland south of Meier Canyon. These vegetation patterns are influenced both by slope orientation, with southwest-facing slopes receiving greater solar radiation, and by the site's long history of land use. Historical aerial photos reveal that much of the northeast hillside vegetation was removed by the late 1920s and that orchards were established in the valley by 1939, later cleared before 1959 when the AJU facilities were built. The legacy of these clearings remains visible, particularly in drought years, though the cleared areas are now maintained through mowing and cattle grazing to reduce wildfire risk. While the hillsides have burned in the past and will likely burn again, fuel management reduces the threat to the facilities, and north-facing slopes remain less susceptible to wildfire spread.

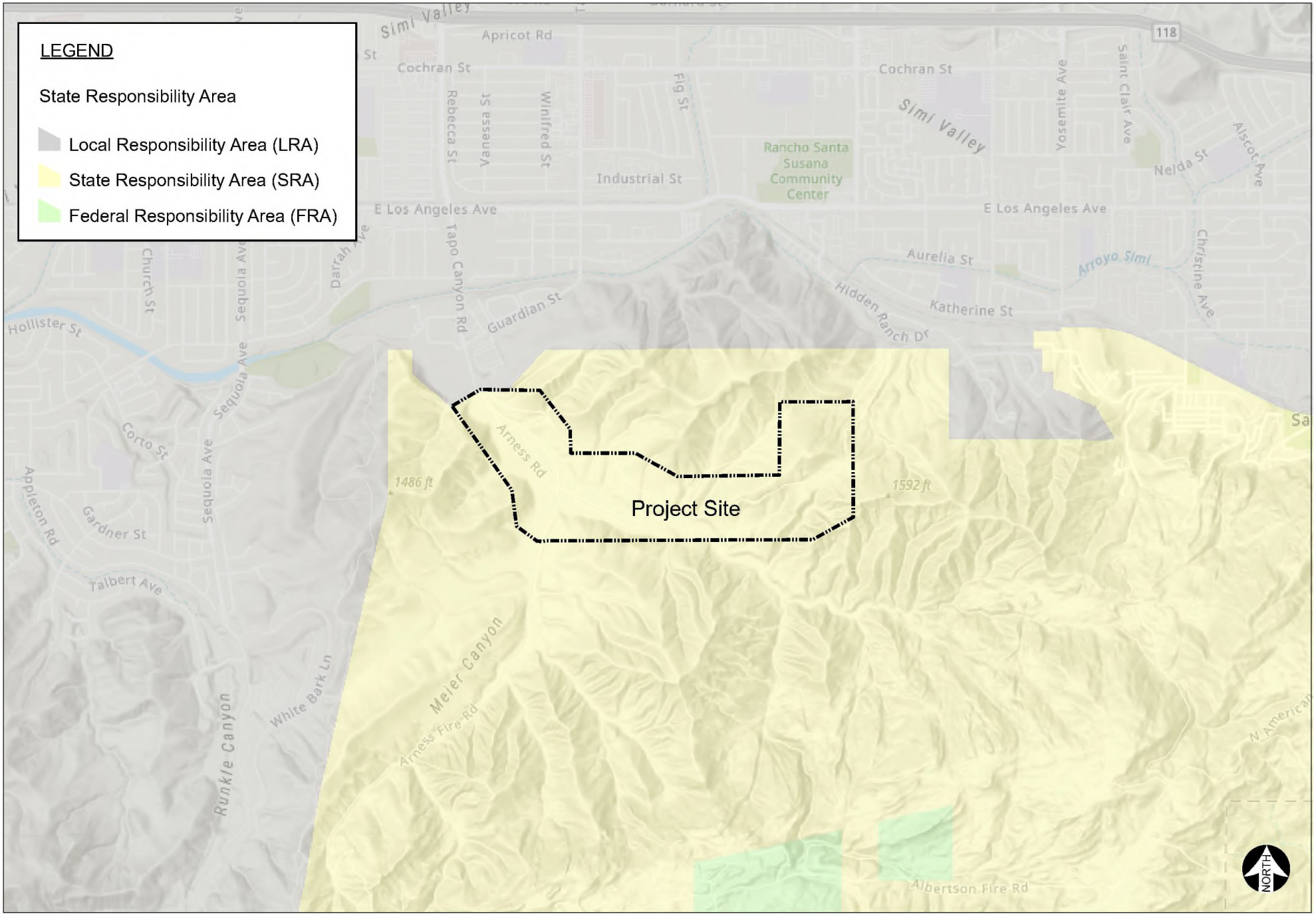


Figure IV.R-1
Responsibility Areas

Within the valley, fire behavior is naturally less aggressive due to reduced slope topography, though vegetation still poses a risk that is considered manageable. Blue gum eucalyptus trees, concentrated near the entrance and north of proposed new construction, represent a flammable element due to their bark and volatile oils, but maintenance practices such as bark removal and limb trimming minimize hazards. Other vegetation in the valley consists of native species, legacy landscaping, turf, and invasive plants, with landscaping risks largely limited to isolated pampas grass and palm trees that can be controlled. Regular maintenance of vacant and weedy areas further reduces fire concerns. Overall, while past land use created conditions that might not align with modern fire planning practices, ongoing maintenance and fuel management appear to effectively mitigate wildfire risks for the campus.

ii) Wildfire History at the Project Site

CAL FIRE records show that since 1898, 13 wildfires have come within a mile of the AJU campus, with only four reaching the grounds. Of these, just one, the 1967 Devonshire-Parker fire, burned a substantial portion of the campus, including the southern area and entrance gate. Other fires, such as the 1958 Parker, 1970 Clampitt, and 1992 Sequoia, reached the periphery but did not significantly impact the campus. The northern half of the campus and much of Meier Canyon have remained untouched by wildfire.

While the surrounding area is an active wildfire zone, the canyon itself, particularly the site of the AJU campus, has proven more defensible. This is partly due to active fire protection efforts and also to the natural setting of the campus. The campus is located in the valley at the base of hills, where fires lose intensity moving downslope and where fuel is limited by managed perimeters and irrigated landscaping. The valley's northwest–southeast orientation runs perpendicular to prevailing winds, reducing wind-driven fire risk. Both eastern and western approaches to the campus present natural barriers: wildfires cresting hills from the east or west would slow significantly upon encountering cooler, less combustible slopes. Combined with fuel modification zones and maintained vegetation, these factors make the campus more defensible even under Santa Ana wind-driven wildfire conditions.

A. AJU Wildfire Planning

AJU actively manages wildfire risk through a combination of maintenance, preventative measures, and formal emergency protocols. A full-time crew of 16 grounds staff, all living on site, handle landscaping and vegetation management, including brush clearance within 100 feet of structures, pruning trees, and removing bark duff from eucalyptus in compliance with VCFD requirements. VCFD Station 41 regularly assists with fire maintenance and uses the site for training, while cattle grazing on northeastern hillsides helps reduce fuel loads. Additional resources include an on-site bulldozer for fuel clearance and two large water reservoirs reserved for firefighting. Strict fire-safe rules prohibit smoking and outdoor cooking, while campfires are allowed only under controlled conditions at four designated pits, managed exclusively by AJU staff with water on hand and extinguished under supervision.

The campus operates under a comprehensive emergency response plan, *Emergency Preparedness and Procedures* (included in Appendix L-1), which sets out a clear chain of command, staff responsibilities, emergency codes, and communication protocols via walkie-talkies and designated radio channels. The plan includes evacuation routes and procedures. Past wildfire events, including the 2005 Topanga and 2006 Sequoia fires, demonstrate AJU's preparedness: staff informed residents and visitors, moved livestock, ensured reservoirs were full (608,000 and 300,000 gallons, respectively), and supported fire crews stationed on site. Together, these measures illustrate a proactive and layered approach to wildfire preparedness and response.

