

Appendix A

Notice of Preparation (NOP) and NOP Comments Received



Community Development Department
Planning & Zoning Division
250 North Ventura Road
Port Hueneme, California 93041
T: (805) 986-6500

www.ci.port-hueneme.ca.us

Notice of Preparation

DATE: APRIL 7, 2021
TO: RESPONSIBLE AND TRUSTEE AGENCIES AND INTERESTED PARTIES
SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF PORT HUENEME GENERAL PLAN AND HOUSING ELEMENT UPDATE

NOTICE IS HEREBY GIVEN that the City of Port Hueneme will be the Lead Agency and will prepare an Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) for the project described below. This Notice of Preparation has been issued to provide an opportunity for responsible and trustee agencies and interested parties to submit comments on the scope of the EIR, relative to the attached Project Summary. Agencies should comment on such information as it relates to their statutory responsibilities in connection with the proposed project. The City made the determination to prepare an EIR following preliminary review of the project. Pursuant to CEQA Guidelines Section 15063(a), because an EIR is needed, an initial study has not been prepared. Probable environmental effects of the project are described in the attached Project Summary.

Project Name: City of Port Hueneme General Plan and Housing Element Update

Project Location: City of Port Hueneme (citywide) in the County of Ventura (see Figure 1 attached).

Public Comment Period: The City of Port Hueneme welcomes and will consider all written comments regarding potential environmental impacts of the project and issues to be addressed in the Draft EIR. The public review period begins on April 7, 2021 and ends on May 7, 2021 at 5:00 p.m. Please direct your comments to:

Mail: Tony Stewart, Community Development Director/City Planner
Community Development Department
250 North Ventura Road
Port Hueneme, California 93041

Email: tstewart@cityofporthueneme.org

Please include your name, phone number and email or postal address.

Scoping Meeting: The City of Port Hueneme will host a scoping meeting to solicit input on the content of the environmental analysis that will be included in the Draft EIR.

Date and Time: April 22, 2021 at 6:00 p.m. via Zoom

Participants using a phone line:

Phone Numbers: (669) 900-9128 or (253) 215-8782 or (346) 248-7799 or (301) 715-8592 or (312) 626-6799 or (646) 558-8656

- Meeting ID: 916 9241 6478 (Password: 081096)
- To request to speak, press #9

Participants using a computer, tablet or smartphone:

- Access the webinar at this link:
<https://zoom.us/j/9169241647> (Password 081096)
- To request to speak, select "Raise Hand"

The City of Port Hueneme, in compliance with the Americans with Disabilities Act, requests individuals who require special accommodations to access, attend and/or participate in the City meeting due to disability, to please contact the City Clerk's Office, (805) 986-6503, at least one business day prior to the scheduled meeting to ensure that we may assist you.

Date: April 7, 2021

Signature:



Tony Stewart, AICP

Title:

Community Development Director/City Planner, City of Port Hueneme

Phone:

(805) 986-6500

Project Summary

Project Location and Setting

The project applies to the entire City of Port Hueneme (citywide). Port Hueneme is located along the coast in western Ventura County and is approximately 4.5 square miles in size (see Figure 1). Land uses are regulated under the City of Port Hueneme's General Plan, which has not been comprehensively updated since the 1990s. Existing land uses in the City consist of residential at varying densities, commercial, mixed use, industrial, port-related and parks. Adjacent cities include Oxnard and Ventura to the north, and Camarillo to the east. Unincorporated Ventura County is located to the south, west and north of Port Hueneme. Major roadway access to the city is provided by U.S. Highway 101.

Project Description

The project consists of a comprehensive update to the General Plan, including the Housing Element.

General Plan & Local Coastal Plan Update

The General Plan Update involves a comprehensive update of all elements of the existing Port Hueneme General Plan while the LCP Update involves a targeted update of that document aimed primarily at incorporating new requirements pertaining to sea level rise. All General Plan elements will be updated to reflect current conditions, requirements of Government Code Section 65302, and community preferences. Similar to the existing General Plan, the policy document will be organized into elements containing an introduction; issues identification; goals, policies, and implementation actions; and a plan narrative describing the basis for and application of the policies. The General Plan will contain the following elements: Air Quality; Circulation; Conservation, Open Space, and Environmental; Economic Development; Social Equity; Housing; Land Use; Noise; Public Safety and Facilities; Climate Action Plan (CAP) Element; and Local Coastal Program. Proposed land use changes are shown on Figure 2.

Social Equity and the CAP will be new General Plan elements. The Social Equity Element will meet the requirements of Senate Bill (SB) 1000 related to environmental justice and will identify disadvantaged communities in the City to facilitate transparency and public engagement in planning and decision making, reduce pollution and health risks in these communities, and promote equitable access to environmental benefits, such as health food options, housing, recreation, and public facilities. The CAP element's goal is to determine the current emissions baseline and comply with applicable state programs, such as SB 32 and SB 379. The CAP will include a community-wide greenhouse gas (GHG) inventory; emissions forecasts for the years 2020, 2030, and 2045; GHG reduction targets; and GHG mitigation strategies to reduce GHG emissions and streamline environmental reviews of individual City development projects in accordance with CEQA.

In conjunction with the General Plan Update, the City will also be updating its Local Coastal Plan for consistency with the General Plan and to meet the Coastal Commission's new guidelines on sea level rise. The LCP will conform to applicable provisions of the California Coastal Act relative to LCPs as outlined in the California Coastal Act.

Housing Element Update

The Housing Element is a state-mandated part of the City's General Plan and includes goals, policies, programs and objectives to further the development, improvement and preservation of housing in Port Hueneme in a manner that is aligned with community desires, regional growth projections, and state law. The Housing Element must address how the City will meet its housing needs, including the provision of adequate housing for residents of all income levels. State law requires update of the Housing Element every eight years. Port Hueneme's Housing Element was last updated in 2013 to cover the 2013-2021 period and the current update will cover the 2021-2029 period.



