## Santa Monica Mountains Conservancy (SMMC), November 3, 2011

**SMMC**

STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

September 26, 2011

Ms. Lauren Funaiole, Senior Planner
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063-2100

**Simi Valley General Plan Update**
**Draft Environmental Impact Report**

Dear Ms. Funaiole:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency responsible for preservation of wildlife habitat, movement corridors, and open space in and around the City of Simi Valley. The City is conducting a comprehensive update to its General Plan that focuses future development in strategic areas within the City while providing for the protection of the valley's scenic setting and its residents' quality of life. The Conservancy has reviewed the Draft Environmental Impact Report (DEIR) for the General Plan Update and offers the following comments. **SMMC-1**

In general, the plan includes appropriate policies to protect biological resources and provide for mitigation in the event of their loss. In particular, the plan includes policies that protect hillsides, riparian corridors, open space, wildlife corridors, and habitat connectivity, which are all critical landscape features for maintaining the region's biodiversity. With strong implementation of these protections, the City will ensure that residents enjoy the benefits of interconnected, thriving ecosystems for generations to come. **SMMC-2**

The Conservancy offers specific comments and requests clarification on several policies:

**Policy NR-1.5:** Are there proposed Development Code amendments that would affect biological resources? **SMMC-3**

**Policy NR-1.7:** The Conservancy finds development agreements to be an inferior mechanism for protecting open space in perpetuity. Without a conservation easement in favor of an appropriate agency, there is little to no third-party enforcement of development conditions after a project is built. The policy should be revised to specify that development agreements must include conservation easements in favor of a public park and open space agency. **SMMC-4**

Ms. Lauren Funaiole
Simi Valley General Plan Update
September 26, 2011
Page 2

**Policy NR-1.8**: Does this policy propose establishing a formal Transfer of Development Rights (TDR) program? The Conservancy strongly supports creating programs that provide economic incentive for preservation of open space. Other jurisdictions, such as the County of Los Angeles and the City of Santa Clarita, are including establishing TDR programs as part of their respective general plan updates. The Conservancy recommends that the City look to follow their example in this respect. This Policy should be accompanied by an implementation program to create a TDR program in the medium term. **SMMC-5**

**Policy NR-2.4:** This policy should be revised to address light and noise that might deter wildlife from traveling where they are otherwise "able". The Conservancy suggests this language:

> **Habitat Connectivity.** Ensure that projects within areas identified as regional wildlife corridors are designed and constructed so as to preserve the ability of wildlife to travel through the region. Projects shall be designed to minimize edge effects, such as light and noise, that might deter wildlife from using corridors. **SMMC-6**

**Policy NR-2.5:** The Conservancy recommends specifying 5:1 as a minimum that can be increased if recommended by the Department of Fish and Game. The sentence would be revised to read: "Off-site replacement habitat should be at a minimum of 5:1 replacement ratio or, if recommended by the California Department of Fish and Game, at a greater ratio as needed to fully mitigate impacts and encourage impact avoidance." **SMMC-7**

In addition to the previous policy comments, the Conservancy has reviewed the land use map and proposed areas of change. The Conservancy is particularly concerned about the West End Specific Plan Area (Area 6) and the Ronald Reagan Presidential Library Area (Area 11), both of which lie wholly within the South Coast Missing Linkages area.

Area 6 straddles Alamos Canyon, which provides the primary wildlife crossing of SR-118 to the west of Simi Valley. Along with the Santa Susana Pass linkage, this corridor provides an essential pathway for individuals and genetic material to flow from the Santa Susana Mountains through the Simi Hills to the Santa Monica Mountains. While the DEIR does not describe in detail what is proposed for this area, the fact that it is identified as a target area for growth at all is deeply troubling. Any development that reduces wildlife movement through Alamos Canyon would constitute a significant impact on biological resources throughout the Simi Hills and Santa Monica Mountains, threatening the persistence of top predators in these mountain ranges. **SMMC-8**

Ms. Lauren Funaiole
Simi Valley General Plan Update
September 26, 2011
Page 3

Likewise, Area 11 is also well within the Missing Linkages movement corridor west of Simi Valley. As such, development in this area ought to be limited to that which is compatible with the site's environmental resource constraints. To avoid cumulative impacts from development in this focus area, the DEIR should identify movement corridors with greater granularity before projecting growth into sensitive areas. These corridors should then be defined and protected with specific policies. Given its ecological setting, targeting this area for growth is inappropriate. **SMMC-9**

The Conservancy requests additional information about the type of development planned in Areas 6 and 11 so that further analysis and comments may be provided. If the General Plan Update targets these areas for development, biological resources will inevitably be significantly impacted. There are not enough possible mitigation measures that would make an auto dealership, business park complex, or hotel compatible with regional wildlife movement in these locations, given the intensity of those uses and traffic they generate. Road improvements alone in the Alamos Canyon area would decimate wildlife mobility. Given that these areas consists of multiple parcels with varied ownerships, these impacts are properly addressed at the plan level and not deferred to a project-level EIR. To reduce the biological resource impacts of the General Plan Update to be less than significant, the Conservancy recommends directing growth away from these two sensitive locations toward areas in the City that can truly accommodate it. Alternatively, policies that explicitly define large buffer areas and specific crossing improvements are needed. **SMMC-10**

Thank you for the opportunity to comment on the City's General Plan Update. With the additional information requested above, the Conservancy may be able to provide further comments. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128. **SMMC-11**

Sincerely,

ANTONIO GONZALEZ
Chairperson

## County of Ventura Public Works Department (VCPWD), October 28, 2011



**VCPWD**

**From:** Jim O'Tousa [jim.otousa@ventura.org]

**Sent:** Friday, October 28, 2011 8:58 AM

**To:** Laura Hocking

**Cc:** Larry Cardozo

**Subject:** Re: Environmental Document Review #09-055-1; comments due 10-20-11

**Attachments:** Header

Laura,

I am providing the following comments after my review of Section 4.6 Geology and Soils.

1. Liquefaction, page 4.6-17 should state liquefaction has occurred with the City of Simi Valley and should reference CDMG (CGS) Special Publication 116, page 78. VCPWD-1

2. 4.6-20 Local Section for "County of Ventura" should use appropriate reference sections. For example, Grading is governed by Appendix J of the 2010 Ventura County Building Code. Reference to Ventura County 2002 is outdated. VCPWD-2

3. Thresholds, page 4.6-22 the language is outdated for earthquake fault zones and should be updated. The reference to the table 18-1-B of the UBC is outdated should be updated to the new Building Code Table. VCPWD-3

4. Impact 4.6-1 regarding the CBC Chapter 33, the reference is incorrect for the intent of the sentence as chapter 33 only applies to Safeguards during construction and the sentence implies the whole CBC applies. VCPWD-4

5. Page 4.6-

'Impact 4.6-6 Implementation of the General Plan Update could result in development on expansive soils, as defined in Table 18-1-B, or in the creation of..." There is no Table 18-1-B in the 2010 CBC. VCPWD-5

Overall I suggest the prepare go through the document and verify all references to the most up to date source.

Jim O'Tousa

>>> Laura Hocking 09/20/2011 11:21 AM >>>
Please find attached a distribution memo for RMA Reference No. 09-055-1. The documents can be viewed on the RMA intranet site noted in the memo. I do have a few extra CD's -- let me know if you are interested in your own copy.

Please contact me with any problems or questions regarding this transmission.

*Laura Hocking, RMA Tech. III*
*Ventura County Planning Division*
*800 S. Victoria Avenue, Ventura, CA 93009*
*laura.hocking@ventura.org*
*(805) 654-2443*

## Ventura Local Agency Formation Commission (VLAFC), March 12, 2012

**VLAFC**

VENTURA LOCAL AGENCY FORMATION COMMISSION
COUNTY GOVERNMENT CENTER • HALL OF ADMINISTRATION
800 S. VICTORIA AVENUE • VENTURA, CA 93009-1850
TEL (805) 654-2576 • FAX (805) 477-7101
HTTP://WWW.VENTURA.LAFCO.CA.GOV

March 12, 2012

Christine Silver, Senior Planner
City of Simi Valley
Department of Environmental Services
2929 Tapo Canyon Road
Simi Valley, CA 93063-2100

Subject: Simi Valley Draft General Plan Update and EIR

Dear Ms. Silver:

We apologize for the lateness of our comments on the City's Draft General Plan Update and Draft EIR. LAFCo staff was unaware that the City had completed preparation of the documents until February 29 when we received a public hearing notice for the City Planning Commission's March 7 meeting at which the documents were to be considered. LAFCo has no record of being provided either the notice of preparation for the EIR or the notice of completion indicating that the draft EIR was available for public review. In addition, the draft General Plan Update was not referred to LAFCo for a 45-day review period, as directed in Govt. Code § 65352. As a result, we were unable to review and prepare comments on the draft documents prior to the March 7 hearing. In the interest of time, LAFCo staff has conducted only an abbreviated review of the documents. We hope that you are able consider our comments prior to any further action on the documents. VLAFC-1

Based on our abbreviated review, it appears that build out of the General Plan Update will require multiple LAFCo actions, including annexations and sphere of influence amendments. The General Plan Update land use map designates a substantial amount of unincorporated territory located outside City boundaries for urban development. These designations are primarily located on vacant land northwest, northeast, and southeast of the City and include approximately: VLAFC-2

- 300 acres designated industrial, a portion of which extends beyond the City sphere of influence (located north and northwest of the Simi Valley Town Center)
- 65 acres designated moderate and medium density residential (located immediately north of the Simi Valley Town Center)
- 40 acres designated low and medium density residential (at the end of Flanagan Drive northeast of the City)
- 200 acres designated cemetery, a portion of which extends beyond the City sphere of influence (located northwest of the City)
- 4 acres of medium density residential located near the southern end of Yosemite Avenue that is included within the Parker Ranch Expansion Area. In addition, the figure on page 3-7 of the General Plan Update and Figure 3-4 of the EIR indicate

Christine Silver
March 12, 2012
Page 2 of 3

that this expansion area includes an additional 5-acre lot located outside the City boundary and sphere of influence.

- 70 acres designated as AJU (American Jewish University). The General Plan is unclear as to future development plans for this site, though LAFCo staff is aware that residential development was proposed in 2008.

VLAFC-2 Cont.