3. Impact Analysis

a) Thresholds of Significance

The analysis of wildfire impacts considers criteria identified in the CEQA Guidelines Appendix G Environmental Checklist for Wildfire.

i) Appendix G of the CEQA Guidelines

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the project would result in significant wildfire impacts if it would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan;
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
d) Expose people or structures to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

b) Project-Specific Impacts

Impact WF-1: With implementation of Mitigation Measure MM-FIRE-1, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and Project impacts would be less than significant.

There are no specific emergency response or emergency evacuation plans that pertain to the County or the Project Site. Rather, emergency response and evacuation proceedings are

conducted on a dynamic basis according to the framework established in the Sheriff Department's EOP, which integrates with the SEMS and NIMS. As the EOP is a planned framework for emergency response, the Project cannot impair it.

During Project construction, all equipment staging and worker parking would occur within the boundaries of the AJU campus. Construction material hauling vehicles would travel on Tapo Canyon Road, which is a five-lane arterial for much of its length, narrowing to a two- and three-lane arterial closer to Peppertree Lane. The road, within the City of Simi Valley, is designed to accommodate heavy truck traffic from the light industrial buildings to the north even at its narrowest point, and construction truck traffic would not significantly disrupt or block the road. Any necessary utility lines would be extended from existing utilities on-site, so there would be no need to place lines in Tapo Canyon Road. If encroachment into the public right-of-way would be necessary, work would be coordinated with the City through issuance of a roadway encroachment permit to provide adequate notification and a construction-phase traffic control plan, including warning signs, traffic cones, and/or flagmen, as necessary. Roads internal to the Project Site are private and would be kept free and clear of traffic by the Project proponent. As such, construction activities would not substantially impede emergency vehicle access or impair an emergency response plan or evacuation plan.

Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. All camp traffic is routed through a security gate where Peppertree Lane begins. Within the camp, Peppertree Lane splits into the "Low Road," which follows along the east side of the creek through the center of the camp, and the "High Road," which skirts along the hillside at the edge of the camp's developed area. As part of the Project, traffic associated with Camp Alonim would be directed along the High Road to the new Welcome Center parking lot. This routing would help to avoid interference with camp activities and conflicts with campers crossing the road to access facilities. In an emergency that impairs the primary access at the front security gate, evacuees would use a secondary egress point at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley via Hidden Ranch Drive. The VCFD requires turnouts be added to the access road (i.e., Peppertree Lane and the High Road) between Tapo Canyon Road and the proposed Welcome Center. Additionally, the VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. These improvements include:

- All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge.
- Electric gates shall be retrofitted with an auto-exit loop sensor.
- Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet).
- All existing buildings shall be required to meet the following defensible space standards:
    - Zone 0 (5-foot non-combustible zone).
    - Extended fuel reduction/thinning zones to 200 feet from buildings.

- The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.

According to the County's General Plan, evacuation decisions are complicated and directly impacted by changing conditions. Preparing static, pre-determined evacuation maps/routes are not effective as they do not consider unforeseeable conditions such as fire rates of spread, fuel modeling, wind, topography, resource availability, viable transportation routes and the population at risk to include individuals with access and functional needs in the impacted area. Wildfire conditions change and evolve rapidly in unpredictable ways. Hence, the County utilizes a robust emergency notification system to provide timely instructional information to residents in an emergency. The VC Alert emergency notification system is a local emergency notification system that is used to send messages to landline telephones, cellular telephones, teletypewriter/telecommunications device for the deaf (TTY/TTD) devices, fax, email, and instant messaging services. The VC Alert can send both text and recorded voice messages, and the text-to-speech engine is able to send notifications in multiple languages. When a wildfire poses a risk to life, property and/or the environment, the VC Alert system is used to send actionable evacuation information to residents to take action to save their lives. Every VC Alert message includes a phone number to the County Incident Information Hotline and the link to the VCEmergency.com webpage where residents can receive real-time incident information showing an interactive map of fire perimeters, road closures, evacuation shelters, and more. The Project would not interfere with this emergency response system.

The City of Simi Valley's emergency evacuation program is grounded in its SEMS Multi-Hazard Functional Plan (Emergency Operations Plan), which outlines the city's response protocols for natural disasters, technological incidents, and other crises. The city's Office of Emergency Services leads preparedness efforts, which focus on the principles of "Make a Plan, Build a Kit, Stay Informed," and maintains robust public notification systems, including VC Alert, AM 530 radio broadcasts, and social media outlets to disseminate evacuation orders, routes, and shelter locations. Ventura County further supports evacuations through Temporary Evacuation Points (TEPs) and coordinated messaging across jurisdictions.

AJU currently hosts up to 300-person events and three concurrent summer camps, bringing over 700 visitors and staff to the campus at once. The requested Conditional Use Permit (CUP) would increase camp enrollment by 100 and allow up to 1,000-person events six times per year. While this raises the statistical chance of a wildfire coinciding with an event, it would not alter the fundamental duties of emergency responders, who would still issue evacuation warnings or orders and access the site if necessary. As discussed in Section IV.M, Public Services – Fire, of this Draft EIR, AJU's Emergency Preparedness and Procedures Plan (included in Appendix L-1 of this Draft EIR) establishes command hierarchy, staff roles, communication protocols, and evacuation procedures, ensuring orderly responses. This includes procedures for a camp-wide evacuation of campers and staff by bus to the Rancho Santa Susana Recreation Center in Simi Valley as well as a plan to shelter in place if ordered to do so by the VCFD.

The facility has decades of experience managing events and coordinating traffic and may hire additional staff for parking without impairing emergency access. Evacuation from events consists of guests leaving the campus in their own vehicles through either the front security gate or through the back gate at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley. There is also a side gate on the Runkle side that can be used in case of emergency. Finally, similar to the plan to bus campers and staff off-site if needed, the same plan can be used if necessary to bus event attendees to an off-site location. Tapo Canyon Road and adjacent routes provide adequate capacity, and evacuation orders are managed by the Sheriff's Office of Emergency Services to avoid interference with emergency response. In the event of a fire starting on-site, AJU has the ability to control evacuation in an orderly fashion. If a fire threatens from off-site, evacuation would only occur under Sheriff's orders and with coordinated planning. Unlike a residential subdivision, the Project represents a seasonal use with limited occupancy, meaning potential wildfire-related evacuation impacts would be intermittent and manageable. Overall, the Project's expansion is not expected to substantially impair wildfire emergency response either on or off site.

For all of the reasons discussed above, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, Project impacts related to this issue would be less than significant.

Mitigation Measures

See Mitigation Measure MM-FIRE-1 in Section IV.M, Public Services – Fire, of this Draft EIR.

Level of Significance After Mitigation

Implementation of Mitigation Measure MM-FIRE-1 would ensure that the Project would not impair emergency evacuation, and this impact would be less than significant.

Impact WF-2: **While the Project would increase activity at the Project Site by increasing the number of campers, staff, and number of events, the Project would not exacerbate wildfire risks at the site. Additionally, the Project would implement Mitigation Measure HAZ-1 to ensure Project impacts related to wildfires would be less than significant.**

According to the California Board of Forestry and Fire Protection, the Project Site is within a State Responsibility Area. As discussed in Section II, Project Description, the camp has been operated on the Project Site since 1947, and there are currently 117 existing structures associated with the camp on the Project Site, totaling approximately 208,000 square feet. The Project includes the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures. In order to accommodate the proposed development, three housing trailers, two cottages, a garage, and one of the former cabins would be demolished. The new development would be located within the footprint of existing camp development and would be required to

comply with all applicable regulations for construction within a Very High Fire Hazard Severity Zone. In addition to the proposed physical improvements, the Project also includes an increase in camp attendance (by 100 campers) and an increase in the number and size of special events held at the Project Site.