Element must address how the City will meet its housing needs, including the provision of adequate housing for residents of all income levels. State law requires update of the Housing Element every eight years. Port Hueneme’s Housing Element was last updated in 2013 to cover the 2013-2021 period and the current update will cover the 2021-2029 period.

One requirement of Housing Element is to provide adequate housing sites to provide for the City’s share of the Regional Housing Needs Allocation (RHNA), which quantifies the need for housing in every region throughout the state and is determined by the California Department of Housing and Community Development. The RHNA is mandated by state law and is meant to inform the local planning process by addressing existing and future housing needs. The Southern California Association of Governments (SCAG) is responsible for allocating the RHNA to each city and county in its region, which includes Port Hueneme.

SCAG’s overall regional allocation for the 2021-2029 period is 1.34 million new housing units. Based on this allocation, SCAG developed allocations for all the cities and counties in its region, including Port Hueneme. The City’s total draft RHNA for the 2021-2029 planning period is 125 units, allocated to specific income groups as shown in Table 1.

Table 1 City of Port Hueneme Regional Housing Needs Allocation (Proposed Final)

	Income Category				Total RHNA
	Very Low	Low	Moderate	Above Moderate	
Housing units needed	26	16	18	65	125

The City has identified six areas to accommodate the City’s RHNA allocation, which consist of sites with existing entitlements, vacant sites, and sites that are underutilized or have the potential for redevelopment. These housing sites inventory is included in Table 2 below.

Table 2 City of Port Hueneme Housing Sites Inventory

Site	Location	Existing Conditions and Uses	Unit Potential
1	S. Victoria Avenue	Vacant site with existing entitlements	114 Moderate Income
2	Corner of C and San Pedro Street	Vacant site with entitled Habitat for Humanity project	5 Lower Income
3	Pleasant Valley Way between Pomona Street and San Pedro Street	Older commercial and light industrial structures and uses	14 Lower Income
4	Port Hueneme Road and Surfside Drive	Hotel and commercial strip mall	19 Above Moderate Income
5	N. Ventura Road and Park Avenue	Vacant commercial structure and large parking lot	37 Lower Income
6	N. Ventura Road and E. Channel Islands Boulevard	Older commercial center	116 Moderate and Above Moderate Income

Sites identified for the housing element are shown on Figure 2. The 2021 Housing Element Update will also address any changes that have occurred since adoption of the current Housing Element. These changes include updated demographic information, housing needs data, and analysis of any potential housing constraints.

Probable Environmental Effects

The EIR for the proposed project will focus on the resource areas/issues germane to this particular project. The EIR will evaluate the potentially significant environmental impacts of the proposed project and will evaluate whether there are feasible mitigation measures that may lessen or avoid such impacts. The EIR will also identify and evaluate alternatives to the proposed project. Because the proposed project does not include any specific construction or development, but rather the potential for land use changes or development to be



constructed in the future, the City has determined that a Program EIR is the appropriate document under CEQA. Section 15168 of the CEQA Guidelines states that a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The proposed project may result in potentially significant environmental effects related to the following: Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Land Use and Planning, Population and Housing, Public Services and Recreation, Transportation, and Utilities and Service Systems. All of these environmental factors will be analyzed in depth in the Draft EIR. Other issue areas, including Agriculture and Forestry Resources, Mineral Resources, and Wildfire, are anticipated to have no impacts or less than significant impacts.