With the exception of the 70-acre AJU property, these areas are identified by the Land Use and Community Design Element as "Transformation-New Growth" or "Infill" areas the annexation and development of which is anticipated under the General Plan. However, it appears that development of these areas is not included in much of the analysis contained in the EIR, as discussed in more detail below.

Water Supply/Demand

The water demand figures cited in Section 7.17.2 of the EIR for the areas of the General Plan Update that are served by Ventura County Waterworks District No. 8 (a dependent district of the City) are derived from demand estimates contained in the 2010 urban water management plan (UWMP) prepared by the District (p. 4.17-6). According to the UWMP, only anticipated future development within the current City boundaries and within current District boundaries are included in the ultimate water demand analysis. Therefore, it appears that the anticipated urban development of the aforementioned areas located outside of city boundaries is not included in the water demand analysis. Without inclusion of these areas in the water supply/demand analysis, the determination that build out of the General Plan will result in no significant impacts to water supply cannot be supported. LAFCo staff recommends that the EIR be revised to include anticipated water demands from the development of these areas.

VLAFC-3

Wastewater Treatment

According to thresholds of significance cited in Section 4.17.8, implementation of the General Plan Update would result in substantial adverse physical impacts if it would do any of the following:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

VLAFC-4

ADEI-1

According to the EIR (pp 4.17-29,-30), the City's Water Quality Control Plant (WQCP) currently treats nearly 9.6 million gallons a day (mgd) of wastewater during winter months. The WQCP has a 12.5 mgd capacity. According to Table 4.17-6, the implementation of the General Plan Update is anticipated to result in an increase of approximately 2.8 mgd, for a

ADEI-2

Christine Silver
March 12, 2012
Page 3 of 3

total of approximately 12.4 mgd. Build out of the general Plan Update would leave 0.1 mgd in excess capacity. The EIR concludes that the (WQCP) has adequate capacity to accommodate the demands at full build out of the proposed updated General Plan and thus, no significant impact is identified.

However, Table 4.17-6 does not include the wastewater that would be generated from the aforementioned areas located outside of city boundaries. In addition, it does not include wastewater expected to be generated from the West End Specific Plan Area or the Ronald Reagan Presidential Library Area. Because the amount of wastewater generated from development in these areas would exceed 0.1 mgd, it appears that the 12.5 mgd capacity of the WQCP would be exceeded by build out of the General Plan Update. The lack of capacity would seem to be exacerbated if wet weather flows are taken into consideration. According to the aforementioned thresholds of significance, this would result in a significant impact. If construction of new wastewater treatment facilities or expansion of existing facilities is required to accommodate the anticipated amount of wastewater, another of the aforementioned thresholds would be exceeded, unless it can be demonstrated that such construction could not cause significant environmental effects. LAFCo staff recommends that the EIR be revised to account for anticipated wastewater flows from all planned development within the General Plan Update. VLAFC-4 Cont.

LAFCo Use of the General Plan

Pursuant to state law and local polices, during its consideration of an annexation proposal LAFCo will consider, among other factors, land use designations, consistency with the applicable General Plan, and the agency's ability to efficiently provide services to the affected territory. If the City is to pursue annexation of any of the aforementioned areas, LAFCo may utilize the City's General Plan and its EIR in its evaluation as a CEQA lead agency. Thus, both documents should take into consideration the potential impacts from annexation of these areas.

Thank you for your consideration of our comments. Please do not hesitate to contact me should you have any questions. VLAFC-5

Sincerely,

Kai Luoma, AICP
Deputy Executive Officer

c: LAFCo Commissioners

## Ventura Local Agency Formation Commission (VLAFC2), April 11, 2012

**VLAFC2**

VENTURA LOCAL AGENCY FORMATION COMMISSION
COUNTY GOVERNMENT CENTER • HALL OF ADMINISTRATION
800 S. VICTORIA AVENUE • VENTURA, CA 93009-1850
TEL (805) 654-2576 • FAX (805) 477-7101
HTTP://WWW.VENTURA.LAFCO.CA.GOV

April 11, 2012

Christine Silver, Senior Planner
City of Simi Valley
Department of Environmental Services
2929 Tapo Canyon Road
Simi Valley, CA 93063-2100

Subject: Simi Valley Draft General Plan Update and EIR

Dear Ms. Silver:

We again apologize for the lateness of our comments, but upon further review of the City's Draft General Plan update and EIR, we noted that the diagrams in the documents depicting the jurisdictional boundary of the Ventura County Waterworks District No. 8 do not appear to be accurate. We have also identified some apparent deficiencies in the EIR's discussion of water availability. In addition, we find no map or description of the areas to which the City provides sewer service. Because the General Plan will guide future development in and around the City for many years to come, it is important that the information contained in the General Plan regarding the availability of municipal services be accurate. VLAFC2-1

**Ventura County Waterworks District No. 8**

Ventura County Waterworks District No. 8 (VCWWD 8 or District) is a dependent district of the City that provides potable water service to the majority of the territory within City boundaries, as well as substantial territory outside of the City's jurisdiction.

*VCWWD 8 Boundaries*

No city or special district in the State can determine its own boundaries or service area. Those determinations were reserved by the State and are functions the State has delegated to LAFCos. LAFCos are also responsible for updating and maintaining boundary information. Thus, if there are any discrepancies between LAFCo information and city and/or district boundary information, the LAFCo information prevails. Each of the exhibits and diagrams contained in the General Plan Update and EIR that depict the VCWWD 8 boundary and service area are not entirely consistent with LAFCo records. VLAFC2-2

Attached is a map that identifies those areas, based on LAFCo records, which should be added to or removed from the boundary of VCWWD 8 depicted on each of the following figures and exhibits in the General Plan Update and the EIR:

- According to the EIR, Figure 4.17-1 depicts the areas served by the District and the Golden State Water Company (GSWC). However, it is unclear whether the area identified as the District is the area currently being served by the District or the area within the District boundary:

Christine Silver
April 11, 2012
Page 2 of 5

- If depicting the area being served, Area 4 (and perhaps Areas 7 and 8 ) should be removed
- If depicting the District boundary, Areas 1 and 6 should be added, Areas 2, 4, 5, 7, and 8 should be removed

- Exhibit 2 of the Water Supply Assessment (WSA), which is Appendix G of the EIR, should be revised, as follows:
  - Areas 1, 3, and 6 should be added
  - Areas 2, 4, 5, 6, 7 and 8 should be removed

- Exhibits I-1, I-2, II-1, III-1 and III-2 of the District's 2010 Urban Water Management Plan (UWMP), upon which the EIR relies, should be revised, as follows:

  - Areas 1, 3, and 6 should be added
  - Areas 2, 4, 5, 6, 7 and 8 should be removed

VLAFC2-2 Cont.

*Water Supply Assessment*

As noted, Appendix G of the EIR is the WSA prepared for the General Plan update. The purpose of a WSA is to determine if adequate water will be available to serve a project, in this case, the build out of the General Plan. As a "water demand project" the General Plan Update EIR is required to contain a WSA (CEQA Guidelines § 15155). In order to determine if VCWWD 8 will have adequate water supply to provide for General Plan build out, it must be determined that the District will have an adequate water supply available for the City, *as well as for the areas outside the City to which the District provides service*. However, according to the WSA:

> "The "study area" for the Water Supply Assessment (WSA) report is defined as that portion of Ventura County Waterworks District No. 8 service boundary within City limits; therefore, [it] excludes…area outside the City limits." (underline added)

VLAFC2-3

The WSA does not evaluate the water supply and demand for areas outside the City that are served by the District. Therefore, the WSA cannot be relied upon to determine whether VCWWD 8 will have an adequate water supply to meet the anticipated water demands of the City's General Plan Update.

According to the WSA, it is "prepared as a technical study in support of CEQA documentation for future development in the City of Simi Valley 2030 General Plan." However, we find no reference to any of the data or conclusions of the WSA within the text of the EIR. In fact, the data and conclusions of the WSA, which relies on the District's outdated 2005 UWMP, conflict with those of the EIR, which relies on the District's updated 2010 UWMP. For instance, the WSA estimates that the General Plan build out will result in an increase in water demand of 5,666 acre feet per year (afy), but the EIR estimates the increase to be 3,167 afy. The WSA estimates ultimate water supply of over 40,500 afy, but the EIR estimates ultimate supply to be 33,265 afy. Thus, it appears that the document prepared to support the EIR presents data and conclusions that conflict with the EIR. LAFCo staff found the conflicting data confusing and misleading. Because a WSA is required to be a part of the EIR, the WSA should be amended so that it is consistent with the text of the EIR and can support its conclusions.

VLAFC2-4

Christine Silver
April 11, 2012
Page 3 of 5

VCWWD 8's 2010 Urban Water Management Plan

The analysis and conclusions contained in the EIR rely almost exclusively on VCWWD 8's 2010 UWMP, which was adopted in June 2011 and is intended to be the latest and most reliable data pertaining to the District's long term water supply and demand. In fact, the 2010 UWMP includes in its demand analysis the land use designations that are proposed as part of the City's General Plan Update. It also includes demand projections for areas outside the City limits. Based on the 2010 UWMP's estimated supply capacity of 33,265 afy at build out of the General Plan, the EIR concludes that:

> "The District's 2010 UWMP projected a total demand of 33,265 afy in 2035, while ultimate build out of the General Plan would result in a demand of 28,728 afy in the District's service area within the City. Therefore, the ultimate General Plan build out demand are within the total District ultimate estimated capacity."

The UWMP (and EIR) concludes that demand will exactly meet supply in 2035, resulting in a less than significant impact. In fact, the UWMP concludes that demand will exactly match supply at every stage of development of the General Plan (see Table V-1 of the UWMP), as follows:

| | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|---|
| Demand (afy) | 25,231 | 26,458 | 28,152 | 29,851 | 31,556 | 33,265 |
| Supply (afy) | 25,231 | 26,458 | 28,152 | 29,851 | 31,556 | 33,265 |
| **Difference** | **0** | **0** | **0** | **0** | **0** | **0** |

VLAFC2-5

Thus, any unaccounted for demand would cause demand to exceed supply. Based on LAFCo staff's review of the 2010 UWMP and EIR, the following water demands are unaccounted for in the 2010 UWMP (and thus the EIR):

- In determining water demand within the District boundary, the UWMP states:

  > "The County of Ventura's General Plan does not anticipate growth within the [Waterworks] District prior to [2035]. Therefore, it is assumed that no future development within unincorporated county area of the District will occur within the 2035 planning horizon of the 2010 UWMP."