However, the increase in camp attendance and number and size of special events would not exacerbate wildfire risks at the Project Site for a number of reasons. First, as discussed above and in Section IV.M, Public Services – Fire, of this Draft EIR, the camp maintains an Emergency Preparedness and Procedures Plan (included in Appendix L-1 of this Draft EIR), which establishes command hierarchy, staff roles, communication protocols, and evacuation procedures, ensuring orderly responses. This includes procedures for a camp-wide evacuation of campers and staff by bus to the Rancho Santa Susana Recreation Center in Simi Valley as well as a plan to shelter in place if ordered to do so by the VCFD. Second, the Project would implement Mitigation Measure MM-FIRE-1, which provides additional improvements that would be implemented at the Project Site to reduce the risk of wildfire. Finally, as discussed in Section IV.J, Hazards, of this Draft EIR, the Project would be required to implement Mitigation Measure MM-HAZ-1, which requires the Applicant to coordinate with the Fire Department and develop and implement appropriate site management and maintenance plans. Compliance with applicable zoning, building, and fire codes and implementation of Mitigation Measures MM-HAZ-1 and MM-FIRE-1 would ensure that the Project would not exacerbate wildfire risks. Therefore, Project impacts related to this issue would be less than significant

Mitigation Measures

See Mitigation Measure MM-HAZ-1 in Section IV.J, Hazards and Hazardous Materials, of this Draft EIR, and Mitigation Measure MM-FIRE-1 in Section IV.M, Public Services – Fire, of this Draft EIR.

Level of Significance After Mitigation

Implementation of Mitigation Measures MM-HAZ-1 and MM-FIRE-1 would ensure that the Project would not exacerbate wildfire risks, and this impact would be less than significant.

Impact WF-3: **The Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in impacts to the environment. No mitigation measures are required, and Project impacts would be less than significant.**

As described above, as part of the Project, the VCFD requires that the access road (i.e., Peppertree Lane and the High Road) include turnouts between Tapo Canyon Road and the Welcome Center. Additionally, the VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. These improvements are described above. Beyond these improvements,

the Project would not require the installation or maintenance of new infrastructure that may exacerbate fire risks or result in other impacts to the environment. Therefore, Project impacts related to this issue would be less than significant.

Mitigation Measures

No significant impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Impact WF-4: Implementation of Mitigation Measure MM-WF-1 would ensure that the Project would not expose people or structures to flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, and Project impacts would be less than significant.

The physical improvements associated with the Project (Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements around the new structures) would not worsen slopes in terms of steepness, nor would the Project result in changes in the stability of a slope or an increase in runoff (see Section IV.K, Hydrology and Water Quality, of this Draft EIR). As discussed in Section IV.H, Geology and Soils, of this Draf EIR, the Project Site does not contain slopes susceptible to landsliding and is not located within a seismic hazard zone. The slope areas to the east of the site are located within landslide hazard zones and are mapped "Potential Earthquake-Induced Landslides" with one area mapped as "Actual and Potential Landslides." However, according to the geotechnical investigation prepared for the Project Site (included in Appendix E-1 of this Draft EIR), the potential for earthquake-induced landsliding is considered low and these slopes are not considered to represent a landslide hazard to the site. Further, as discussed previously in this section, the Project would not exacerbate wildfire risks. Nevertheless, the Project would add additional structures and people to the Project Site, which could be susceptible to runoff and debris flow in the event of a fire on the surrounding slopes. Implementation of Mitigation Measure MM-WF-1, provided below, would require the preparation of a post-fire response plan to ensure that impacts to people and structures on the Project Site would not be exposed to landslides or flooding after a fire. With implementation of Mitigation Measure MM-WF-1, Project impacts related to this issue would be less than significant.

Mitigation Measures

MM-WF-1 Post-Fire Response Plan

Purpose: To reduce or eliminate the risk of exposure to post-fire landslides or slope instability.

Requirement: The Permittee shall develop a post-fire response plan to ensure that people and structures on the Project Site would not be subject to post-fire landslides and/or flooding in the

event that a fire occurs upslope from the cabins. The plan shall be approved by the VCFD, and shall include, but not be limited to, the following:

- Appropriate drainage facilities, including a plan to determine whether they are still operable post-fire and a plan to replace any damaged drainage facilities.
- Erosion and sediment control measures, such a mulch or barriers.
- Plan for seeding and revegetation with native plants.
- Plan for the maintenance of erosion and sediment control measures and replanted areas.

Documentation: The Permittee shall submit a post-fire response plan.

Timing: The post-fire response plan shall be developed and submitted for review and approval by the Planning Director and Fire Department prior to occupancy of the cabins. The post-fire response plan shall be implemented in the event that a fire burns the hillside above the cabins. Within three days of implementing the plan, the Permittee shall report to the Planning Director and Fire Department on the measures implemented.

Monitoring and Reporting: The Planning Division will retain a copy of the post-fire response plan in the Project file. In the event of a fire on the hillside above the cabins, the Planning Division and Fire Department may request that the Permittee implement the plan. The Planning Division and Fire Department may also conduct compliance inspections in accordance with Non-Coastal Zoning Ordinance Section 8114-3.

Level of Significance After Mitigation

With implementation of Mitigation Measure MM-WF-1, Project impacts would be less than significant.

c) Cumulative Impacts

Like the Project, it is likely that at least some of the related projects identified are located in either State or Local Responsibility Areas. However, with the exception of the cases associated with the Project Site itself, each of the related projects are located more than 1,000 feet away from the Project Site and therefore, are not likely to combine with the Project to result in cumulative impacts with respect to wildfires. Similar to the Project, the related projects are also subject to the fire safety and code requirements of the jurisdiction in which they are located, including the County of Ventura, City of Simi Valley, and City of Los Angeles. With full compliance with all applicable local and state rules and regulations, as well as implementation of site-specific recommendations for the related projects (if necessary), cumulative impacts related to wildfires would be less than significant.

Mitigation Measures

No significant cumulative impacts have been identified, and no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts would be less than significant.

V. ALTERNATIVES

1. Introduction

The purpose of this section is to assess a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives and avoid or substantially lessen any of the potential significant effects of the Project and to evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6). The CEQA Guidelines state that the selection of alternatives should be governed by a "rule of reason." The CEQA Guidelines also state that, "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Generally, significant effects of an alternative shall be discussed, but in less detail than the project, and should provide decision-makers perspective as well as a reasoned choice.

2. Analysis Format

To develop Project alternatives, the Lead Agency considered the Project objectives and reviewed the significant impacts identified in Section IV of this EIR and evaluated the comparative merits of the alternatives. The potential environmental impacts associated with the selected Alternatives are described below and are compared to the environmental impacts associated with the Project.

a) Project Objectives

The objectives of the Project are as follows:

- Provide improved facilities and accommodations in support of camp operations.
- Enhance safety by reducing potential pedestrian and vehicle conflicts.
- Relocate accommodations to areas outside of the FEMA flood hazard zone.
- Consolidate camp administration and operations.
- Preserve and enhance the aesthetic appearance of the camp.
- Educate campers on the use of energy and water efficient facilities.

b) Significant Project Impacts

As discussed in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would not result in any significant and unavoidable impacts.

3. Overview of Alternatives to the Project

The following alternatives to the Project have been selected for evaluation based on the objectives established for the Project and the feasibility of the alternatives considered.

Alternative 1: No Project Alternative

Alternative 2: Reduced Density Alternative

Alternative 3: Reduced Intensity Alternative

A more detailed discussion of the alternatives and impacts that would occur under the alternatives is included below. As stated above, implementation of the Project would not result in any significant and unavoidable impacts.

4. Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected due to the infeasibility of the alternative and/or the inability of the alternative to meet most of the basic Project's objectives or substantially reduce or avoid the Project's significant impact after mitigation. An EIR should also briefly explain the reasons for their rejection. According to CEQA Guidelines Section 15126.6(c), among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following alternatives were considered but were ultimately rejected for further review due to the infeasibility of these alternatives.

One alternative that was considered but rejected as infeasible is an "Alternate Project Site" Alternative. This alternative considered development of the Project on an alternative site elsewhere in Ventura County. However, the Project Site is currently developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses, and the Project proposes further development of the existing camp. This use has been in place since 1947. There are no other viable locations available that would include similar facilities and characteristics to the project site. Therefore, this alternative deemed infeasible and was rejected from further analysis.

5. Analysis of Selected Alternatives

a) Alternative 1: No Project Alternative

i) Description of the Alternative

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6[e][1]). Pursuant to CEQA

Guidelines Section 15126.6(e)(2), requirements of the analysis of the "no project" alternative are as follows:

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.*

At the time the Notice of Preparation (NOP) was published for the Project, there was no evidence that another development at the Project Site would be forthcoming in the event the Project is not approved. Thus, for purposes of this EIR, Alternative 1 assumes that the Project Site would remain in its current condition as described in Section III, Environmental Setting, as developed with American Jewish University's Brandeis-Bardin Campus, which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated assembly and event uses. Camp facilities are located within a 328-acre portion of the 2,558-acre Project Site. There are 117 existing structures associated with the camp, totaling approximately 208,000 square feet. Structural development on the campus includes an eclectic mix of rustic cabins and modern institutional structures. No discretionary actions would be required by local, state, or federal agencies for this alternative.

ii) Environmental Impacts

Aesthetics

Under Alternative 1, the existing camp and associated uses would remain on-site, and would continue in their existing state. As there would be no physical changes to the Project Site under Alternative 1, there would be no potential to impact scenic resources, and no impact would occur.

Agriculture Resources

The Project Site does not include any land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or forest land. While part of the undeveloped portion of the Project Site is classified as Farmland of Local Importance. As no development would occur under Alternative 1, no impacts with respect to agriculture resources would occur.

Air Quality

The Project Site is currently developed with an existing camp and associated uses, which would remain on-site as part of this Alternative. Therefore, no demolition, grading, or construction would be required under this Alternative and no new vehicle trips would be generated. In addition, no air pollutant emissions related to demolition, grading, or construction would be generated under this Alternative. As such, this Alternative would result in no impact with respect to air quality, which would be less than the Project's less than significant impacts.

Biological Resources

The Project Site is currently developed with an existing camp and associated uses, which would remain on-site as part of this Alternative. Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. Therefore Alternative 1 would not have the potential to impact special status species, wetlands, wildlife connectivity, or protected trees. As such, Alternative 1 would result in no impact with respect to biological resources.

Cultural Resources

As discussed in Section IV.F, Cultural Resources, of this Draft EIR, there are no historic resources within the Development Footprint. Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. Therefore Alternative 1 would not have the potential to encounter unknown buried archaeological resources or human remains. Alternative 1 would therefore have no impact to cultural resources,

Energy

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. No additional demand for energy beyond the existing demand from the existing camp and associated facilities currently at the Project Site would occur. Therefore, this Alternative would result in no impact with respect to energy (electricity and natural gas), which is less than the Project's less than significant impacts.

Geology and Soils

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. However, Alternative 1 would result in a slightly greater impact with respect to geology, as compared with the Project's less than significant impact. This is because this alternative would not have new construction, which (due to updated building codes) would be seismically superior to the existing buildings. Thus, the alternative would have older buildings that may be more vulnerable to geologic impacts than new structures, but this impact would still be less than significant.

Greenhouse Gas Emissions

The Project Site is currently developed with an existing camp and associated uses, which would remain on-site as part of this Alternative. Therefore, no demolition, grading, or construction would be required under this Alternative and no new vehicle trips would be generated. This Alternative would not be expected to result in increased GHG emissions, as it would not increase electricity and natural gas consumption, vehicle miles traveled (VMT), water use, and solid waste generation and subsequent disposal into landfills, and no impact with respect to GHG emissions would occur.

Hazards and Hazardous Materials

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. Therefore, Alternative 1 would not have the potential to temporarily use hazardous materials during construction, and this alternative would result in no impact with respect to hazardous materials.

Hydrology and Water Quality

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. There would be no change in impacts to water quality, drainage, flooding, and runoff as compared to existing conditions. Alternative 1 would have a less than significant impact to hydrology and water quality. It should be noted that the effectiveness of any existing water quality best management practices (BMPs) currently used at the Project Site may not meet current water quality standards, and the quality of water drainage from the Project Site may not improve, as would occur under the Project. Overall, the impacts of this Alternative would be comparable to the Project's less than significant impacts.

Noise

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. Thus, no new sources of noise or vibration would be created. Alternative 1 would therefore have no impact with respect to noise.

Public Services (Fire and Police)

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. The Project Site is currently developed with an existing camp and associated uses, which would remain on-site as part of this Alternative. No additional demand for public services beyond the existing demand from land uses currently at the Project Site would occur. Alternative 1 would therefore have no impact to public services.

Recreation

The Project Site is currently developed with an existing recreational camp facility, which would remain on-site under Alternative 1, and no additional demand for recreational facilities would occur. Therefore, Alternative 1 would result in no impact with respect to recreation.

Transportation

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. The Project Site is currently developed with an existing camp and associated uses, which would remain on-site as part of this Alternative. As such, Alternative 1 would not generate any new trips or VMT when compared to the existing uses. Therefore, Alternative 1 would result in no impact with respect to transportation.

Tribal Cultural Resources

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. Therefore Alternative 1 would not have the potential to encounter tribal cultural resources, and no impact would occur.

Utilities and Service Systems

Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. No additional demand for utilities beyond the existing demand from the existing camp and associated facilities currently at the Project Site would occur. Therefore, this Alternative would result in no impact with respect to utilities (water, wastewater, and solid waste), which is less than the Project's less than significant impacts.

Wildfire

As discussed in Section IV.R, Wildfire, of the Draft EIR, the Project Site is located within a State Responsibility Area. Under Alternative 1, no demolition or construction would occur, and the Project Site would not be developed with new land uses. However, none of the site improvements that are required as part of Mitigation Measure MM-FIRE-1 would be constructed either. Therefore, based on the fact that the fire safety improvements would not be implemented under Alternative 1, Alternative 1 would increase the risk associated with wildfire at the Project Site when compared to the Project. Therefore, wildfire impacts with a no-project alternative would be potentially significant but mitigable.

iii) Relationship of Alternative 1 to the Project Objectives

Alternative 1 would not meet any of the Project objectives, as it would not involve any physical improvements to the existing camp or allow for modifications to camp attendance and proposed events.

b) Alternative 2: Reduced Density Alternative

i) Description of the Alternative

Alternative 2 would consist of the Reduced Density Alternative. As with the Project, several structures would be demolished to accommodate the proposed improvements. These include three trailers used for staff housing (Building Nos. 55 through 57), two cottages used for staff housing (Building Nos. 9 and 10), and a detached garage (Building No. 11). Alternative 2 would then consist of the following physical improvements, representing an approximately 20 percent reduction when compared to the Project:

- Welcome Center: 3,568 square feet
- Camper Cabins: 20,072 square feet
- Head Counselor Cabins: 1,058 square feet
- Arts Pavilion: 1,846 square feet

However, like the Project, Alternative 2 would include an increase in camp population of 100 campers, as well as the following intensification of the event use:

- up to 150 events per year, each with up to 300 attendees;
- up to 10 events per year, each with up to 500 attendees; and
- up to six events per year, each with up to 1,000 attendees.

ii) Environmental Impacts

Aesthetics

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.B, Aesthetics, of this Draft EIR, determined that the Project would not be viewable from public vantage points and that the Project would not result in any impacts to scenic resources. As Alternative 2 would be smaller than the Project, it would also result in less than significant impacts with respect to scenic resources.