Figure 1 City of Port Hueneme Vicinity Map



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 Port Hueneme City Boundary

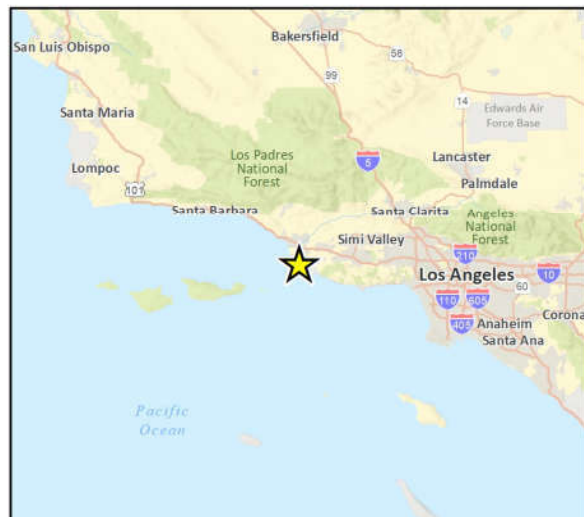
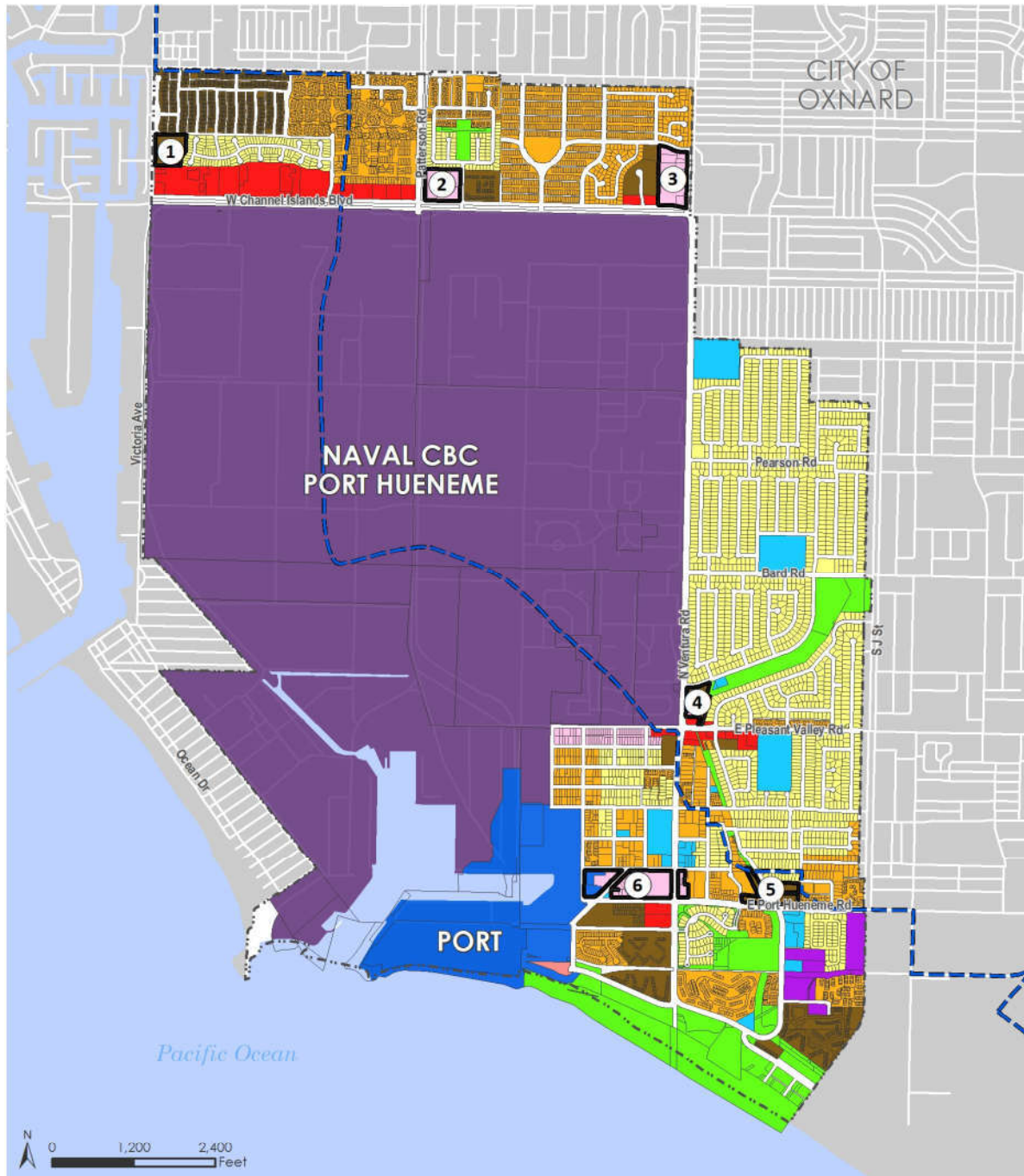


Fig 1 Regional Location



Figure 2 City of Port Hueneme Proposed Land Use Map with Land Use Changes Highlighted



 Port Hueneme City Boundary
 Coastal Zone Boundary

Land Use

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Low Density Residential | Industrial |
| Medium Density Residential | Public Facilities |
| High Density Residential | Parks and Open Space |
| Mixed Use | Port |
| Commercial | Military - Naval Base |
| Visitor Commercial | |


- 1 - Undeveloped Lot - South Victoria Avenue
- 2 - Casa Via Mar Inn and Tennis Club
- 3 - Hueneme Bay Shopping Center
- 4 - Port City Plaza
- 5 - Underutilized Commercial Lots
- 6 - Beach Port Center

Sources: City of Port Hueneme, Ventura County



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

M E M O R A N D U M

DATE: April 07, 2021
TO: RMA Planning Division
Attention: Anthony Ciuffetelli
FROM: Glenn Derossett, Engineering Manager III 
SUBJECT: REVIEW OF DOCUMENT
PROJECT NO.:

Lead Agency: **CITY OF PORT OF HUENEME**
APN#

Pursuant to your request, the Public Works Agency -- Transportation Department has reviewed the subject application and has determined that the application is for our areas of responsibility.

The Port Hueneme General Plan was last comprehensively updated in 1998. The City of Port Hueneme's 2045 General Plan Update will guide the City's economic and physical development through 2045. The General Plan is a long-term blueprint proposing policy goals to guide Port Hueneme's development. The General Plan update will include an update of the Port Hueneme Local Coastal Plan (LCP) and Climate Action Plan (CAP). This update will ensure that the City remains livable, economically resilient, and sustainable in the long-term.

We offer the following comments:

1. The County of Ventura, Public Works Agency, Roads & Transportation (VCPWA-RT) does not have any direct comments for the Notice of Preparation of the Draft EIR. However, VCPWA-RT would like the ability to review the Draft EIR when it becomes available.

Our review is limited to the impacts this project may have on the County's Regional Road Network. Please contact me at 654-2087 if you have questions.

CULTURAL HERITAGE BOARD
county of ventura

April 23, 2021

Anthony Ciuffetelli, RMA/Planning/EDR Coordinator
Sent via email: anthony.ciuffetelli@ventura.org

**Subject: Environmental Document Review – Non-County Project, RMA
Ref#21-006, City of Port Hueneme General Plan and Housing Element
Update Project**

Ventura County Cultural Heritage Board (CHB) Staff is in receipt of the invitation to comment on the above-referenced project and provides the following comments:

- Much of the Port Hueneme planning area has not yet been surveyed so historic resources may exist that have not yet been documented. Greater population density and more transportation infrastructure could lead to direct and indirect impacts on historical, paleontological and cultural resources from greater public access to them. Historic sites can exist in commercial, industrial, and institutional areas that have been previously disturbed by past activities.
- The City of Port Hueneme should set forth goals, policies and programs within the historical and cultural resources portion of the General Plan for evaluating the historical significance of those sites that contain buildings, structures, and objects that are fifty years of age or older. Fifty years of age is a general estimate of the time needed to develop historical perspective and to evaluate significance. This is a standard used by the Federal and State governments.