  Based on discussions with County Planning staff, the assumption that no future development will occur within the unincorporated area of the District for the next 23 years is not accurate and there is nothing in the County of Ventura General Plan to suggest this. Section 3.2.2.2 of the County General Plan contains policies and land use maps for the County's Existing Communities, four of which are within the VCWWD 8 boundary. These four Communities include, but are not limited to, approximately:

  - 82 acres designated Residential Estate (1 unit/acre)
  - 410 acres designated Residential Estate (2.18 – 4.36 units/acres)
  - 2 acres designated Residential High Density (up to 20 units/acre)
  - 6 acres designated Commercial (approximately 41,000 square feet of floor area)

Christine Silver
April 11, 2012
Page 4 of 5

There are hundreds of vacant and/or underutilized parcels within these communities that can be developed. In fact, the County is currently considering a General Plan amendment on vacant property in the Santa Susanna Knolls community to allow for a 100-unit residential development. Another site is identified for high-density, multi-family residential development. In addition, County Planning staff noted that there are hundreds of vacant parcels located outside these Communities that are zoned Open Space, upon which a residence is a permitted and ministerial use. Therefore, the County General Plan anticipates, and plans for, potentially several hundred additional units to be constructed within the District boundary. It appears that the District also envisions increased future demand in these areas, as we understand that the District is planning for construction of a new 1 million gallon water tank in the Santa Susana Knolls community to replace an older, much smaller tank. The water demands for this anticipated development should be included in the UWMP and EIR. VLAFC2-5 Cont.

- To determine projected water demands, Table III-5a of the UWMP (which is the same as Table 4.17-5 of the EIR) uses the City land use designations proposed by the General Plan Update within the City limits and the County land use designations currently existing in the unincorporated area (though, as discussed above, the land use designations and development potential in the unincorporated area are significantly understated). Additional demand attributed to such things as water loss and the sale of water to another water purveyor are identified in Table III-6. However, as noted in our previous letter dated March 12, the City's General Plan Update identifies approximately 300 acres of industrial development, 65 acres of moderate and medium density residential development, 40 acres of low and medium density development, and 200 acres for a cemetery located outside of the City limits but within the City sphere of influence and for which annexation to the City (and thus to the District) is anticipated. It does not appear that these areas are included in any of the aforementioned tables in the UWMP or EIR. Thus, it appears that UWMP (and the EIR) does not take into consideration water demands from any of this anticipated development. VLAFC2-6

The EIR's conclusions rely on the District's 2010 UWMP. However, it appears that the UWMP does not accurately account for projected demand within the District. When this demand is accounted for, it appears that the District will not have adequate water supply to meet projected demand in either normal or dry years. At a minimum, the District's 2010 UWMP should be amended to more accurately reflect the anticipated development potential included in the City General Plan Update and the County General Plan, as discussed above. Only then can it be determined whether adequate water supply will be available for build out of the General Plan Update. VLAFC2-7

One of the thresholds of significance identified in Section 4.17.4 of the EIR states that implementation of the General Plan Update would result in substantial adverse physical impacts if it would require new or expanded entitlements in order to have sufficient water supplies available to serve the project in addition to existing entitlements and resources. Based on the above discussion, it appears that this threshold has been exceeded. Until such analysis occurs demonstrating otherwise, this should be considered to be a significant impact. VLAFC2-8

LAFCo staff makes every effort to provide timely comments on projects that are relevant to future LAFCo actions. However, similar to the General Plan Update and EIR, LAFCo has no record of being notified that the 2010 UWMP had been completed, that it was available for VLAFC2-9

Christine Silver
April 11, 2012
Page 5 of 5

public review, or that it was considered for adoption in June 2011. LAFCo had not reviewed the 2010 UWMP until now. VLAFC2-9 Cont.

**Sewer Service**

LAFCo approved a merger of the Simi Valley County Sanitation District with the City of Simi Valley in 1995. The merger authorized the City to continue to provide sewer service to certain areas outside of the City boundary that were located within the District boundary at the time of the merger. Based on LAFCo records, the attached map depicts the current sewer service area, which includes the Ronald Reagan Presidential Library, the Brandeis-Bardin Institute, the Santa Susanna Knolls community, and the unincorporated islands surrounded by the City. LAFCo staff recommends that the General Plan Update and/or the EIR include a map depicting the sewer service area. VLAFC2-10

In addition, it should be noted that the General Plan Update and EIR provide little or no analysis regarding future sewer demand for areas outside City boundaries that are not likely to annex to the City in the foreseeable future, such as in the Santa Susanna Knolls. As noted above, the County General Plan allows for and anticipates substantial development in this area.

The boundaries of Waterworks District No. 8 and the City sewer service area have been a topic of discussion between LAFCo and City staff for several years. We would be happy to provide more specific documentation should any confusion remain regarding these boundaries.

Thank you for your consideration of our comments. Please do not hesitate to contact me should you have any questions. VLAFC2-11

Sincerely,

Kai Luoma, AICP
Deputy Executive Officer

Attachments: Map of Waterworks No. 8 Boundary
Map of City Sewer Service Area

c: LAFCo Commissioners
Ron Fuchiwaki, Simi Valley Department of Public Works
Chris Stephens, Ventura County RMA
Cy Johnson, Calleguas Municipal Water District

# 9.3 RESPONSES TO COMMENTS ON THE DRAFT EIR

## 9.3.1 State Departments

### California Department of Fish and Game (CDFG), September, October 20, 20112

CDFG-1 This comment contains introductory and general information. The comment also acknowledges and concurs that the General Plan policies identified in the EIR and compliance with federal, state and local regulations would reduce potential impacts to biological resources to less than significant levels, as identified in the EIR. No further response is required.

### Office of Planning and Research (OPR), October 27, 2011

OPR-1 This comment contains introductory and general information regarding OPR's role and responsibilities. No further response is required.

OPR-2 This comment summarizes the proposed project and is not a comment on the adequacy of the proposed project. No further response is required.

### Native American Heritage Commission (NAHC), October 27, 2011

NAHC-1 This comment contains introductory and general information and summarizes the requirements for the preparation of an EIR as it relates to cultural or archeological resources. The comment has been noted, and no further response is required.

NAHC-2 This comment contains measures recommended by the NAHC to assess and mitigate potential impacts to archaeological impacts, including contacting regional archaeological Information Centers and the NAHC, site specific surveys, and mitigation measures for the identification and evaluation of accidentally discovered resources.

As stated on EIR page 4.5-5, to gather information on known cultural resources within the Planning Area, a records search was conducted by an Atkins archaeologist at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) at the California State University, Fullerton. The SCCIC is one of twelve regional Information Centers that comprise the California Historical Resources Information System (CHRIS). CHRIS works under the direction of the California Office of Historic Preservation (OHP) and the State Historic Resources Commission (SHRC). The SCCIC houses information about historical resources (e.g., location, size, age, etc.) within Ventura, Los Angeles, and Orange Counties per CHRIS standards. Further, and as described under Impact 4.5-1 on EIR pages 4.5-24 and 4.5-25, the General Plan Update includes goals and policies providing for the management and protection of significant archaeological resources.

Specifically, proposed Policy HR-2.1 (New Development Activities) requires that new development protect and preserve archaeological resources from destruction, and avoid and/or mitigate impacts to such resources through planning policies and permit conditions. Policy HR-2.2 (Grading and Excavation Activities) requires that a qualified archeologist monitor all grading and/or excavation where there is a potential to affect archeological resources, and, if resources are found, recommendations of the archeologist would be implemented subject to the approval of the City to ensure that resources encountered are analyzed, classified, recorded and preserved to the greatest extent feasible.

Senate Bill 18 (Government Code Sections 65352.3 and 65352.4) requires that, prior to the adoption or amendment of a general plan proposed on or after March 1, 2005, a city or county must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects located within that jurisdiction. The City contacted the NAHC in February 2007 and requested a Tribal Consultation list pursuant to SB 18. The NAHC responded on February 23, 2007, and provided contact information for the Santa Ynez Band of Mission Indians. Additionally, as stated on EIR page 4.5-1, the City conducted a search of the Native American Heritage Commission Sacred Lands File was conducted. As further stated on EIR page 4.5-10:

> The NAHC response letter indicated that no Native American cultural resources have been recorded within the immediate Planning Area, but that the NAHC files are not exhaustive, and the results of the searches do not preclude the presence Native American resources. The NAHC letter also listed local Native American organizations and individuals who may have knowledge of cultural resources in the General Plan Update area (NAHC 2010). As requested by the NAHC, a letter that included a brief description of the project and a project map were sent to each of the NAHC-provided contacts. As of the publication of this document, one response has been received from the Santa Ynez Band of Mission Indians. Mr. Fred Romero called the Atkins offices and spoke with an Atkins archaeologist about the General Plan Update project on March 10, 2010. Mr. Romero indicated that he would offer no comment on the project due to the fact that other Tribal groups or individuals with territories in closer proximity to Simi Valley would be better suited to comment. Further, Mr. Romero wanted to ensure that all of the NAHC provided contacts received a similar information request letter with project information.

The General Plan Update also includes Policy HR-2.3 (Cultural Organizations), which requires that cultural organizations, including Native American organizations, are notified of proposed developments that have the potential to adversely impact cultural resources and that representatives of such groups are allowed to monitor grading and/or excavation of development sites. Because the General Plan Update includes policies that require identification and mitigation of impacts on unique paleontological resources or sites as well as implementation programs to ensure compliance with these policies, impacts to Native American resources would be less than significant. No further response is required.

## California Department of Transportation (Caltrans), September 8, 2011

Caltrans-1 This comment contains introductory and general information. No further response is required.

Caltrans-2 This comment states that Caltrans offers financial assistance through the Community Based Transportation Grant Program and that the City considers utilizing this funding source to assist in the implementation of projects that will maximize the use of pedestrian facilities and healthy communities. As this comment does not pertain to the adequacy of the EIR, this comment is noted. No further response is required.