Agriculture Resources

The Project Site does not include any land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or forest land. While part of the undeveloped portion of the Project Site is classified as Farmland of Local Importance, as for the Project, the new development that would occur under Alternative 2 would not be located on Farmland of Local Importance. Therefore, no impacts with respect to agriculture resources would occur.

Air Quality

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.C, Air Quality, of this Draft EIR, determined that emissions associated with the Project would not exceed the applicable thresholds. As Alternative 2 would be approximately 20 percent smaller than the Project, it would result in proportionately reduced emissions when compared to the Project. Therefore, Alternative 2's impacts with respect to air quality would be less than significant.

Biological Resources

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. While the size of the improvements constructed under this Alternative would be reduced when compared to the Project, the improvements would be located within the same envelope of development as the Project. Therefore, Alternative 2's impacts with respect to biological resources would be similar to the Project, and like the Project, Alternative 2 would implement mitigation measures related to special status species, wetlands, wildlife connectivity, and protected trees. With implementation of these mitigation measures, Alternative 2's impacts with respect to biological resources would be less than significant.

Cultural Resources

As discussed in Section IV.F, Cultural Resources, of this Draft EIR, there are no historic resources within the Development Footprint, and no archaeological resources were observed on-site. Like the Project, Alternative 2 would consist of the development of additional facilities on the Project, although these facilities would be reduced in size by approximately 20 percent when compared to the Project. If any human remains are discovered during construction of Alternative 2, compliance with existing regulations would ensure that the impact would be less than significant. Therefore, Alternative 2's impacts with respect to cultural resources would be less than significant.

Energy

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.G, Energy, of this Draft EIR, determined that Project impacts with respect to energy would be less than significant. As Alternative 2 would be approximately 20 percent smaller than the Project, it would result in a proportionately reduced demand for energy when compared to the Project. Therefore, Alternative 2's impacts with respect to energy would also be less than

significant.

Geology and Soils

Under Alternative 2, demolition of some of the existing uses would occur, and the Project Site would be developed with new land uses. Geologic impacts are site-specific. Therefore, regardless of the type of development that would occur, the Project Site presents the same potential geologic and geotechnical conditions. Any development (including development under Alternative 2) would be subject to the same geotechnical considerations and would be required to occur in conformance with the County's building code standards. Therefore, like the Project, Alternative 2 would have a less than significant impact to geology and soils.

Greenhouse Gas Emissions

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.I, Greenhouse Gas Emissions, of this Draft EIR, determined that Project impacts with respect to GHG emissions would be less than significant. As Alternative 2 would be approximately 20 percent smaller than the Project, it would result in proportionately reduced emissions when compared to the Project. Therefore, Alternative 2's impacts with respect to GHG emissions would also be less than significant.

Hazards and Hazardous Materials

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. As with the Project, this alternative would temporarily use hazardous materials for construction of the new facilities, and the new facilities would use typical hazardous materials during operation (cleaning products, paint, petroleum products, etc.) similar the existing uses, although the amount would be proportionally reduced based on the reduction in size of this alternative. Additionally, this Alternative would also be required to implement Mitigation Measure MM-HAZ-1 (Fire Safety Plan) to minimize impacts related to potential wildfires. Therefore, Alternative 2's impacts with respect to hazards and hazardous materials would be less than significant with mitigation.

Hydrology and Water Quality

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. While the size of the improvements constructed under this Alternative would be reduced when compared to the Project, the improvements would be located within the same envelope of development as the

Project. Therefore, Alternative 2's impacts with respect to hydrology and water quality would be similar to the Project, and like the Project, Alternative 2 would reduce the amount of surface water runoff leaving the Project Site and would positively impact stormwater quality in the area. Therefore, Alternative 2's impacts with respect to hydrology and water quality would be less than significant.

Noise

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.L, Noise, of this Draft EIR, determined that Project impacts with respect to noise and vibration would be less than significant. As Alternative 2 would be approximately 20 percent smaller than the Project, it would result in proportionately reduced impacts when compared to the Project. Therefore, Alternative 2's impacts with respect to noise and vibration would also be less than significant.

Public Services (Fire and Police)

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. While the size of Alternative 2's physical facilities would be reduced when compared to the Project, Alternative 2 would include the same increase as the Project with respect to campers and event attendees. It is possible that as with the Project, the Ventura County Fire Department (VCFD) could require site improvements based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure MM-FIRE-1. Additionally, this Alternative would also be required to implement Mitigation Measure MM-HAZ-1 (Fire Safety Plan) to minimize impacts related to potential wildfires. Therefore, Alternative 2's demand for fire and police would be less than significant, and similar to the Project with mitigation.

Recreation

Like the Project, Alternative 2 consists of the development of additional facilities at the existing camp site, although the additional facilities would be reduced in size by approximately 20 percent when compared to the Project. Also like the Project, Alternative 2 would not create an increased demand for parks and recreational facilities associated with a residential population. Therefore, Alternative 2 would result in no impacts with respect to recreational facilities.

Transportation

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced

in size by approximately 20 percent when compared to the Project. While the size of Alternative 2's physical facilities would be reduced when compared to the Project, Alternative 2 would include the same increase as the Project with respect to campers and event attendees. Therefore, Alternative 2 would result in the same generation of trips as VMT as the Project, and like the Project, Alternative 2's impacts with respect to transportation would be less than significant.

Tribal Cultural Resources

Like the Project, Alternative 2 would consist of the development of additional facilities on the Project Site, although these facilities would be reduced in size by approximately 20 percent when compared to the Project. As with the Project, because this Alternative would include ground-disturbing activities, Alternative 2 would be required to implement Mitigation Measures MM-TCR-1 through MM-TCR-4 to ensure that no significant impacts related to discovery of unknown tribal cultural resources would occur. Therefore, Alternative 2's impacts with respect to tribal cultural resources would be less than significant with mitigation.

Utilities and Service Systems

Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. The analysis contained in Section IV.Q, Utilities and Service Systems, of this Draft EIR, determined that Project impacts with respect to utilities (water, wastewater, and solid waste) would be less than significant. As Alternative 2 would be approximately 20 percent smaller than the Project, it would result in a proportionately reduced demand for utilities when compared to the Project. Therefore, Alternative 2's impacts with respect to utilities would also be less than significant.