Thank you for the opportunity to comment on the proposed project. If you require anything further or have any questions, please contact Dillan Murray at (805) 654-5042 or at Dillan.Murray@ventura.org.

Sincerely,



Dillan Murray
Cultural Heritage Program Planner



DATE: May 5, 2021

TO: City of Port Hueneme

FROM: Dave Ward, AICP, Planning Director

SUBJECT: Notice of Preparation of a Draft Program Environmental Impact Report & General Plan. RMA 21-006

The Planning Division has reviewed the City of Port Hueneme Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) and General Plan and Housing Element Update (RMA 21-006), as it pertains to areas adjacent to the unincorporated Ventura County. Please receive the following comments associated with your project:

1. **Ventura County 2040 General Plan Policies**

In September 2020, the County Board of Supervisors adopted the 2040 General Plan which guides future growth, development and resource protection in the unincorporated County. The Plan includes several Guiding Principles which are central ideas that articulate the County's commitment to achieving the vision of the General Plan. Specifically, the Economic Vitality Element promotes fostering economic and job growth that is responsive to the evolving needs and opportunities of the County's economy and preserves land use compatibility with Naval Base Ventura County and the Port of Hueneme, while enhancing our quality of life and promoting environmental sustainability.

The General Plan, Land Use Element also includes Section 2.8 Military Compatibility which presents goals, policies and programs promoting collaboration between the Navy's military installations and the County. Specifically, there are seven policies which will ensure that County plans and policies are consistent with state laws concerning military compatibility and the recommendations contained in the Naval Base Ventura County Joint Land Use Study and Air Installations Compatible Use Zones. In addition, there are six programs which implement these policies.

Finally, the General Plan Circulation Element and Economic Vitality Element include policies which promote coordination with the Port of Hueneme and the Naval Base Ventura County related to circulation and economic development. These policies are listed below:

CTM-1.11 Safe and Efficient Goods Movement

The County shall coordinate with Caltrans and cities to ensure that truck routes are appropriately designed and designated for the safe and efficient movement of goods throughout the county, particularly to the Port of Hueneme. (IGC)

CTM-1.14 Railroad Grade Crossings

The County shall work with Union Pacific Railroad, the Port of Hueneme, owner of the Ventura County The County shall work with Union Pacific Railroad, the Port of Hueneme, owner of the Ventura County Railroad, Caltrans, cities, and the Ventura County Transportation Commission (VCTC) to continue to enhance roadway safety along railroad grade crossing surfaces through improvements including the installation of concrete railroad grade crossing surface panels. (IGC, SO)

EV-3.4 Expansion of Naval Base Ventura County and Port of Hueneme Support Businesses
The County shall encourage expansion and attraction of businesses that can further support existing activities at Naval Base Ventura County and the Port of Hueneme including the strengthening of existing business relationships and establishing spin-off businesses that can transfer technologies used for military applications into other markets. (IGC, JP)

EV-5.4 Port of Hueneme

The County shall support the creation and enhancement of shipping, warehousing facilities at the Port of Hueneme as well as improvements to surface transportation connections to the supportive industries and businesses that are located outside of the Port. (IGC, SO)

EV- E Implementation Program: Business Retention and Expansion

The County shall coordinate with the Economic Development Collaborative - Ventura County to focus on retention and expansion of existing businesses in key industry clusters, including Naval Base Ventura County and Port of Hueneme support businesses.

LU-21.7 Capital Improvement Coordination

The County shall coordinate with the Naval Base Ventura County (NBVC) and cities of Oxnard and Port Hueneme when updating its Capital Improvement Program for projects related to improvement projects on Victoria Avenue. (MPSP, IGC)

2. **Sea Level Rise**

Since 2017 the Ventura County Planning Division has undertaken planning efforts to improve resiliency to sea level rise and coastal hazards on approximately 30 miles of unincorporated County coastline. These efforts included development of a Vulnerability Assessment, an Adaptation Strategies Report, and draft policies for the Local Coastal Program. These documents are available at vcma.org/vc-resilient-coastal-adaptation-project. The Vulnerability Assessment and Adaptation Strategies Report concluded that multi-jurisdictional coordination is needed for sea level rise planning along the County's Central Coast. One adaptation focus area is the need for Tsunami evacuation route planning for the Silver Strand neighborhood that could include alternate routes through Port Hueneme.

In terms of the CEQA analysis that will be undertaken for the City’s General Plan Update, CEQA mandates that an analysis of a project’s impacts should consider whether the project might cause existing environmental hazards to get worse, including sea level rise. Therefore, the County Planning Division recommends that the EIR consider whether any General Plan policies that call for improvements to the Port of Hueneme (the Port) are supported by sufficient sea level rise analyses and adaptation strategies to protect the Port of Hueneme and mitigate projected impacts to surrounding unincorporated area neighborhoods as well as natural resources.