Caltrans-3 This comment pertains to bicycle and pedestrian facilities within the City, specifically, the comment asks if counts were performed for pedestrians and/or bicyclists; that sidewalk paths are not intended for bicyclists; that future designs for bikeways should follow standards specified in the Highway Design Manual (HDM) and the CA MUTCD; and that the City incorporate safe routes to schools and pedestrian safety features in the General Plan.

Bicycle and pedestrian counts were not included as part of the analysis for the EIR, rather, the EIR utilized data presented in the 2008 City of Simi Valley Bicycle Master Plan. As stated on page 4.16-29, "The 2008 Bicycle Master Plan identified safety, access, quality of life, and an effective implementation program as four key issues to making Simi Valley a bicycle friendly city… Although not a designated bikeway classification type specified in the Caltrans manual Chapter 1000, the City of Simi Valley has several sidewalk paths that were built with bicycling in mind. These typically are sidewalks that are slightly wider than normal sidewalks, and are intended for a mix of pedestrian and bicycle traffic."

Further, and as described on pages 4.16-45 and 4.16-46, the General Plan Update includes goals and policies that encourage and promote the use and provision of alternative modes of transportation, including Policy M-8.4 which requires that discretionary development incorporate sidewalks and bicycle pathways, bicycle racks, and lockers. Policies M-1.3, M-1.4, and M-1.6 set forth means by which the City will implement Complete Streets. Policy M-1.7 states that the City will work with regional agencies to secure alternative travel mode funding. Future dedicated bikeways would be developed in accordance with state and local standards. As this comment does not pertain to the adequacy of the EIR, this comment is noted. No further response is required.

Caltrans-4 This comment provides a conclusion statement regarding the EIR review. The comment has been noted, and no further response is required.

## 9.3.2 Regional Agencies

### County of Ventura, Planning Division (CoV), October 24, 2011

CoV-1 This comment contains introductory, general information and a summary of the proposed project. No further response is required.

CoV-2 This comment contains introductory and general information regarding the County of Ventura's role and responsibilities. No further response is required.

### Ventura County Watershed Protection District (Planning and Regulatory Division) (VCWPD1), October 24, 2011

VCWPD1-1 This comment contains introductory, general information and a summary of the proposed project. No further response is required.

VCWPD1-2 This comment summarizes the findings of the EIR in Section 4.9 (Hydrology/Water Quality) and is not a comment on the adequacy of the EIR.

VCWPD1-3 The comment suggests that the EIR incorporate mitigation measures to address existing flood hazards within the City. The existing areas of potential flooding are identified on pages 4.9-10 and 4.9-2 (100-Year Flood Event Areas), which depicts the 100-year flood event boundaries and the related watershed area for the major watercourses in the Planning Area. As described, the majority of the areas that are within the 100-year floodplain are located within and directly adjacent to the Arroyo Simi and its tributaries. A significant portion of the flood zone is located within open space areas of the City or in low-density residential or commercial areas. Further, as stated on EIR page 4.9-33:

> The Community Safety chapter of the General Plan Update has established a goal to protect human life and public and private property from the risks of flooding. The Safety section includes flood policies that, if implemented, would achieve this goal. These policies include S-8.1, S-8.2, S-8.3, S-8.4, S-8.6, and S-8.7.
>
> Furthermore, future development contemplated in the General Plan Update would be subject to the City's Floodplain Ordinance, the Ventura County Flood Management Plan, and FEMA requirements. These regulations require that all structures located within the floodplain be flood-proofed, as appropriate, to ensure that encroachment would not cause any increase in downstream or upstream flood levels and that the structures would be built at elevation above the floodplain. In addition, compliance with the Flood Mitigation Strategies set forth in the Simi Valley MHMP would further reduce any potential impacts.

As such, the proposed project would not result in significant flooding hazards, as the identified General Plan policies would serve to reduce the risk of potential flood hazards. The General Plan and the EIR were developed to guide future development, and all future development under the General Plan would adhere to the identified

policies, as well as local, state and national requirements to reduce potential impacts from flooding hazards.

VCWPD1-4 Please refer to Responses to Comments VCWPD1-3. The comment states that future population (and subsequent residential, commercial, office, business park and industrial use) increases would result in new stormwater generation, which would add to existing stormwater runoff issues. The EIR evaluated potential impacts associated with increased stormwater generation under Impact 4.9-1, Impact 4.9-3, and Impact 4.9-4 of Section 4.9. General Plan Update Policy IU-3.12 (Federal and County Regulations), requires future development contemplated under the General Plan Update implement the latest requirements of the NPDES regulations, including the use of Best Management Practices by businesses in the City; Policy IU-4.3 (Drainage Plans), requires developers to prepare project-specific drainage plans for proposed developments that meet integrated water quality, flow reduction, and resources management criteria, as technically feasible; define needed drainage treatment and runoff controls (BMPs) per City standards; and comply with the City's most current NPDES MS4 Permit and Master Plan of Drainage; Policy IU-4.4 (Post-Construction Runoff) imposes requirements to control post-construction stormwater runoff discharge rates and velocities to prevent or reduce downstream erosion and protect stream habitat and private property in accordance with the City's most current NPDES MS4 Permit and Master Plan of Drainage; Policy IU-4.5 (Permeable Surfaces) limits the amount of impervious surfaces that would be developed for new large scale development; Policy IU-4.6 (Conservation of Open Space Areas) provides for the conservation of undeveloped open space areas and drainage channels as practical for the purpose of protecting water resources and water quality in the City's watersheds; Policy IU-4.7 (Protection of Water Bodies), and Policy NR-5.2 (Protect Open Space Areas and Water Resources), requires new development to protect the quality of water bodies and natural drainage systems through site design, stormwater treatment, and stormwater BMPs.

As these policies require implementation of BMPs, incorporation of stormwater detention facilities, design of drainage facilities to minimize adverse effects on water quality, and minimization of increases in impervious areas, the implementation of these policies would reduce the volume of stormwater runoff discharging from sites within the Planning Area. As such, the EIR fully analyzed the potential impacts of new development related to increased stormwater discharge, and no further response is required.

VCWPD1-5 Please refer to Responses to Comments VCWPD1-3 and VCWPD1-4. The General Plan update includes specific policies designed to reduce the volume of stormwater runoff and include the incorporation of stormwater detention facilities. Further, individual projects would be required to comply with all City, regional, state, and federal regulations to reduce potential impacts to the Arroyo Simi. Therefore, the EIR

fully analyzed potential impacts due to potential increases in runoff and found impacts to be less than significant. No further response is required.

VCWPD1-6 The comment states that increased demand for wastewater would cause an increase in effluent flows to receiving streams. The EIR on page 4.17-28 states:

> New development under implementation of the General Plan Update would continue to comply with all provisions of the NPDES program, as enforced by the RWQCB. Therefore, implementation of the General Plan Update would not result in an exceedance of wastewater treatment requirements. All future projects under the General Plan Update would be required to comply with all applicable industrial wastewater discharge requirements issued by the SWRCB and RWQCB.

Future development under the General Plan Update would be required to comply with federal, state, regional, and local regulations, and the proposed goals and policies identified to reduce potential impacts related to increased wastewater flows would be less than significant. No further response is required.

VCWPD1-7 The comment states that the VCWPD's Calleguas Creek Watershed Hydrology Study indicates that discharge flow rates within the Arroyo Simi will increase by an average of 1.5 times between the present condition and the projected future condition for Arroyo Simi. The EIR identified specific General Plan policies that would reduce potential impacts to the Arroyo Simi due to an increase in flow rates, including, but not limited to, Policies IU-4.1, IU-4.2, IU-4.3, IU-4.4, and IU-4.5, as well as compliance with existing local, state and federal regulations. Policy IU-4.1 (Storm Drain Improvements), requires improvements to the existing storm drain facilities within the City, and Policy IU-4.2 (Adequate Drainage Facilities and Master Plan), requires that all new drainage facilities are adequately sized and constructed to accommodate stormwater runoff and prevent flooding. Refer also to Response to Comment VCWPD1-3 for further description of how General Plan Update Policies would reduce impacts associated with increased discharges into the Arroyo Simi. Additionally, compliance with NPDES permits requirements, Chapter 12 of the Municipal Code, and General Plan Update policies would ensure that increases in discharges to the Arroyo Simi from individual projects developed under the General Plan are less than significant.

VCWPD1-8 The comment states that mitigation of existing flood hazards could be treated more fully in the EIR. Refer to Response to Comment VCWPD1-3. All future development under the General Plan would adhere to the identified policies, as well as local, state and national requirements to reduce potential impacts from flooding hazards.

## Ventura County Watershed Protection District (Groundwater Section) (VCWPD2), October 24, 2011

VCWPD2-1 This comment contains general information and states that the focus of the EIR review concentrated on groundwater extraction and the potential impacts to groundwater levels. As this comment was not regarding the adequacy of the EIR, no further response is required.

VCWPD2-2 This comment summarizes the groundwater discussion found in Section 4.9 (Hydrology/Water Quality) of the EIR. As this comment was not regarding the adequacy of the EIR, no further response is required.

VCWPD2-3 This comment states that the EIR should clarify when and where groundwater basin overdraft occurs and what effect overdraft conditions have on surface water flows. As noted on EIR page 4.9-31, the Basin is not identified in overdraft condition. Further, the Ventura County Watershed Protection District (VCWPD) 2010 Urban Water Management Plan (UWMP), utilized in preparation of the EIR, states that the Basin is not identified in overdraft condition. The VCWPD states that groundwater extraction for the District's non-potable water uses, is not expected to overdraft the ground water basin, yet still provide reliable supply during average and dry water years.

It is not possible to predict when and where groundwater overdraft would occur due to development under the General Plan. The purpose of an EIR is to evaluate the potential impacts that could occur with implementation of a proposed project. Because the purpose of an EIR is to assess the project's effects on the existing environment, an EIR need not resolve existing environmental problems, and an EIR need not resolve existing environmental problems that will not be made worse by implementation of the proposed project. The EIR analyzed the impacts of the total allowable development that could occur with implementation of the General Plan. The EIR evaluated the potential for impacts to groundwater resources to occur, including overdraft conditions, and found those impacts to be less than significant with implementation of General Plan Update Policies IU-4.5, IU-4.6, NR-5.1, NR-5.5, and NR-8.7, which would help to reduce any potential impacts on groundwater recharge associated with future development.