Wildfire

As discussed in Section IV.R, Wildfire, of the Draft EIR, the Project Site is located within a State Responsibility Area. Like the Project, Alternative 2 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 2, these improvements would be reduced in size by approximately 20 percent when compared to the Project. Similar to the Project, Alternative 2 may marginally increase the wildfire risk at the Project Site due to the addition of new facilities and increased camp and special event attendance. However, like the Project, Alternative 2 would be required to implement Mitigation Measure MM-HAZ-1, which requires the Applicant to coordinate with the Fire Department and develop and implement appropriate site management and maintenance plans. Additionally, like the Project, Alternative 2 would be required to implement Mitigation Measure MM-WF-1, which requires the preparation and implementation of a post-fire response plan to minimize post-fire landslide/slope instability risks. It is possible that as with the Project, VCFD could require site improvements under Alternative 2 based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure MM-FIRE-1. Compliance with applicable zoning, building, and fire codes and implementation of Mitigation Measure MM-HAZ-1, Mitigation Measure MM-FIRE-1, and MM-

WF-1 would ensure that the Alternative 2 would not exacerbate wildfire risks, and this impact would therefore be less than significant.

iii) Relationship of Alternative 2 to the Project Objectives

Alternative 2 would partially meet the Project objectives, as it includes the same increase in camp population and intensification of the event use as the Project, but includes a 20 percent reduction in the size of the physical improvements on the Project Site.

c) Alternative 3: Reduced Intensity Alternative

i) Description of the Alternative

Alternative 3 would consist of the Reduced Intensity Alternative. As for the Project, several structures would be demolished to accommodate the proposed improvements. These include three trailers used for staff housing (Building Nos. 55 through 57), two cottages used for staff housing (Building Nos. 9 and 10), and a detached garage (Building No. 11). Like the Project, Alternative 3 would consist of the following physical improvements:

- Welcome Center: 4,460 square feet
- Camper Cabins: 25,090 square feet
- Head Counselor Cabins: 1,323 square feet
- Arts Pavilion: 2,308 square feet

However, while Alternative 3 would also include an increase in camp population and event intensity, these increases would be reduced by approximately 20 percent when compared to the Project. Therefore, Alternative 3 would include an increase in camp population of 80 campers, as well as the following intensification of the event use:

- up to 120 events per year, each with up to 300 attendees;
- up to eight events per year, each with up to 500 attendees; and
- up to five events per year, each with up to 1,000 attendees.

ii) Environmental Impacts

Aesthetics

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. The analysis contained in Section IV.B, Aesthetics, of this Draft EIR, determined that the Project would not be viewable from public vantage points and that the Project would not result in any impacts to scenic resources. As Alternative 3 would construct the same physical buildings as the Project, it would result in the same less than significant impacts with respect to scenic resources.

Agriculture Resources

The Project Site does not include any land classified by the California Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or forest land. While part of the undeveloped portion of the Project Site is classified as Farmland of Local Importance, as for the Project, the new development that would occur under Alternative 3 would not be located on Farmland of Local Importance. Therefore, no impacts with respect to agriculture resources would occur.

Air Quality

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. The analysis contained in Section IV.C, Air Quality, of this Draft EIR, determined that emissions associated with the Project would not exceed the applicable thresholds. As Alternative 3 would consist of the construction of the same structures as the Project, Alternative 3 would result in similar air emissions as the Project. Therefore, Alternative 3's impacts with respect to air quality would be less than significant.

Biological Resources

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. Alternative 3 would construct the same physical buildings in the same location as the Project. Therefore, Alternative 3's impacts with respect to biological resources would be similar to the Project, and like the Project, Alternative 3 would implement mitigation measures related to special status species, wetlands, wildlife connectivity, and protected trees. With implementation of these mitigation measures, Alternative 3's impacts with respect to biological resources would be less than significant.

Cultural Resources

As discussed in Section IV.F, Cultural Resources, of this Draft EIR, there are no historic resources on the Project Site, and no archaeological resources were observed on-site. Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. Like the Project, if any human remains are discovered during construction of Alternative 3, compliance with existing regulations would ensure that the impact would be less than significant. Therefore, Alternative 3's impacts with respect to cultural resources would be less than significant.

Energy

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. The analysis contained in Section IV.G, Energy, of this Draft EIR, determined that Project impacts with respect to energy would be less than significant. As Alternative 3 would construct the same physical buildings as the Project, Alternative 3 would result in a similar demand for energy as the Project. Therefore, Alternative 3's impacts with respect to energy would also be less than significant.

Geology and Soils

Under Alternative 3, demolition of some of the existing uses would occur, and the Project Site would be developed with new land uses. Geologic impacts are site-specific. Therefore, regardless of the type of development that would occur, the Project Site presents the same potential geologic and geotechnical conditions. Any development (including development under Alternative 3) would be subject to the same geotechnical considerations and would be required to occur in conformance with the County's building code standards. Therefore, similar to the Project, Alternative 3 would have a less than significant impact to geology and soils.

Greenhouse Gas Emissions

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. The analysis contained in Section IV.I, Greenhouse Gas Emissions, of this Draft EIR, determined that Project impacts with respect to GHG emissions would be less than significant. As Alternative 3 would consist of the construction of the same structures as the Project, Alternative 3 would result in similar GHG emissions as the Project. Therefore, Alternative 3's impacts with respect to GHG emissions would be less than significant.

Hazards and Hazardous Materials

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. Similar to the Project, this alternative would temporarily use hazardous materials for construction of the new facilities, and the new facilities would use typical hazardous materials during operation (cleaning products, paint, petroleum products, etc.) similar the existing uses. Additionally, this Alternative would also be required to implement Mitigation Measure MM-HAZ-1 (Fire Safety Plan) to minimize impacts related to potential wildfires. Therefore, Alternative 3's impacts with respect to hazards and hazardous materials would be less than significant with mitigation.

Hydrology and Water Quality

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. Alternative 3 would construct the same physical buildings in the same location as the Project. Therefore, Alternative 3's impacts with respect to hydrological and water quality would be similar to the Project, and like the Project, Alternative 3 would reduce the amount of surface water runoff leaving the Project Site and would positively impact stormwater quality in the area. Therefore, Alternative 3's impacts with respect to hydrology and water quality would be less than significant.

Noise

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. The analysis contained in Section IV.L, Noise, of this Draft EIR, determined that Project impacts with respect to noise and vibration would be less than significant. As Alternative 3 would consist of the construction of the same structures as the Project, Alternative 3 would result in similar noise impacts as the Project. Therefore, Alternative 3's impacts with respect to noise would be less than significant.

Public Services (Fire and Police)

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. While the size of Alternative 3's physical facilities would be the same as the Project, the reduction in camp attendees and events would marginally reduce the demand for fire and police services when compared to the Project. However, it is possible that as with the Project, VCFD could require site improvements based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure MM-FIRE-1. Additionally, this Alternative would also be required to implement Mitigation Measure MM-HAZ-1 (Fire Safety Plan) to minimize impacts related to potential wildfires. Therefore, Alternative 3's demand for fire and police would be less than significant with mitigation.

Recreation

Like the Project, Alternative 3 consists of the development of additional facilities at the existing camp site and would also not create an increased demand for parks and recreational facilities associated with a residential population. Therefore, Alternative 3 would result in no impacts with respect to recreational facilities.

Transportation

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. However, while the size of Alternative 3's physical facilities would be the same as the Project, the reduction in camp attendees and events would marginally reduce trip generation and VMT when compared to the Project. Therefore, Alternative 3's impacts with respect to transportation would be less than significant.

Tribal Cultural Resources

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. As with the Project, because this Alternative would include ground-disturbing activities, Alternative 3 would be required to implement Mitigation Measures MM-TCR-1 through MM-TCR-4 to ensure that no significant impacts related to discovery of unknown tribal cultural resources would occur. Therefore, Alternative 3's impacts with respect to tribal cultural resources would be less than significant with mitigation.

Utilities and Service Systems

Alternative 3 consists of the development of the same additional facilities as the Project, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. However, under Alternative 3, the proposed increases in camp attendance and proposed events would be reduced by approximately 20 percent when compared to the Project. Alternative 3 would construct the same physical buildings in the same location as the Project. Therefore, Alternative 3's impacts with respect to utilities would be similar to the Project, and also less than significant.