Relative to long-range planning for the City of Port Hueneme and the Port, the County would like to coordinate on regional and neighborhood-scale sea level rise adaptation strategies to reduce projected vulnerabilities, particularly as they may apply to the unincorporated area of Silver Strand. The [CoSMoS](#) sea level rise model predicts the following vulnerabilities for the Port of Hueneme and Silver Strand area:

- With 3.3 feet of sea level rise there will be impacts from rising tides.
- With 1.6 feet of sea level rise, combined with a 1 percent annual chance storm, there will be flooding impacts and the only Tsunami evacuation route out of Silver Strand (along Victoria Avenue) will be obstructed if nothing is done.
- Between 2.5 and 3.3 feet of sea level rise, combined with a 1 percent annual chance storm, flooding that extends up the canals and storm drainage systems at the Port will extend into areas with existing development in unincorporated Silver Strand.
- With about 5 feet of sea level rise, combined with a 1 percent annual chance storm, most of the Port and the Silver Strand community will be flooded.

This cursory sea level rise analysis indicates that, if State sea level guidance is applied, the Port is vulnerable to sea level rise within the City’s General Plan horizon. The Notice of Preparation describes that the City’s Climate Action Plan will include emissions forecasts through 2045. Given that current global emission rates are following the “high” Regional Concentration Pathway (RCP 8.5), and according to the probabilistic sea level rise projections in the *2018 State of California Sea Level Rise Guidance*, there is a greater than 1 percent chance that the rate of sea level rise will exceed 1 foot by 2040 (see image below), and it could reach the 1.6-foot threshold noted in the bullet points above by around 2050. The timing of sea level rise impacts used for planning purposes ultimately depends on the level of risk tolerance that the City (and the Port) decides is appropriate. Since the Port is critical infrastructure, using the “extreme” sea level rise projection, also referred to as “H+++”, may also

SANTA BARBARA - High emissions (RCP 8.5)

	Probability that sea-level rise will meet or exceed... (excludes H++)									
	1 FT.	2 FT.	3 FT.	4 FT.	5 FT.	6 FT.	7 FT.	8 FT.	9 FT.	10 FT.
2030										
2040	1.3%									
2050	14%	0.2%								
2060	40%	2%	0.2%							
2070	64%	7%	0.8%	0.2%	0.1%					
2080	78%	20%	3%	0.7%	0.2%	0.1%	0.1%			
2090	86%	37%	8%	2%	0.7%	0.3%	0.1%	0.1%	0.1%	
2100	89%	53%	19%	6%	2%	1%	0.3%	0.2%	0.1%	0.1%
2150	98%	87%	63%	38%	20%	11%	6%	3%	2%	1%

be appropriate. The H+++ scenario would plan for around 3 feet of sea level rise by 2050.

The importance of adequate sea level rise planning is underscored by the National defense capacity of the Port, as well as the costly and extended expected lifetime of heavy infrastructure improvements that may be needed. Planning early, for impacts that are projected to occur after the General Plan Horizon, would also be prudent.

3. Biological Resources

The County Planning Division would recommend that the Draft EIR contain provisions for the following biological resources:

- Pollinator Friendly Landscaping
In Ventura County and throughout California, there have been alarming population declines in many common pollinators including bee species, Western Monarch butterflies and other insects. Climate change (and resulting drought, fires, and increased temperatures), urbanization, pesticide use, introduced species, outdoor lighting and pollution are known to contribute to the decline in insect populations. Pollinator-friendly landscaping practices are those that support pollinators such as bees, butterflies, birds and bats with critical resources such as food, shelter, nesting areas and water throughout the year. Evidence shows that one of every three human bites of food relies on pollinators to some degree, including many of our favorite fruits, vegetables and nuts. Two of the top 10 crops by value in Ventura County -raspberries and avocados - require pollination to produce fruit, while others are enhanced by pollination (e.g., strawberries, blueberries, citrus, tomatoes). By incorporating simple policies for landscaping such as increasing the use of native species, ensuring there is enough diversity in plant types so that flowering resources are available throughout the year, and the inclusion of host plants and other larval landscape habitats for pollinators, the City can help support declining pollinator populations in the County.
- Control of Exotic Invasive Species. The spread of invasive species within the County is an issue of concern to the County. The County strongly supports the City's efforts to address the spread of invasive species through the new policy. Many invasive plants (e.g., Pampas grass) use wind to disperse across the landscape. When a Santa Ana wind occurs, these invasives can be spread miles away whether or not they are located adjacent to a natural area. By expanding the policy to prohibit the intentional planting of invasive and watch list species as documented by the California Invasive Plant Council at: <http://www.cal-ipc.org> the City can mitigate adverse impacts associated with their spread such as the increase of wildfire risk, erosion, water consumption, etc. In addition, encouraging projects to incorporate best management practices to reduce the spread of invasive plants during construction activities would also help limit the impact of infestations within the County.

Thank you for the opportunity to comment on the Draft PEIR and General Plan Update. If you have questions regarding the information set forth in this memo, please contact Dave Ward, at (805) 654-2481 or via email at Dave.Ward@ventura.org.



HOUSE FARM WORKERS!

Promoting safe, decent, and affordable housing
for Ventura County farm workers since 2004.

May 5, 2021

Mr. Tony Stewart, AICP, Community Development Director/City Planner
City of Port Hueneme

Sent via email to : tstewart@cityofporthueneme.org

Re: Comments on Draft 2021-2029 Housing Element Programs

This past year has highlighted the dire need for decent affordable housing for farm workers, essential workers contributing to a major sector of the Ventura County economy. When communities of color living in crowded conditions were hit hardest, the pandemic has reinforced the fact that a safe and secure national food supply requires a stable, healthy, trained workforce who live in quality affordable housing.

Since two Ventura County farmworker housing studies were published in 2002, *House Farm Workers! (HFW!)* has been advocating for more farm worker homes. But much has changed in the housing market, agricultural labor force, and County economy in the last 20 years. We need updated information in order to appropriately address farm worker housing needs.