VCWPD2-4 The comment states that the EIR should include a table showing the past annual discharge volumes of treated wastewater and groundwater from dewatering systems into the Arroyo Simi, as well as the total dissolved solids (TDS) of each source. The EIR relied upon available information provided by several state and local agencies, including, but not limited to the California Department of Water Resources (DWR), the Los Angeles Regional Water Quality Control Board (LARWQCB), the Watersheds Coalition of Ventura County, the Calleguas Municipal Water District (Water District), and the Ventura County Watershed Protection District (VCWPD). The data requested by the commenter for inclusion in the EIR was not available within the documents utilized in preparation of the EIR. Further, past annual

discharge volumes would not alter the analysis and conclusions presented in EIR Section 4.9 (Hydrology/Water Quality). The EIR identified General Plan policies that would insure that water quality is not significantly impacted due to future development contemplated under the General Plan Update. These include Policy IU-4.5 (Permeable Surfaces) limits the amount of impervious surfaces that would be developed for new large scale development; Policy IU-4.6 (Conservation of Open Space Areas) provides for the conservation of undeveloped open space areas and drainage channels as practical for the purpose of protecting water resources and water quality in the City's watersheds; Policy IU-4.7 (Protection of Water Bodies), and Policy NR-5.2 (Protect Open Space Areas and Water Resources), requires new development to protect the quality of water bodies and natural drainage systems through site design, stormwater treatment, and stormwater BMPs. Refer also to Response to comment VCWPD2-3. No further response is required.

VCWPD2-5 The comment states that the EIR should be revised to include a table that quantifies annual groundwater extraction from all groundwater basins, including Gillibrand, Simi Valley, and Conejo-Tierra Rejada. Details of annual groundwater extraction and imported water are provided on page 4.17-5 of the EIR. The current and projected water supplies for the Ventura County Waterworks District No. 8 (VCWD) and the Golden State Water Company (GSWC) were derived from their Urban Water Management Plans (UWMPs) and are shown in Table 4.17-1 (VCWWD No. 8 Recent and Projected Water Supply [afy]) and Table 4.17-2 (GSWC Recent and Projected Water Supply [afy]), respectively, and included below in response to this comment. No further response is required.

**Table 4.17-1 VCWWD No. 8 Recent and Projected Water Supply (afy)**

| | Year | | | | | |
|---|---|---|---|---|---|---|
| ***Source*** | ***2006-2010*** | ***2015*** | ***2020*** | ***2025*** | ***2030*** | ***2035*** |
| Imported—Calleguas | 23,312 | 25,178 | 26,842 | 28,541 | 30,246 | 31,955 |
| Local Groundwater | 785 | 1,200 | 1,200 | 1,200 | 1,200 | 1,200 |
| Recycled Water | 63 | 80 | 11 | 110 | 110 | 110 |
| *Total Water Supply* | *24,160* | *26,458* | *28,152* | *29,851* | *31,556* | *33,265* |

SOURCE: VCWWD No. 8 Urban Water Management Plan 2010.

**Table 4.17-2 GSWC Recent and Projected Water Supply (afy)**

| | Year | | | | | |
|---|---|---|---|---|---|---|
| ***Source*** | ***2005*** | ***2010*** | ***2015*** | ***2020*** | ***2025*** | ***2030*** |
| Imported—Calleguas | 8,130 | 8,618 | 7,291 | 7,878 | 8,453 | 9,019 |
| Local Groundwater | 840 | 840 | 2,508 | 2,508 | 2,508 | 2,508 |
| Recycled Water | 0 | 0 | 0 | 0 | 0 | 0 |
| *Total Water Supply* | *8,970* | *9,458* | *9,799* | *10,386* | *10,961* | *11,527* |

SOURCE: GSWC Urban Water Management Plan 2005.

VCWPD2-6 The comment summarizes the findings regarding groundwater storage as detailed in the EIR. The comment also notes that future water supply may be served by recycled water. As this comment was not regarding the adequacy of the EIR, no further response is required.

VCWPD2-7 The comment states that the EIR should describe where the GSWC would derive its increase in groundwater sources, including extraction locations and the discharge location of the "Brine Line." As part of the Salinity Management Plan for the Calleguas Creek Watershed, the Calleguas Municipal Water District (Water District) is constructing the Regional Salinity Management Project, also referred to as the Brine Line extending from an outfall in Port Hueneme to Simi Valley. When the facilities for brine disposal become available, the use of groundwater could significantly increase in the Simi Valley System. The third and final phase of the project will extend the Brine Line to Simi Valley and the Simi Valley Wastewater Treatment Plant. The completion date is currently unknown. The Brine Line would allow GSWC's Simi Valley System to treat water with higher mineral content and dispose of the concentrated brine. As detailed on pages 4.17-8 and 4.17-9:

> … GSWC intends to develop plans to increase utilization of local groundwater resources for the Simi Valley System through the use of reverse osmosis. When the construction of the Brine Line is complete, GSWC will be able to process groundwater with reverse osmosis treatment and discharge the resulting brine through the Brine Line. The use of reverse osmosis will enable GSWC to treat water with high Total Dissolved Solid (TDS) concentrations without the need for blending with large quantities of imported water.

However, construction of the Brine Line is not contemplated as a proposed action of the General Plan. Before undertaking the final phase of the Brine Line Project and extending the Brine Line to Simi Valley, the Water District would be required to prepare the appropriate environmental documentation to address potential impacts, including brine discharge locations, groundwater overdraft and a decrease in surface water flows.

The EIR utilized both the VCWWD No. 8 2010 UWMP and the GSWC 2005 UWMP in order to determine whether build-out of the development contemplated under the General Plan would adversely impact potable water supply resources. The General Plan EIR is not intended to evaluate impacts associated with future construction projects that would be undertaken by agencies outside the jurisdiction of Simi Valley, such as the Brine Line proposed in the GSWC's 2005 UWMP. As such, the EIR correctly concluded that impacts to water supply and groundwater resources would be less than significant. No further response is required.

VCWPD2-8 The comment states that the EIR should describe the source of recycled water as detailed in the VCWWD's 2008 Recycled Water Master Plan Update. As stated on page 4.17-8:

> The District's 2008 Recycled Water Master Plan Update (RWMP) identifies and evaluates more than 130 potential recycled water customers with a potential demand of 9,000 afy compared to the current demand averaging 60 afy (37 gpm). Increasing the usage of this local water resource improves the reliability of the District's water supply by reducing its dependence on imported water. The RWMP concluded with a recommended project to extend the existing recycled water system southerly along Madera Road and easterly along Royal Avenue to serve 28 or more potential customers and increasing recycled water usage by as much as 1,170 afy (726 gpm). The West Simi Valley Water Recycling Project, based on the recommended project, is currently undergoing environmental analysis and documentation.

The West Simi Valley Water Recycling Project is not contemplated as project under the General Plan. Rather the EIR accurately describes the planned improvements that are currently being undertaken by the VCWWD No. 8, including the District's recycled water project as a potential source of water supply. Refer also to Response to Comment VCWPD2-7. No further response required.

VCWPD2-9 The comment states that increases in groundwater and reclaimed wastewater have not been quantified. Refer to Response to Comment VCWPD2-7 and VCWPD2-8. Potential groundwater and reclaimed water supplies were quantified based on the data available in the VCWWD No. 8 2010 UWMP and the GSWC 2005 UWMP. As previously stated, projects contemplated under the respective UWMPs are not required to be evaluated under the General Plan EIR. The EIR analyzed potential impacts associated with build-out contemplated under the General Plan, including impacts to water supply and groundwater resources. Incorporation of General Plan policies, as well as compliance with local, state, and federal regulations would ensure that impacts to such resources remain less than significant.

## Ventura County Air Pollution Control District (VCAPCD), October 24, 2011

VCAPD-1 This comment contains introductory, general information and a summary of the proposed project. No further response is required.

VCAPD-2 This comment states that the VCAPD concurs with the findings of Section 4.3 (Air Quality), including the significant and unavoidable impacts identified under Impact 4.3-4 regarding construction impacts; Impact 4.3-5 regarding conflicting with the VCAPD's Air Quality Management Plan; Impact 4.3-6 regarding operational emissions exceeding $PM_{10}$ and $PM_{2.5}$ thresholds; and Impact 4.3-7 regarding cumulative impacts for net increases in criteria pollutants. No further response is required.

VCAPD-3 This comment states that implementation of the General Plan would result in a net increase in criteria pollutants, and accurately describes the EIR's finding that such an increase would constitute a significant and unavoidable impact. As this comment was not regarding the adequacy of the EIR, no further response is required.

VCAPD-4 This comment describes the City's plan to expand the City's wastewater treatment plant, and that the wastewater treatment plant expansion would occur even if the General Plan were not implemented. As this comment was not regarding the adequacy of the EIR, no further response is required.

VCAPD-5 This comment concurs that the General Plan policies identified in Section 4.3 (Air Quality) would reduce potential pollutant emissions. The comment further states that the EIR accurately identifies mitigation measures that would further reduce impacts associated with fugitive dust, and measures for projects that are inconsistent with the Air Quality Management Plan and reducing vehicle miles traveled. As this comment was not regarding the adequacy of the EIR, no further response is required.

## Southern California Association of Governments (SCAG), August 16, 2011

SCAG-1 This comment contains introductory and general information. No further response is required.

SCAG-2 This comment summarizes the project location and describes the proposed project. As it is not a comment on the adequacy of the EIR, no further response is required.

SCAG-3 The comment states that the Draft EIR should reflect the most recently adopted SCAG forecasts contained in the 2008 RTP for population, households, and employment. The comment further confirms that page 4.13-5 of the Draft EIR indicates that the analysis was based on 2008 RTP Regional Growth Forecasts. The Draft EIR analyzed the project's consistency with all of the goals listed in this comment (see Table 4.10-7, beginning on page 4.10-55). The remainder of this comment states that the proposed project generally meets consistency with most of the identified RTP policies, and partially meets consistency with RTP G5 by encouraging TDM strategies that reduce VMT, but encourages new development that may emit pollution and reduce air quality. As noted, the project includes policies that focus on transit-oriented growth in transportation corridors and promotes mixed-use development, which serves to reduce VMT and encourage transit use. The General Plan Update contains multiple policies that support the provision of a comprehensive multi-modal and interconnected transportation system, and the use of public transit as an alternative to automobile travel. Further, policies in the plan support the concept of "complete streets" that include all modes and users of all abilities. There are policies that require enhancement of bikeway linkages and pedestrian connections between residential areas and community facilities and services to maximize the use of alternative modes of travel. The updated Mobility Element supports the concept of "complete streets," as well as identification of truck routes and freight service to move people and good in the community. The land use changes proposed in the updated plan enhances the mixed-use development options in areas accessible to transit and employment centers, thus enhancing accessibility to transit as well as jobs. As noted, the proposed project encourages development within the CURB and

prioritizes infill and redevelopment of existing developed areas through implementation of Policies LU-1.2 and LU-1.3 As development projects are proposed pursuant to the General Plan, feasible mitigation measures will be identified to further reduce emissions and increase the use of transit.