Wildfire

As discussed in Section IV.R, Wildfire, of the Draft EIR, the Project Site is located within a State Responsibility Area. Like the Project, Alternative 3 consists of the development of additional facilities, including a Welcome Center, camper cabins, head counselor cabins, an arts pavilion, a new parking lot, and landscaping improvements. Therefore, similar to the Project, Alternative 3 may marginally increase the wildfire risk at the Project Site due to the addition of new facilities and increased camp and special event attendance. However, like the Project, Alternative 3 would be required to implement Mitigation Measure MM-HAZ-1, which requires the Applicant to coordinate with the Fire Department and develop and implement appropriate site management and maintenance plans. Additionally, like the Project, Alternative 2 would be required to implement Mitigation Measure MM-WF-1, which requires the preparation and implementation of a post-fire response plan to minimize post-fire landslide/slope instability risks. It is possible that as with the Project, VCFD could require site improvements under Alternative 3 based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure

MM-FIRE-1. Compliance with applicable zoning, building, and fire codes and implementation of Mitigation Measure MM-HAZ-1, Mitigation Measure MM-FIRE-1, and MM-WF-1would ensure that the Alternative 3 would not exacerbate wildfire risks, and this impact would therefore be less than significant.

iii) Relationship of Alternative 3 to the Project Objectives

Alternative 3 would partially meet the Project objectives, as it includes the same physical improvements as the Project, but includes a 20 percent reduction in the camper increase and intensification of event use when compared to the Project.

d) Environmentally Superior Alternative

A comparison of the impacts that would occur under the Project verses the impacts that would occur under each alternative is included in Table V-1.

Alternative 1 (the No Project Alternative) would be the environmentally superior alternative. However, as described previously, Alternative 1 would not achieve any of the Project objectives. In accordance with *CEQA Guidelines* Section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Alternative 2 would therefore be considered the Environmentally Superior Alternative, as it would result in reduced impacts with respect to aesthetics, air quality, energy, GHG emissions, hazardous materials, noise, and utilities, based on the 20 percent reduction in size of physical improvements when compared to the Project. However, as described previously, Alternative 2 would only partially meet the Project objectives, as it includes the same increase in camp population and intensification of the event use as the Project, but includes a 20 percent reduction in the size of the physical improvements on the Project Site.

Table V-1
Comparison of Environmental Impacts

Environmental Impact Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Reduced Intensity
Aesthetics/Scenic Resources	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Agriculture Resources	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Air Quality	LTS	NI	LTS (reduced emissions)	LTS (reduced emissions)
Biological Resources	LTS	NI	LTS (similar to Project	LTS (similar to Project)
Cultural Resources	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Energy	LTS	NI	LTS (reduced consumption)	LTS (reduced consumption)
Geology and Soils	LTS	LTS	LTS (similar to Project)	LTS (similar to Project)
Greenhouse Gas Emissions	LTS	NI	LTS (reduced emissions)	LTS (reduced emissions)
Hazards and Hazardous Materials	LTS w/M	NI	LTS w/M (similar to Project)	LTS w/M (similar to Project)
Hydrology and Water Quality	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Noise	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Public Services	LTS w/M	NI	LTS w/M (similar to Project)	LTS w/M (similar to Project)
Recreation	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Transportation	LTS	NI	LTS (similar to Project)	LTS (similar to Project)
Tribal Cultural Resources	LTS w/M	NI	LTS w/M (similar to Project)	LTS w/M (similar to Project)
Utilities and Service Systems	LTS	NI	LTS (reduced need)	LTS (reduced need)
Wildfire	LTS w/M	LTS w/ M	LTS w/M (similar to Project)	LTS w/M (similar to Project)

LTS = less than significant impact
NI = no impact
LTS w/M = less than significant impact with mitigation

VI. OTHER CEQA CONSIDERATIONS

1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would not result in any significant and unavoidable impacts.

2. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

a) Solid Waste

As discussed in Section IV.Q.C, Utilities and Service Systems – Solid Waste, of this Draft EIR, during the construction phase, the Project would be required to comply with the State's construction and demolition (C&D) Waste Materials Diversion Requirements, which would divert much of the construction debris from landfill disposal to a recycling facility. During operations, the Project would result in an increase of approximately 0.05 tons of solid waste per day. As required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. In addition, the Project will participate in City programs that adhere to State and local solid waste policies and objectives that further goals to divert waste from landfill disposal.

b) Water

The Project's consumption of water is addressed in Section IV.Q.B, Utilities and Service Systems – Water, of this Draft EIR. Given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the analysis contained in Section IV.Q.B of this Draft EIR concluded that the Project's water supply could be accommodated via existing supplies and infrastructure. Thus, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c) Energy

The Project's consumption of energy (electricity, natural gas, and fossil fuels) is addressed in Section IV.G, Energy, of this Draft EIR. The analysis provided in that section concluded that the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and Project construction and operation activities would result in less-than-significant impacts on energy resources.

d) Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial given the small scale of the Project. In addition, none of the materials required to construct the Project would be rare or in highly limited supply. Further, such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

3. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a) Population and Employment

As discussed in Section IV.A, Impacts Found to be Less Than Significant, of this Draft EIR, the Project includes the expansion of an existing recreational camp facility. The Project does not include development of any residential uses, would not increase the number of residents in the Project Site area. In addition, the proposed physical improvements would not increase the employment at the Project Site such that it would induce substantial population growth and/or require permanent housing. Therefore, the Project would not result in a significant direct growth-inducing impact.

b) Utility Infrastructure Improvements

The Project Site is currently developed with an existing recreational camp facility, and the Project includes the expansion of the existing use. The Project Site is already served by an existing roadway network and utility and public services infrastructure. The Project does not include the development of any new or extended roadways or other infrastructure that would be growth-inducing. Though the project includes formal recognition of the Brandeis-Bardin Mutual Water Company water system, the system is existing, the proposed improvements are minimal, and the water company's only customer is the camp. Therefore, any infrastructure upgrades would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

VII. ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM	Asbestos-containing materials
AIC	Archaeological Information Center
AJU	American Jewish University
AIM	Advance Infrastructure Mitigation
ANSI	American National Standards Institute
APN	Assessor Parcel Number
APNs	Assessor Parcel Numbers
APTF	Advanced Propulsion Test Facility
AQMP	Air Quality Management Plan
ARPA	Archaeological Resources Protection Act
ATCM	Airborne Toxic Control Measures
AST	Aboveground Storage Tanks
BAPP	Bat Avoidance and Protection Plan
BAU	Business as Usual
BBI	Brandeis-Bardin Institute
BCI	Brandeis-Collegiate Institute
BMP	Best Management Practices
BWT	Business Plan, Waste Producers, and Underground Tanks
CAA	Clean Air Act (Federal)
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Cal-EMA	California Emergency Management Agency
CAL FIRE	Department of Forestry and Fire Protections
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
Cal OES	State Office of Emergency Services
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDFA	California Department of Food and Agriculture
CDFG	California Department of Fish and Game
CDOC	California Department of Conservation
CERFA	Community Environmental Response Facilities Act
CFC	California Fire Code
CFR	Code of Federal Regulations

CEC	California Energy Commission
CEE	Consortium for Energy Efficiency
CEUS	Commercial End-Use Survey
CEQA	California Environmental Quality Act
cf	Cubic Feet
CFC	Chlorofluorocarbons
CFC	California Fire Code
CFCP	California Farmland Conservancy Program
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERT	Community Emergency Response Teams
CFR	Code of Federal Regulations
CHB	Cultural Heritage Board
CHRIS	California Historical Resources Information System
CIWQS	California Integrated Water Quality System
CMWD	Calleguas Municipal Water District
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
Co	Ventura County
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CTC	California Transportation Commission
CTPA	California Timberland Productivity Act
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code
D.A.R.T.	Disaster Assistance Response Team
dB	Decibel
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DLRP	Division of Land Resource Protection
DOE	U.S. Department of Energy
DOSH	Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	Department of Toxic and Substance Control
DWR	California Department of Water Resources
ECHO	Enforcement and Compliance History Online
ECJ	East County Jail
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EMFAC	Emission Factor
EMMA	Emergency Manger Mutual Aid
EPA	Environmental Protection Act
FC	Federal Candidate

FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FHRP	Fire Hazard Reduction Program
FHWA	Federal Highway Administration
FHSZ	Fire Hazard Severity Zones
FIFRA	Fungicide, and Rodenticide Act
FINDS	Facility Index System
FIS	Flood insurance studies
FLP	Forest Legacy Program
FPPA	Farmland Protection and Policy Act
FMMP	Farmland Mapping and Monitoring Program
ESA	Endangered Species Act
FSC	Federal Species of Concern
ESHA	Environmentally Sensitive Habitat Area
FSZA	Farmland Security Zone Area
FT	Federally Threatened
FTA	Federal Transit Administration
GAMA	Groundwater Ambient Monitoring and Assessment
GHG	Greenhouse gas
GPA	General Plan Amendment
gpd	Gallons per day
GSA	Groundwater sustainability agencies
GSI	GSI Environmental Inc.
GSP	Groundwater sustainability plans
GWh	Gigawatt hours
HASP	Health and Safety Plan
HazMat	Hazardous Materials
HAZNET	Facilities and Manifest Date
HFA	Hazardous Fire Area
NFPA	National Fire Protection Association
HMGP	Hazard Mitigation Grant Program
HMTA	Hazardous Materials Transportation Act
HVAC	Heating, Ventilation, and Air Conditioning
HWCL	Hazardous Waste Control Law
HWTS	Hazardous Waste Tracking System
Hz	Hertz
IBC	International Building Code
IFC	International Fire Code
IIPP	Injury and Illness Prevention Program
ISAG	Initial Study Assessment Guidelines
ITE	Institute of Transportation Engineers
kBTU	1,000 British Thermal Units
kWh	Kilowatt-Hour
LAFCo	Local Agency Formation Commission
LARWQCB	Los Angeles Regional Water Quality Control Board

lb	Pound
LBP	Lead-based paint
LCA	Land Conservation Act
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
L_{dn}	Average A-weighted Noise Level During a 24-Hour Day
L_{eq}	Equivalent Sound Level
L_{max}	Maximum, Instantaneous Noise Level
L_{min}	Minimum, Instantaneous Noise Level
LRA	Local Responsibility Area
LS	Less than Significant
LST	Localized Significance Thresholds
LTS	Less than Significant
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Levels
mgd	Millions of gallons per day
MLD	Most Likely Descendant
$MTCO_2e$	Metric Tons of Carbon Dioxide-Equivalent
MW	Megawatts
NAA	North American Aircraft
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NAT	No Action Taken
NAHC	Native American Heritage Commission
NCZO	Non-Coastal Zoning Ordinance
NEHRP	National Earthquake Hazards Reduction Program
NFIP	National Flood Insurance Program
NO_2	Nitrogen Dioxide
NonGen/NLR	Non Generators/No Longer Regulated
NOP	Notice of Preparation
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
O_3	Ozone
OES	Sherriff's Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OS	Open Space
OSHA	Occupational Safety and Health Administration
OVA	Organic vapor analyzer
PCB	Polychlorinated Biphenyls
PCE	Passenger Car Equivalency
PHMSA	Pipeline and Hazardous Materials Safety Administration

PM_{10}	Respirable Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
ppm	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRPA	Paleontological Recourses Prevention Act
PS	Potentially Significant
PS-M	Potentially Significant Project-Specific and Cumulative Impact – Mitigation Incorporated
PRC	Public Resources Code
RA	Rural Agricultural
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
RMS	Root Mean Square
RP	Responsible Parties
RPR	Rate Plant Rank
RPS	Renewables Portfolio Standard
RSPA	Research and Special Programs Administration
RWH	Rainwater Harvesting
RWQCB	Regional Water Quality Control Board
S/U	Significant Unavoidable Impact
SA1	Survey Area 1
SA2	Survey Area 2
SAA	Streambed Alteration Agreement
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCC	Sherriff's Communications Center
SCCIC	South Central Coastal Information Center
SCS	Soil Conservation Service
SDWA	Safe Drinking Water Act
SE	California Endangered
SEMS	Standard Emergency Management System
sf	Square Feet
SFP	California Fully Protected Species
SFHA	Special flood hazard areas
SGMA	Sustainable Groundwater Management Act
SLF	Sacred lands file search
SLTRP	Strategic Long-Term Resource Plan
SO_x	Sulfur Oxides
SOAR	Save Open Space & Agriculture Resources
SOV	Single Occupancy Vehicle
SR	California Rare
SR	State Route
SRA	Source Receptor Area

SRA	State responsibility area
SSC	California Species of Special Concern
SSFL	Santa Susana Field Laboratory
SSURGO	Soil Survey Geographic
ST	California Threatened
SUSMP	Standard Urban Stormwater Mitigation Project
SVP	Society for Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCE	Trichloroethylene
TCR	Tribal Cultural Resources
TGM	Technical Guidance Manuel
THP	Timber Harvest Plan
TPZ	Timberland Production Zone
TSCA	Toxic Substance Control Act
UFC	Uniform Fire Code
USACE	U.S. Army Corps of Engineers
USAR	Urban Search and Rescue
USDA	United States Department of Agricultural
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground storage tank
VCFD	Ventura County Fire Department
VdB	Vibration Magnitude
VIP	Volunteers in Policing
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
Yr	Year

VIII. PREPARERS OF THE EIR

Lead Agency	**County of Ventura** Resource Management Agency 800 South Victoria Avenue, Ventura, CA 93009 Susan Curtis Michael Conger
Environmental Consultant	**CAJA Environmental Services, LLC** 9410 Topanga Canyon Blvd., Suite 101, Chatsworth, CA 91311 Chris Joseph Stacie Henderson Kerrie Nicholson Seth Wulkan Andrea Schultz Sherrie Cruz
Project Applicant	**American Jewish University** 1101 Peppertree Lane, Brandeis, CA 93064
Air Quality	**DKA Planning** 423 Bohol Circle Lane, Alameda, CA 94501
Arborist	**Stantec Consulting Services, Inc.** 290 Conejo Ridge Avenue, Thousand Oaks, CA 91361
Archaeology	**W & S Consultants** 2242 Stinson Street, Simi Valley, CA 93065
Biology	**Wildscape Restoration** 1547 Los Angeles Avenue, Suite 110, Ventura, CA 93004
Biology	**Endemic Environmental Services, Inc.** 110 E. Wilshire Avenue #305, Fullerton, CA 92832
Geology	**GeoSoils Consultants Inc.** 6634 Valjean Avenue, Van Nuys, CA 91406
Greenhouse Gases	**DKA Planning** 423 Bohol Circle Lane, Alameda, CA 94501
Hazards	**Langan** 18575 Jamboree Road, Suite 150, Irvine, CA 92612

Historic	**San Buenaventura Research Associates** 1328 Woodland Drive, Santa Paula, CA 93040
Hydrology	**Stantec Consulting Services, Inc.** 300 N. Lake Avenue, Suite 400, Pasadena, CA 91101
Noise	**DKA Planning** 423 Bohol Circle Lane, Alameda, CA 94501
Paleontology	**SWCA Environmental Consultants** 320 N. Halstead Street, Suite 120, Pasadena, CA 91107
Traffic	**Linscott, Law & Greenspan, Engineers** 600 S. Lake Avenue, Suite 500, Pasadena, CA 91106
Traffic	**Stantec Consulting Services, Inc.** 300 N. Lake Avenue, Suite 400, Pasadena, CA 91101
Utilities	**Water Resource Engineering Associates** 2300 Alessandro Drive, Site 215, Ventura, CA 93001
Utilities	**KPFF Consulting Engineers** 700 S. Flower Street, Suite 2100, Los Angeles, CA 90017