As you and I discussed in March, the Board of Directors of *House Farm Workers!* strongly requests that you include the following two programs in the Housing Element (HE) to support the goal of increasing affordable housing for farm workers. We are submitting the same request to all cities in Ventura County. The City of Oxnard included both in their Draft HE submitted to the CA Department of Housing and Community Development (HCD).

Special Needs Housing - Farmworker Housing Study. The City will:

- a. work with the County of Ventura, advocacy groups, and agricultural organizations, to plan, fund, and implement a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs and barriers.

- b. utilize the survey results to develop targeted programs and strategies to address the verified needs of farmworkers and to support agricultural businesses with a stable and healthy workforce.
- c. Timeframe: by 2023.

Ventura County intends to take the lead role in implementing the Farmworker Housing Study which is included in their Draft 2021-29 Housing Element, submitted to the California Department of Housing and Community Development in March. In addition to Oxnard's commitment, the City of Camarillo Planning Commission has recommended participation in the study to the City Council (to be considered May 26). Initial grants totaling \$100,000 have been awarded to *HFW!* and the County for this work. An Advisory Council for the Study will be formed in the next few months and you will be invited to name a representative to participate in the Council.

Program: Contribute Funding for Affordable Housing. The City will:

- a. Support the Housing Trust Fund Ventura County, a local nonprofit organization that provides short term, pre-development, acquisition, and construction funding to developers of affordable housing by making an annual contribution.
- b. Support creation of a county-wide dedicated source of funding for affordable housing.

Supporting local funding sources for affordable housing, including dedicated farm worker units, will address one of the many challenges experienced by affordable housing developers and increase the production of homes for low and very low income households.

We welcome the opportunity to provide suggestions during the 2021-2029 Housing Element update process and look forward to actively participating at meetings and with written comments on draft and final documents.

Sincerely,

Leslie Leavens, Chair of *HFW!* Board of Directors

Linda Braunschweiger, Vice Chair of *HFW!* Board of Directors

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

May 6, 2021

Mr. Tony Stewart
Community Development Director/City Planner
Community Development Department
250 North Ventura Road
Port Hueneme, CA 93041

RE: City of Port Hueneme General Plan and
Housing Element Update
Vic. VEN-Citywide
SCH # 2021040164
GTS # VEN-2021-00447AL-NOP

Dear Mr. Stewart:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of a comprehensive update to the General Plan, including the Housing Element.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular

capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020.

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

Mr. Tony Stewart, Community Development Director/City Planner

May 6, 2021

Page 3 of 3

Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-00447AL-NOP.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse



May 6, 2021

Tony Stewart, Director
Community Development Department
250 North Ventura Rd
Port Hueneme, CA 93041

Subject: City of Port Hueneme General Plan and Housing Element Update

Dear Mr. Stewart,

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Anthony Ciuffetelli, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Anthony Ciuffetelli at (805) 654-2443.

Sincerely,


Tricia Maier, Manager
Planning Programs Section

Attachments

County RMA Reference Number 21-006



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
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May 7, 2021

Mr. Tony Stewart, Community Development Director/City Planner
City of Port Hueneme, Community Development Department
250 North Ventura Road
Port Hueneme, California 93041
Phone: (805) 986-6500
E-mail: tstewart@cityofporthueneme.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Port Hueneme General Plan and Housing Element Update [SCAG NO. IGR10378]

Dear Mr. Stewart,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Port Hueneme General Plan and Housing Element Update (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the City of Port Hueneme General Plan and Housing Element Update in Ventura County. The proposed project includes a comprehensive update to the General Plan that involves updates to the Housing Element for the 2021-2029 planning period and two new elements (i.e., Social Equity and Climate Action Plan), and targeted updates to the Local Coastal Plan.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Rongsheng Luo
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
CITY OF PORT HUENEME GENERAL PLAN AND HOUSING ELEMENT UPDATE
[SCAG NO. IGR10378]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016

and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Port Hueneme Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	22,089	22,336	22,367	22,361
Households	6,333,458	6,902,821	7,170,110	7,633,451	7,004	7,108	7,121	7,124
Employment	8,695,427	9,303,627	9,566,384	10,048,822	3,825	3,917	3,955	3,969

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

REGIONAL HOUSING NEEDS ALLOCATION

On March 4, 2021 SCAG’s Regional Council adopted the [6th cycle Final Regional Housing Needs Assessment \(RHNA\) Allocation Plan](#) which covers the planning period October 2021 through October 2029. The 6th cycle Final RHNA allocation for the applicable jurisdiction is below.

SCAG 6 th Cycle Final RHNA Allocation for City of Port Hueneme	
Very low income	26
Low income	16
Moderate income	18
Above moderate income	65
Total RHNA Allocation	125

Sixth cycle housing elements are due to the California Department of Housing and Community Development (HCD) by October 15, 2021. SCAG encourages jurisdictions to prepare the draft housing element in advance of the due date to ensure adequate time to address HCD comments and adopt a final housing element. Jurisdictions that do not have a compliant housing element may be ineligible for certain State funding and grant opportunities and may be at risk for legal action from stakeholders or HCD.




VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Memorandum

TO: Tony Stewart, Community Development Director

DATE: May 6, 2021

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

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the City of Port Hueneme General Plan and Housing Element Update

Air Pollution Control District (APCD) staff has reviewed the subject Notice of Preparation (NOP) for the draft environmental impact report (DEIR), which will set forth the City of Port Hueneme's (City) vision of its future and express the goals, policies, and implementation programs as it pertains to land use, health and safety, housing, and resource conservation (Project). All General Plan elements will be updated to reflect current conditions, requirements of Government Code Section 65302, and community preferences. The Project location encompasses the City of Port Hueneme city limits, including the Ventura County Naval Base and the Port of Hueneme. The Lead Agency for the project is the City of Port Hueneme.