SCAG-4 With regards to consistency with SCAG Compass Growth Visioning principles, the comment states that the project generally meets consistency with Principle 1. No further response is required.

SCAG-5 The comment states that the proposed project meets consistency with Principle 2. No further response is required.

SCAG-6 The comment states that the proposed project meets consistency with Principle 3 where applicable. No further response is required.

SCAG-7 The comment states that the proposed project is partially consistent with Principle 4, although the comment goes on to state that the project is consistent with each of the identified Principles P4.1 through P4.4. It is not stated in what way the project is not fully consistent with Principle 4. General Plan policies promote sustainability, including green development and building practices; provide an overall land use pattern that promotes efficient development, reduces air pollution and greenhouse gas emissions, and diverts waste; and preserves the City's sensitive ecological areas and protects open space and recreational resources.

SCAG-8 As development is proposed under the General Plan Update, feasible mitigation measures or other conditions of approval may be required to reduce localized or regional environmental impacts, which would be the subject of a Mitigation Monitoring and Reporting Program as required by CEQA. Transportation information generated by any required monitoring program will be submitted to SCAG as such information becomes reasonably available in accordance with CEQA Guidelines Section 15097(g).

## Santa Monica Mountains Conservancy (SMMC), November 3, 2011

SMMC-1 This comment contains introductory material and is not a comment on the adequacy of the EIR. No further response is required.

SMMC-2 This comment states that the plan includes appropriate policies to protect biological resources and provide for appropriate mitigation. This comment does not address the adequacy of the EIR and no further response is required.

SMMC-3 Pursuant to implementation program NR-1, the City will amend the Development Code to provide effective open space preservation; require mitigation for the loss of habitat areas; require development agreements that maintain open space in private developments; establish and acquire conservation easements; accept donations for open space protection; and conserve undeveloped open space and drainage channels

for the purpose of protecting water resources in the City's watershed. Implementation program NR-4 requires that the City review and update the Development Code to establish requirements for new development proposals, as follows: provide effective preservation of open space areas; habitat movement corridors; and wildlife crossings.

SMMC-4 The comment requests revision of Policy NR-1.7 to require that development agreements include conservation easements in favor of a public park and open space agency. This policy does include establishment of conservation easements as one of the tools to conserve open space. The implementation programs included in the General Plan Update will protect, conserve, and maintain the open space, hillside, and canyon areas that provide a buffer zone around the City's urban form, serve as designated habitat for sensitive species, and provide recreation opportunities by establishing partnerships with other land management agencies. In addition, implementation program NR-2 requires that the City continue to ensure that all development proposals are reviewed per the requirements of CEQA to ensure that mature trees are preserved; appropriate wildlife crossings are installed; sensitive biological or wetland resources adversely affected by new development are appropriately evaluated, mitigated, and restored; and trails impacting sensitive habitats are relocated, when necessary.

SMMC-5 Policy NR-1.8 does not propose establishing a formal Transfer of Development Rights program. This comment will be forwarded to the decision-makers for their consideration prior to taking action on the project.

SMMC-6 As noted on page 4.4-34 under Impact 4.4-1, noise associated with construction and operation of proposed developments could exceed ambient levels, potentially resulting in adverse affects to special status wildlife species in the local area. Excessive operational noise could disrupt vital activities (e.g., breeding, foraging, and migration) for some wildlife species and potentially displace them from important habitats located adjacent to proposed developments. This can be expected to be an elevated threat imposed by new developments proposed within currently undeveloped land. Outdoor lighting proposed in new developments or redevelopments would also have the potential to result in a change in ambient conditions and new source of glare and/or lighting onto adjacent habitats. Artificial night lighting during construction and operation on adjacent native habitats could, therefore, disrupt essential behavioral and ecological processes of sensitive wildlife species. Direct and indirect impacts to sensitive species potentially resulting from development proposed under the General Plan Update would be addressed at the project level through the CEQA process and compliance with relevant local, state, and federal regulations protecting sensitive plant and wildlife species. This consideration will include analysis of the General Plan policies and goals LU-4.2, LU-4.4, LU-4.5, LU-6.3, NR-1.1, NR-1.2, NR-1.3, NR-1.4, NR-1.5, NR-1.6, NR-1.7, NR-1.8, NR-1.9, NR-1.10, NR-1.11, NR-2.1, NR-2.2, NR-2.3, NR-2.4, NR-2.5, NR-2.6, NR-2.7, NR-2.8, NR-3.3, NR-5.2, and N-3.1, as described on pages 4.4-30 through 4.4-34, that will mitigate potential impacts to

sensitive species by specific projects. Project-specific requirements would ensure that the appropriate biological resources technical studies are conducted, including baseline surveys, protocol surveys, tree inventories, and preconstruction surveys, in order to confirm the presence or absence of any special status species within or adjacent to proposed impact areas. Reports would be prepared that would document baseline conditions at the time of project application, identify constraints, recommend project re-design, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant. If necessary, the project applicant would be required to enter into consultations with, and obtain appropriate permits from, the USFWS, CDFG, and/or the City for unavoidable impacts to sensitive species and other protected resources that may require permits, field studies, and/or nesting studies. Project-specific requirements would also include compliance with the federal ESA, CESA, and local policies protecting sensitive species, such as the City's Municipal Code.

Please also refer to Response to Comment SMMC-4, above, with regard to protection of wildlife corridors.

SMMC-7 The language of Policy NR-2.5 does not preclude a greater ratio if required by the California Department of Fish & Game. This comment will be forwarded to the decision-makers for their consideration prior to taking action on the project.

SMMC-8 Please see Response to Comment SMMC-6, above, with regard to policies protecting wildlife linkages and mitigation measures that may be required on a project level to ensure that movement of wildlife species is not impaired.

SMMC-9 Please see Response to Comment SMMC-6, above, with regard to policies protecting wildlife linkages and mitigation measures that may be required on a project level to ensure that movement of wildlife species is not impaired.

SMMC-10 Please see Response to Comment SMMC-6, above, with regard to policies protecting wildlife linkages and mitigation measures that may be required on a project level to ensure that movement of wildlife species is not impaired. Since the specific development that would be proposed in Areas 6 and 11 is unknown at this time, it is speculative to assume that significant impacts would occur as the comment states. It is also speculative to assume that road improvements in the Alamos Canyon area would decimate wildlife mobility, as the commenter states, since the nature of any improvement is not known at this time. Compatibility of proposed land uses is addressed at a plan level in Section 4.10 (Land Use/Planning) of the EIR. CEQA requires a good faith determination of project impacts to the extent known (Guidelines Section 15151) and does not require speculative analysis. As development is proposed under the General Plan Update, project-level environmental review will be conducted to determine project-specific impacts on biological resources, including land use compatibility, of any proposed use to ensure consistency with General Plan

policies directed at conserving biological resources, protecting open space, and preserving wildlife corridors.

SMMC-11 This comment contains closing information and is not a comment on the adequacy of the EIR. No further response is required.

## County of Ventura Public Works Department (VCPWD), October 28, 2011

VCPWD-1 This comment states that liquefaction has occurred within the City and that CDMG (CGS) Special Publication 116, page 78 should be referenced. Liquefaction hazards are accurately described on page 4.6-17 and illustrated in Figure 4.6-3. No further response is required.

VCPWD-2 The comment states that the references for the County of Ventura should be updated to incorporate the 2010 California Building Code (CBC) as adopted by the County. As such the text on page 4.6-19 has been revised as follows:

> The state regulations protecting human-occupied structures from geo-seismic hazards are contained in California Code of Regulations (CCR) Title 24, Part 2 (the California Building Code [CBC]). These regulations apply to public buildings and a large percentage of private buildings in the state. Until January 1, 2008, the CBC was based on the then-current UBC and contained Additions, Amendments and Repeals specific to building conditions and structural requirements in the State of California. The ~~2007~~2010 CBC, effective January 1, ~~2008~~2011, is based on the current (~~2006~~2009) International Building Code and contains prominent enhancement of the sections dealing with fire safety, equal access for disabled persons, and environmentally friendly construction. Seismic-resistant construction design is required to meet more stringent technical standards than those set by previous versions of the CBC.
>
> Chapter~~s~~ 16 ~~and 16A~~ of the ~~2007~~2010 CBC deal with Structural Design requirements governing seismically resistant construction (Section 1604), including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design (Sections ~~1613 and 1613A~~1613.5 through 1613.7). Chapter~~s~~ 18 ~~and 18A~~ of the ~~2007~~2010 CBC include (but are not limited to) the requirements for foundation and soil investigations (Sections ~~1802 and 1802A~~ 1803); excavation, grading, and fill (Sections ~~1803 & 1803A~~ 1804); allowable load-bearing values of soils (Sections ~~1804 and 1804A~~ 1806); and the design of footings, foundations, and slope clearances (Sections ~~1805 & 1805A~~ 1808 and 1809), retaining walls (Sections ~~1806 and 1806A~~ 1807), and pier, pile, driven, and cast-in-place foundation support systems (Sections ~~1808, 1808A, 1809, 1809A,~~ 1810 ~~and 1810A~~). Chapter 33 of the ~~2007~~2011 CBC includes (but is not limited to) requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304). Appendix J of the ~~2007~~2010 CBC contains grading specifications for permits, inspections, excavations, fills, setbacks, drainage and terracing, and erosion control (Sections J106, J107, J109 and J110).
>
> Cities and counties are required to enforce the regulations of the ~~2007~~2011 CBC beginning January ~~1, 2008~~2, 2010. The City of Simi Valley adopted the 2010

> California Building Code, Volumes 1 and 2, on January 13, 2011 (Ordinance No. 1167).

Also in response to this comment, the following text on page 4.6-20 has been revised as follows:

> Development within unincorporated hillside management areas in the County, including those within the planning area, is regulated by the Ventura County Building Code, and Chapters 6 and 7 of the Ventura County Land Development Manual Division. All building, grading, and excavation must comply with Appendix ~~33~~J of the Ventura County Building Code. Chapter 18 of the Ventura County Building Code also provides development standards associated with expansive soils (Ventura County ~~2002~~2011).

Additionally, the following text to the second paragraph on page 4.6-27 has been revised as follows:

> All demolition and construction activities within the City are presently required to comply with CBC ~~Chapter 70~~ Appendix Section J110, Erosion Control standards, which are designed to ensure implementation of appropriate measures during grading and construction to control erosion and storm water pollution. …

This comment has been addressed and no further response is required.

VCPWD-3 The comment states that the Thresholds language is outdated for earthquake fault zones and should be updated. However, as stated on page 4.6-22, "The following thresholds of significance are based on Appendix G of the 2011 CEQA Guidelines." As such, the thresholds regarding earthquake fault zones are in accordance with the 2011 CEQA Guidelines.

VCPWD-4 The comment states that the reference to Chapter 33 of the California Building code is incorrect. The following revision to the second paragraph of page 4.6-24 has been made in response to this comment:

> As noted in Section 4.6.1, there are several fault zones within and near the City that have the potential to produce moderate to large earthquakes and corresponding groundshaking within the City limits. However, new land uses permitted under the General Plan Update would be required to comply with the building design standards of the CBC ~~Chapter 33~~ (as adopted by the City pursuant to Section 8-11.01 of the Simi Valley Municipal Code) and would be required to incorporate structural features, foundation modifications, and improved materials and construction methods that reflect current and future updated seismic and geologic safety standards intended to mitigate adverse seismic impacts upon structures.

VCPWD-5 The comment states that Impact 4.6-6 should remove references to Table 18-1-B. Refer to Response to Comment VCPWD-2. The thresholds of significance and impact statements were developed based on the 2011 CEQA Guidelines Appendix G. Refer to Response to Comment VCPWD-2 for a description of text changes provided to ensure the EIR incorporates the appropriate 2010 CBC Building Code references.

## Ventura Local Agency Formation Commission (VLAFC), March 12, 2012

VLAFC-1 This comment contains introductory material and this is not a comment on the adequacy of the Draft EIR. No further response is required.

VLAFC-2 The comment states that the General Plan Update would require the Ventura Local Agency Formation Commission to require annexation and sphere of influence amendments. The comment further states that the General Plan Update land use map designated a substantial amount of unincorporated territory located outside City boundaries for urban development. Additionally, the comment states that developments in the areas outside of the City boundaries were not properly included in the EIR analysis, and identifies areas outside the City's boundaries that are of concern. The comments request explanation about potential impacts from expansion into the SOI due to water supply shortages, as identified in the VCWWD No. 8 2010 Urban Water Management Plan (UWMP). Based on review of the EIR and the UWMP, it has been determined that sufficient supplies from Calleguas Municipal Water District (CMWD) and other water resources exist to serve the additional developments without impact.

The General Plan Update land use map identified in the comment is located on page 3-9 as Figure 3-3 (General Plan Land Use Map) of the Draft EIR. This figure is based upon existing General Plan (as amended through 2005) land use designations. Refer also to Figure 4.10-3 (1988 General Plan Land Use Map) on page 4.10-21 of the Draft EIR, which clearly shows that the areas identified in the comment would not represent any change in existing land use designation that would be contemplated under the General Plan Update. The identified areas have been previously contemplated for potential annexation and development in the existing (1988) General Plan (as amended through 2005), but to date, no action has occurred with respect to these areas.

Further, on page 3-21 of the Draft EIR, Figure 3-4 (Areas of Potential Land Use Change) depicts the potential land use changes that would result from the implementation of the proposed General Plan Update. There is no urban development that would occur outside the City boundary except for a very small portion of the Parker Ranch Expansion Area. The Parker Ranch Expansion Area is located within the sphere of influence area as designated by the Local Agency Formation Commission in 1988. Refer to Draft EIR pages 3-7 to 3-8 for the definition and discussion of City Urban Restriction Boundary (CURB) line, Sphere of Influence (SOI), and area of interest lines.

As discussed in the Draft EIR on page 3-24, approximately 11.1 acres of the Ranch Expansion Area would be redesignated from their current General Plan designation of Residential Very Low (0–3 dwelling units per acre [du/ac])to Residential Medium

(3.6 to 5.0 du/ac). The change would be consistent with the adjacent land uses within the Parker Ranch community.

Further, and as stated on page 4.10-63 in Section 4.10 (Land Use/Planning) of the Draft EIR, "However, as the General Plan Update does not propose changes to any unincorporated lands in Ventura County, the proposed project would not be inconsistent with the policies and programs in the County General Plan."

While Figure 3-3 of the Draft EIR and Figure 3-7 of the General Plan Update show that areas outside the City's boundaries are designated for future development, these areas were previously considered for such development and are not part of the land use changes proposed under the General Plan Update. Further, if such development and the associated annexation were to occur, the individual projects would be required to undergo their own individual environmental review, consistent with CEQA and all applicable regional and local regulations, including, but not limited to the LAFCO Guidelines for Orderly Development and the County of Ventura General Plan. However, to address the commenter's concerns, City staff has prepared a supplemental analysis of water demand in areas outside City limits.

There are 2,866 acres of land within the City's SOI outside the current VCWWD No. 8 service area. The year 2035 water demand for these developments would be 3,084 acre-feet per year (afy). The water demands for these areas are tabulated in Table 1 (Supplemental Water Demand Analysis).

**Table 1 Supplemental Water Demand Analysis**

| *Additional Areas for Water Services* | *Acres* | *Duty (in gpd/ac)* | *Demand (in afy)* |
|---|---|---|---|
| Waste Management (self-contained) | | | |
| Landfill | 248 | 0 | 0 |
| Industrial | 711 | 2,880 | 2,292 |
| Cemetery | 233 | 1,584 | 413 |
| Open Space | 1,184 | 0 | 0 |
| Residential Medium | 49 | 2,016 | 111 |
| Residential Moderate | 11 | 2,016 | 25 |
| Area A (Marr Ranch) | | | |
| Open Space | 58 | 0 | 0 |
| Area B (RSRPD) | | | |
| Open Space | 7 | 0 | 0 |
| Area C (County Flood Control/RSRPD) | | | |
| Open Space | 160 | 0 | 0 |

| **Table 1 Supplemental Water Demand Analysis** | | | |
|---|---|---|---|
| ***Additional Areas for Water Services*** | ***Acres*** | ***Duty (in gpd/ac)*** | ***Demand (in afy)*** |
| Area D (Vintage Petroleum) | | | |
| Residential Medium | 17 | 2,016 | 38 |
| Residential Low | 18 | 2,016 | 41 |
| Open Space | 12 | 0 | 0 |
| Area E (Parker Ranch) | | | |
| Residential Medium | 4 | 2,016 | 9 |
| American Jewish University | | | |
| University (Residential Medium) | 69 | 2,016 | 155 |
| Bard Reservoir | | | |
| Open Space | 86 | | 0 |
| Santa Susana Knolls | | | |
| RE 5-AC | 5 | 2,016 | 12 |
| RE 1-AC | 4 | 2,016 | 8 |
| RE 30 | 1 | 2,016 | 3 |
| RE 20 | 15 | 2,016 | 33 |
| RHD 20 | 2 | 2,016 | 5 |
| Demand Difference (Table II-4 & III-5a) | | | 96 |
| *Total* | *2,893* | | *3,241* |

The potential growth of the Santa Susana Knolls area, amounting to an additional 61 afy was not taken into account by the UWMP. The growth in the unincorporated area, commonly referred to as the Santa Susana Knolls, is served by VCWWD No. 8 and is not included in the SOI additions are shown in Table 1. The UWMP identified total resources of 29,285 afy while projecting demands of 29,381 afy in 2035. This shortfall of supply of 96 afy is included in Table 1.

The Calleguas 2010 UWMP indicates that the supplier, the Metropolitan Water District of Southern California, provided conservative projections regarding its water supply availability to the Year 2035. Calleguas Municipal Water District (Calleguas) Calleguas anticipates that, surplus supply conditions of 12 percent, eight percent and five percent, respectively, will occur in 2035. Calleguas' estimated imported water supply surplus in 2035 ranges from 6,917 af (multiple dry years) to 15,672 af (normal year). As such, sufficient imported water from Calleguas is projected to be available to meet the City's revised demand forecast, which calls for an additional 3,241 af of imported water.[16]

[16] Letter from Susan B. Mulligan, General Manager, Calleguas Municipal Water District, May 22, 2012.

The UWMP does not seek to identify the maximum available supplies that may be available. The process that is used for imported water dependent purveyors, including VCWWD No. 8 is that the projected imported water demands are requested from CMWD and CMWD responds whether the supplies are available to meet projected demands, or not. In the case of the UWMP, CMWD responded that the requests for demands from VCWWD No. 8 under the 25-year planning horizon of 2010 to 2035 could be met, and the UWMP then documents that projected demands and projected supplies are equivalent. This does not, as the comments suggest, prove that additional supplies are therefore not available. Additional supplies are available, but additional review needs to be conducted to assure that the entire supply is not obligated at the time additional demands are projected and analyzed. A comprehensive review of all resources and projected demands also occurs every 5 years under current state law, and an update to the UWMP in 2015 is anticipated.

VLAFC-3 The comment states that Section 7.17.2 [sic] [Section 4.17.2] of the Draft EIR is derived from demand estimates contained in the Ventura County Waterworks District No. 8 2010 Urban Management Plan (UWMP). The comment states that the UWMP only included water demand analysis for the anticipated future development within the City boundaries and within current District boundaries and does not consider the anticipated urban development outside the City boundaries resulting from the General Plan Update. The comment requests that the Draft EIR be revised to address the water supply and demand for the urban development outside the City boundary.