General Comments

The General Plan Update will address topics and issues pursuant to state requirements adopted since the existing General Plan was comprehensively updated in the 1990s. Of these topics listed in the NOP, the Air Quality and Climate Change sections will be reviewed by the Ventura County APCD.

Air Quality Section- The air quality assessment should consider project consistency with the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP presents Ventura County's strategy (including related mandated elements) to attain the 2008 federal 8-hour ozone standard by 2020, as required by the federal Clean Air Act Amendments of 1990 and applicable U.S. EPA clean air regulations. The 2016 AQMP uses an updated 2012 emissions inventory as baseline for forecasting data, SCAG RTP 2016 data, and CARB's EMFAC2014 emission factors for mobile sources. The AQMP can be downloaded from our website at <http://www.vcapcd.org/AQMP-2016.htm>.

The Ventura County Air Quality Assessment Guidelines (AQAG) is recommended to evaluate all potential air quality impacts. The AQAG are also downloadable from our website here: <http://www.vcapcd.org/environmental-review.htm>. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide emissions and particulate matter from all project-related motor vehicles, sources not permitted with APCD, and construction

equipment that may result from potential buildout, as appropriate to future development policies and implementation measures. We note that the AQAG has not been updated since 2003 and serves as a reference and is not required or mandated by the APCD (AQAG, Page 1-1). Current air quality determinations follow the same methodology but using different tools (CalEEMod vs. URBEMIS, updated OEHHA standards for toxics). The recommended list of mitigation measures in the AQAG are also limited and outdated. For example, the following template is currently being recommended by APCD as a Commenting Agency for projects that include construction equipment, reflecting state laws adopted since the AQAG was last updated in 2003:

Construction Equipment

Purpose: In order to ensure that ozone precursor and particulate emissions from diesel-powered mobile construction equipment are reduced to the greatest amount feasible.

Requirement: The Permittee shall comply with the provisions of all applicable California State Laws and APCD Rules and Regulations regarding portable construction equipment and construction vehicles.

Documentation: The project applicant shall ensure compliance with the following State Laws and APCD requirements:

- I. Construction equipment shall not have visible emissions greater than 20% opacity, as required by APCD Rule 50, Opacity.
- II. All portable diesel-powered equipment over 50 BHP shall be registered with the State's Portable Equipment Registration Program (PERP) or an APCD Portable Permit.
- III. Off-Road Heavy-Duty trucks shall comply with the California State Regulation for In-Use Off-Road Diesel Vehicles (Title 13, CCR §2449), the purpose of which is to reduce NO_x and diesel particulate matter exhaust emissions.
- IV. On-Road Heavy-Duty trucks shall comply with the California State Regulation for In-Use On-Road Diesel Vehicles (Title 13, CCR §2025), the purpose of which is to reduce NO_x and diesel particulate matter exhaust emissions.
- V. All commercial on-road and off-road diesel vehicles are subject to the idling limits of Title 13, CCR §2485, §2449(d)(3), respectively. Construction equipment shall not idle for more than five (5) consecutive minutes. The idling limit does not apply to: (1) idling when queuing; (2) idling to verify that the vehicle is in safe operating condition; (3) idling for testing, servicing, repairing or diagnostic purposes; (4) idling necessary to accomplish work for which the vehicle was designed (such as operating a crane); (5) idling required to bring the machine system to operating temperature, and (6) idling necessary to ensure safe operation of the vehicle. It is the Permittee's responsibility to have a written idling policy that is made available to operators of the vehicles and equipment and informs them that idling is limited to 5 consecutive minutes or less, except as exempted in subsection a. above.

The following are recommended emission reduction measures for construction equipment and vehicles:

- I. Diesel powered equipment should be replaced by electric equipment whenever feasible.
- II. Maintain equipment engines in good condition and in proper tune as per manufacturer's specifications.

- III. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.
- IV. Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, if feasible.
- V. Use of Tier 3 and Tier 4 off-road construction equipment shall be used, if feasible.

GHG Section- Neither APCD nor the County has adopted a threshold of significance applicable to Greenhouse Gas (GHG) emissions from discretionary projects. On November 8, 2011, APCD published a report at the request of the Ventura County Air Pollution Control Board to report back on possible GHG thresholds options. The District will be looking into what GHG threshold is best suitable for Ventura County in the near future which will undergo a public review process.

The following are recommended guidance documents that could be used to address the impacts of climate change and greenhouse gases in Ventura County.

On May 2016, the CARB published a Mobile Source Strategy. In this report, ARB staff is outlining a mobile source strategy that simultaneously meets air quality standards, achieves GHG emission reduction targets, decreases toxics health risk, and reduces petroleum consumption from transportation emissions over the next fifteen years. These goals and targets include These include 1) Attaining federal health-based air quality standards for ozone in 2023 and 2031 in the South Coast and San Joaquin Valley, and fine particulate matter (PM2.5) standards in the next decade; 2) Achieving greenhouse gas (GHG) emission reduction targets of 40 percent below 1990 levels by 2030, with continued progress towards an 80 percent reduction by 2050; 3) Minimizing health risk from exposure to toxic air contaminants; 4) Reducing our petroleum use by up to 50 percent by 2030; and 5) Increasing energy efficiency and deriving 50 percent of our electricity from renewable sources by 2030. The report can be found here: <https://www.arb.ca.gov/planning/sip/2016sip/2016mobsr.htm>.