As discussed under comment response VLAFC-2, as depicted in Figure 3-4 (Areas of Potential Land Use Change) on page 3-21 of the Draft EIR, the General Plan Update does not consider any previously unidentified urban development that would occur outside the City boundary except for a very small portion of the Parker Ranch Expansion Area that is located within the SOI area as designated by the Local Agency Formation Commission in 1988.

Potential impacts related to future water demand are described in detail on pages 4.17-19 through 4.17-21 of the Draft EIR. Specifically, as stated on page 4.17-21:

> The VCWWD No. 8 2010 UWMP identifies the average day demand for potable water in the City of Simi Valley based on land use type. As shown in Table 4.17-5 ((District's Water Demand Associated with General Plan Update Build-Out), build-out of the GPU would result in a 2,826,155 gpd, or 3,167 afy, increase in water demand over existing demand. It should be noted that all future demands are expected from proposed development located within current City boundaries. According to the County of Ventura General Plan, new development within the unincorporated areas of the District is not expected to include any significant development before Year 2035. The District's 2010 UWMP projected a total demand of 33,625 afy in 2035, while ultimate build out of the General Plan would result in a demand of 28,728 afy in the District's service area within the City. Therefore, the ultimate General Plan build out demand are within the total District ultimate estimated capacity.

Therefore, the UWMP and Section 4.17 (Utilities/Services Systems) of the Draft EIR adequately address the water supply and demand for all the land uses resulting from full implementation of the General Plan Update. However, to address the commenter's concerns, City staff prepared a supplemental analysis of water demand in areas outside City limits. Please see Response to Comment VLAFC-2.

VLAFC-4 Comment VLAFC-4 is related to the City's Water Quality Control Plant (WQCP) and presented that the expansion into the SOI may have impacts related to the City exceeding the rated WQCP treatment capacity of 12.5 million gallons per day (mgd). The comment states that the wastewater analysis provided in the Draft EIR does not consider the anticipated urban development outside the City boundaries resulting from the General Plan Update. The comment requests that the Draft EIR be revised to address wastewater issues for urban development outside the City boundary.

Based on review of the EIR and the *City of Simi Valley Sewer System Evaluation and Capacity Assurance Plan* (Assurance Plan), prepared in August 2010, it has been determined that there exists sufficient capacity within the 12.5 mgd-rated WQCP capacity for future developments allowed under the General Plan, including developments within the SOI.

The Assurance Plan calculated the existing average dry weather sewage flow (DWF), presented in Table ES-4 and Table 4.1. The existing DWF is 7.7 mgd. EIR Table 4.17-6 Projected Change in Flow at General Plan Build-Out calculates additional flows due to developments within the City Limit, of 2.8 mgd. Summing these DWFs, the projected future flow from build-out within the City limits is 10.5 mgd.

Table 2 (Supplemental Wastewater Analysis) shows the potential SOI flows to be added to consider all potential build-out DWFs. The sum of the DWFs from build-out within the SOI, outside the City Limit, is 1.7 mgd. The revised sum of all City build-out, within the City and the City SOI, including all areas currently served by the sewer system (including areas outside the City Limit, such as the Santa Susanna Knolls community) is the sum of 10.5 mgd and 1.7 mgd or 12.2 mgd. This projection remains within the 12.5 mgd-rated WQCP capacity, therefore, no impact for sewage treatment are analyzed.

| Table 2 Supplemental Wastewater Analysis | | | | | |
|---|---|---|---|---|---|
| ***SOI Build-Out Areas*** | ***Acres*** | ***DUs*** | ***CFS*** | ***DWF in GPD*** | ***DWF in GPD*** |
| Waste Management (self-contained) | | | | | |
| Landfill (.0003 cfs/acre) | 248.00 | | 0.0744 | 48083.00 | |
| Industrial (.32 FAR) (.008 cfs/acre) | 711.00 | | 1.8202 | 1176344.00 | |
| Cemetery (.0003 cfs/acre) | 233.00 | | 0.0699 | 45174.00 | |
| Open Space (1 du/ 40 acre) | 1184.00 | 29.60 | | 8140.00 | |
| Residential Medium (3.6 - 5.0 du/ac) | 49.00 | 245.00 | | 67375.00 | |
| Residential Moderate (5.1 - 10 du/ac) | 10.90 | 109.00 | | 29975.00 | 1,375,091 |
| Area A (Marr Ranch) | | | | | |
| Open Space (1 du/ 40 acre) | 57.60 | 1.44 | | 396.00 | 396 |
| Area B (RSRPD) | | | | | |
| Open Space (1 du/ 40 acre) | 6.80 | 0.17 | | 46.75 | 47 |
| Area C (County Flood Control/RSRPD) | | | | | |
| Open Space (1 du/ 40 acre) | 159.60 | 3.99 | | 1097.25 | 1,097 |
| Area D (Vintage Petroleum) | | | | | |
| Residential Medium (3.6 - 5.0 du/ac) | 17.00 | 85.00 | | 23375.00 | |
| Residential Low (2.1 - 3.5 du/ac) | 18.20 | 63.70 | | 17517.50 | |
| Open Space (1 du/ 40 acre) | 12.40 | 0.31 | | 85.25 | 40,978 |
| Area E (Parker Ranch) | | | | | |
| Residential Medium (3.6 - 5.0 du/ac) | 4.00 | 20.00 | | 5500.00 | 5,500 |
| American Jewish University | | | | | |
| University (.371 cfs/University) | 68.90 | | 0.371 | 239767.00 | 239,767 |
| Bard Reservoir | | | | | |
| Open Space (1 du/ 40 acre) | 86.00 | 2.15 | | 591.25 | 591 |
| *Total* | | | | | *1,663,467* |

Furthermore, the EIR for the Simi Valley Landfill and Recycling Center Expansion Project dated September 2009 concluded that an on-site package wastewater treatment plant would be used for future land development of those parcels. The DWFs from the "Waste Management" area within the SOI total nearly 1.4 mgd, and the remaining flows from SOI developments are 0.3 mgd. If this were added to the City limits build-out, the ultimate DWF would be 10.8 mgd, also with no impact to the WQCP rated DWF capacity of 12.5 mgd.

VLAFC-5 The comment contains closing information and this is not a comment on the adequacy of the Draft EIR. No further response is required.

## Ventura Local Agency Formation Commission (VLAFC2), April 11, 2012

VLAFC2-1 The comment contains introductory information that is addressed in detail in subsequent comments. Please see Response to Comment VLAFC2-2 through VLAFC2-10.

VLAFC2-2 The comment points out apparent discrepancies between the water service area map (Figure 4.17-1) and the map on file with VLAFCo and provides what is stated to be the correct graphic. While there are minor differences in the maps as included in the EIR and as provided by the commenter, these discrepancies do not affect the significance conclusion reached in the EIR and it is not necessary to revise the EIR or Water Supply Assessment (WSA) graphics. It is outside the purview of the General Plan Update process to amend exhibits that are contained in the District's 2010 Urban Water Management Plan, which is subject to oversight by the Ventura County Waterworks District No. 8. Minor corrections to graphics in the General Plan and the UWMP may be made at the time of the next update.

VLAFC2-3 The comment states that the WSA does not evaluate the water supply and demand for areas outside the City that are served by the District and cannot be relied upon to determine whether VCWWD No. 8 will have an adequate water supply to meet the additional demands of the City's General Plan Update. As noted in Response to Comment VLAFC-2, no previously unidentified urban development would occur outside the City boundary as a result of implementation of the General Plan Update with the exception of a very small portion of the Parker Ranch Expansion Area, which is located within the sphere of influence area as designated by VLAFCo in 1988. As noted in Response to Comment VLAFC-2, potential impacts related to future water demand are described in detail on pages 4.17-19 through 4.17-21 of the Draft EIR. The District is not the only provider of water for the City; Golden State Water services a portion of the City, and the estimates in the WSA and the EIR for water supply and demand take into account <u>both sources</u> of domestic water. The District's 2010 UWMP projected a total demand of 33,265 afy in 2035 (including areas outside City limits; see Response to Comment VLAFC-2) and ultimate build-out of the General Plan would result in a demand of 28,728 afy in the District's service area within the City. The District provided 25,321 af (64%) in 2010, while GSWC supplied 9,458 af (36%) to the City in 2010. Thus, the GSWC supplied 36 percent of the City's water, while the District supplied the remainder, also providing water to some unincorporated areas of the County outside the District. Based on the combined sources, the WSA and the EIR accurately accounted for supply and demand through 2035, and the conclusion that demand would not exceed supply remains correct. The EIR properly relied on the adopted 2010 UWMP for its analysis of water supply and demand. See Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-4 The WSA was prepared prior to the adoption of the 2010 UWMP and relied on the 2005 UWMP for its analysis. While the WSA was used to support the analysis in the EIR, the EIR analysis was updated based on the later information contained in the 2010 UWMP. This does not render the WSA invalid. Regardless of whether the 2005 UWMP or the 2010 UWMP data are used, the conclusion remains the same. There would be adequate supply of water to meet the demand of development under the General Plan Update. The data were updated in the EIR at the request of the District, but it was not necessary to update the WSA, as the conclusions remained the same.

VLAFC2-5 See Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-6 As noted, while Figure 3-3 of the Draft EIR and Figure 3-7 of the General Plan Update show that areas outside the City's boundaries are designated for future development, these areas were previously considered for such development and are not part of the land use changes proposed under the General Plan Update. If development in these areas were to occur, individual projects would be required to undergo individual environmental review to determine the adequacy of utility infrastructure to serve the individual projects. However, see Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-7 This comment addresses purported inaccuracy of the UWMP and states it does not accurately account for projected demand within the District. The EIR properly relied on the adopted 2010 UWMP for the analysis. However, see Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-8 Please see Response to Comment VLAFC2-7. The EIR analysis properly relied on the adopted 2010 UWMP for its analysis. However, see Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-9 This comment does not pertain to the adequacy of the EIR and the analysis contained therein, no further response is required. However, see Response to Comment VLAFC-2 for the supplemental water demand analysis for areas outside City limits.

VLAFC2-10 The apparent discrepancies in the sewer map provided by LAFCo with the comment letter are not significant and do not change the significance conclusions in the EIR. Future sewer demand was calculated for all development, including reasonably foreseeable cumulative development, which would occur within the service area of the Simi Valley County Sanitation District. However, see Response to Comment VLAFC-4 for the supplemental wastewater analysis for areas outside City limits.

[This page is intentionally left blank.]