On November 2017, the California Air Resources Board published its latest Climate Change Scoping Plan. The Scoping Plan lays out a strategy for achieving California's 2030 Greenhouse Gas target and builds on the state's successes to date, proposing to strengthen major programs that have been a hallmark of success, while further integrating efforts to reduce both GHGs and air pollution. California's climate efforts will 1) Lower GHG emissions on a trajectory to avoid the worst impacts of climate change; 2) Support a clean energy economy which provides more opportunities for all Californians; 3) Provide a more equitable future with good jobs and less pollution for all communities; 4) Improve the health of all Californians by reducing air and water pollution and making it easier to bike and walk; and 5) Make California an even better place to live, work, and play by improving our natural and working lands. The 2017 Climate Change Scoping Plan can be accessed here https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Finally, on December 2018, the Governor's Office of Planning and Research (OPR) published a Draft Technical Advisory. This document incorporates developments since the June 2008 Technical Advisory publication, including regulatory changes made to the regulations that implement CEQA, commonly known as the "CEQA Guidelines" in late 2018 by the California Natural Resources Agency. Although this document largely focuses on project-level analyses of greenhouse gas impacts, Section IV briefly addresses community-scale greenhouse gas reduction plans as one pathway to streamline CEQA analyses. This discussion draft is intended to address some common issues and topics that arise in greenhouse gas emissions analyses under CEQA but is not intended to address every single issue and topic. More information on the OPR's Technical Advisory can be found here <http://opr.ca.gov/ceqa/technical-advisories.html>.

Environmental Justice- The AB 617 legislation sets out an ambitious implementation schedule for APCD. The California Air Resources Board (CARB) must set the overall direction of the program by October 1, 2018. This includes identifying impacted communities, establishing the criteria for air monitoring and local emissions reduction programs, and developing statewide strategies for reducing emissions. The local air districts also have specific roles and responsibilities. On April 27, 2018, the VCAPCD submitted to CARB a technical assessment to develop an initial list of candidate communities for Ventura County.

On July 31, 2018 the Ventura County Air Pollution Control Board approved the District staff's recommendation that the greater Oxnard/Port Hueneme area be the highest priority region in Ventura County for inclusion in CARB's Community Air Protection Program. District staff's recommendation is based on our assessment that we have not identified a single or multiple sources of significant air emissions that would lead us to identify a smaller region adjacent to these source(s). This is in part based on our review of our permitted sources in the area. The greater Oxnard/Port Hueneme area is also home to several agricultural operations and these operations generally utilize pesticides and diesel equipment. In addition, the Port of Hueneme and several warehouse type distribution centers are located in the area. Heavy-duty trucks associated with these goods movement facilities move throughout the area. In summary, we are looking at a diffuse inventory of air pollution sources in this area. This will likely require additional research including community level air monitoring in several locations to identify any sources of concern. In addition, by having a larger area, the VCAPCD will have flexibility to target our incentive funds within the area as we learn more about potential issues with air pollutant sources in and adjacent to the area.

As amended by Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017), Health and Safety Code section 40920.6(c) requires that on or before January 1, 2019, each local air district that is a nonattainment area for one or more air pollutants must adopt an expedited schedule for the implementation of BARCT by the earliest feasible date, but in any event not later than December 31, 2023.

District staff has created a BARCT rule development schedule to comply with this statutory requirement. CARB has identified four affected facilities that are subject to AB 617 BARCT requirements; the facilities are operated by Procter and Gamble, New Indy Container, California Resources (Santa Clara Valley Gas Plant), and Trinity ESC. District staff then evaluated which

District rules are applicable to these facilities that may not meet BARCT requirements including Rule 74.23, *Stationary Gas Turbines*; Rule 74.15, *Boilers, Steam Generators and Process Heaters*; Rule 71.3, *Transfer of Reactive Organic Compound Liquids*; and Rule 74.10, *Components at Crude Oil and Natural Gas Production and Processing Facilities*. In addition, District development of a new rule is proposed to regulate the ozone precursor emissions from oilfield flares to address emissions from a nonemergency flare at the Santa Clara Valley Gas Plant.

A public meeting was held on October 30, 2018 by the District to provide the participants with the list of affected facilities and rules, rule adoption schedules and deadline to submit the written comments. No significant concerns with the proposed rule schedules were expressed by the meeting participants. On December 11, 2018, the Ventura County Air Pollution Control Board will consider approval of District staff's proposed schedule for implementation of Best Available Retrofit Technology (BARCT) to fulfill this mandate under AB 617.

The APCD would like to make the City aware of its Incentive Programs that are directed at reducing emissions of criteria pollutants by reducing the amount of NO_x generated from mobile sources. NO_x when combined with VOC (VOCs) can react with sunlight to create ground-level smog. The two types of programs, Incentive Programs and Transportation Outreach Program, have a co-benefit in indirectly reducing GHG emissions as older, dirtier equipment and vehicles are traded in for newer engines that have stricter air quality emission standards or as Vehicle Miles Travelled (VMT) are reduced due to an increase in alternative modes of transportation. More information can be found [here](#) on our District Incentive Programs Website Page and [here](#) on the Transportation Outreach Program. These existing programs may be included in the City's General Plan Update in the implementation programs discussion if the City should qualify for funding. Some of these programs include Lower Emission School Bus Program, EV Charging Stations Funding and Funding Agricultural Replacement Measures for Emission Reductions (FARMER).

APCD would also like to encourage additional Programs and Implementation Measures that will further reduce the generation of mobile emissions in your jurisdiction. Many of the specific mitigation measures at the project level can be promoted at the plan level through zoning ordinances, parking standards, and design guidelines. These measures are discussed in Section 7.3, *Plan Level Mitigation* and 7.5.2 *Operational Mitigation Measures* of the APCD Air Quality Assessment Guidelines and can include the increased use of bicycle lanes, park-and-ride lots, establishing an employee rideshare program, and supporting a multi-modal transportation system in conjunction with mixed-land use practices.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.