

# CHAPTER 9 Response to Comments

## 9.1 ORGANIZATION OF THE RESPONSES TO COMMENTS

In total, eleven comment letters regarding the Draft EIR were received from four state departments, and seven regional agencies. Table 9-1 (Comment Letters Received) provides a comprehensive list of commenters in the order that they are presented in this section.

<b>Table 9-1 Comment Letters Received</b>				
<b>No.</b>	<b>Commenter/Organization</b>	<b>Abbreviation</b>	<b>Page Where Comment Begins</b>	<b>Page Where Response Begins</b>
<b>STATE DEPARTMENTS</b>				
1	California Department of Fish and Game, October 20, 20112	CDFG	9-3	9-38
2	Office of Planning and Research, October 27, 2011	OPR	9-4	9-38
3	Native American Heritage Commission, October 27, 2011	NAHC	9-7	9-38
4	California Department of Transportation, November 3, 2011	Caltrans	9-8	9-40
<b>REGIONAL AGENCIES</b>				
5	County of Ventura, Planning Division, October 24, 2011	CoV	9-10	9-41
6	Ventura County Watershed Protection District (Planning and Regulatory Division), October 24, 2011	VCWPD1	9-12	9-41
7	Ventura County Watershed Protection District (Groundwater Section), October 24, 2011	VCWPD2	9-15	9-44
8	Ventura County Air Pollution Control District, October 24, 2011	VCAPCD	9-17	9-47
9	Southern California Association of Governments (SCAG), October 25, 2011	SCAG	9-19	9-48
10	Santa Monica Mountains Conservancy (SMMC), November 3, 2011	SMMC	9-26	9-49
11	County of Ventura Public Works Department, October 28, 2011	VCPWD	9-29	9-52
12	Ventura Local Agency Formation Commission, March 12, 2012	VLAFC	9-30	9-54
13	Ventura Local Agency Formation Commission, April 11, 2012	VLAFC2	9-33	9-60

This chapter of the Final EIR contains all comments received on the Draft EIR during the public review period, as well as the Lead Agency's responses to these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues. Therefore, the comment has been noted, but no response has been provided. Generally, the responses to comments provide explanation or amplification of information contained in the Draft EIR.

## 9.2 COMMENTS ON THE DRAFT EIR

This section contains the original comment letters, which have been bracketed to isolate the individual comments, followed by a section with the responses to the comments within the letter. As noted above, and stated in CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review will be forwarded for consideration to the decision makers as part of the project approval process. In some cases, a response may refer the reader to a previous response, if that previous response substantively addressed the same issue(s).

## 9.2.1 State Departments

### ■ California Department of Fish and Game (CDFG), October 20, 2011

Page 1 of 1  
**CDFG**

**From:** Lauren Funaiole [LFUNAIOL@simivalley.org]

**Sent:** Thursday, October 20, 2011 11:30 AM

**To:** Thomas, Ruta K; Tony Stewart

**Subject:** Fwd: Simi Valley General Plan Update DEIR SCH 2009121004

>>> Daniel Blankenship <[DSBlankenship@dfg.ca.gov](mailto:DSBlankenship@dfg.ca.gov)> 10/20/2011 11:24 AM >>>  
Dear Ms. Funaiole,

That you for the opportunity to review the NOP and DEIR for the Simi Valley General Plan Update. The Department concurs with your acknowledgment of potential biological impacts. The Department also acknowledges the importance of the protections provided by the implementation of the City's General Plan policies as well as compliance with relevant local, state, and federal regulations to reduce potential biological impacts to less than significant levels. The Department looks forward to continued coordination on future projects to facilitate the critical task of conserving and minimizing impacts to biological resources within the City's sphere of influence. Please continue to coordinate with Dan Blankenship during early project concept development, as needed, to facilitate project level biological resource evaluations.



CDFG-1

Daniel S. Blankenship  
Staff Environmental Scientist  
CA Department of Fish and Game  
P.O. Box 221480  
Newhall, CA 91322-1480  
phone/fax (661) 259-3750  
cell (661)644-8469  
[dsblankenship@dfg.ca.gov](mailto:dsblankenship@dfg.ca.gov)

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



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit

RECEIVED  
CITY OF SIMI VALLEY  
OCT 27 AM 10:50  
ENVIRONMENTAL SERVICES  
DEPARTMENT



Ken Alex  
Director

OPR

October 25, 2011

Lauren Funaiole  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, CA 93063

Subject: Simi Valley General Plan Update (GPA-0075)  
SCH#: 2009121004

Dear Lauren Funaiole:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 24, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

OPR-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2009121004  
**Project Title** Simi Valley General Plan Update (GPA-0075)  
**Lead Agency** Simi Valley, City of

**Type** EIR Draft EIR

**Description** The project consists of a comprehensive update of the Simi Valley General Plan. The updated General Plan will establish an overall development capacity for the Planning Area and will serve as a policy guide for determining the appropriate physical development and character of the City through the year 2030. The project's Planning Area comprises all properties physical development and character of the City through the year 2030. The project's Planning Area comprises all properties located within the City of Simi Valley City limits and Sphere of Influence. Buildout of the Planning Area would result in a maximum of 58,438 residential units, 7,642,000 s.f. of office space, 8,764,000 s.f. of commercial space, 12,134,000 s.f. of industrial space, and 5,743,000 s.f. of business park space.

**Lead Agency Contact**

**Name** Lauren Funaiole  
**Agency** City of Simi Valley  
**Phone** (805) 583-6772 **Fax**  
**email**  
**Address** 2929 Tapo Canyon Road  
**City** Simi Valley **State** CA **Zip** 93063

**Project Location**

**County** Ventura  
**City** Simi Valley  
**Region**  
**Lat / Long**  
**Cross Streets**  
**Parcel No.** All parcels within city limits & sphere  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** Hwy 118  
**Airports**  
**Railways** Southern Pacific  
**Waterways** Arroyo Simi  
**Schools** Simi Valley USD  
**Land Use** Residential, commercial, industrial, institutional, and open space uses within the Simi Valley City Limits and sphere of influence.

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Management Agency, California; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; Santa Monica Mountains Conservancy

Note: Blanks in data fields result from insufficient information provided by lead agency.

OPR-2

Document Details Report  
State Clearinghouse Data Base

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*Date Received* 09/09/2011    *Start of Review* 09/09/2011    *End of Review* 10/24/2011

↑ OPR-2  
↓ Cont.

Note: Blanks in data fields result from insufficient information provided by lead agency.

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

<p><b>STATE OF CALIFORNIA</b></p> <p><b>NATIVE AMERICAN HERITAGE COMMISSION</b>          915 CAPITOL MALL, ROOM 364          SACRAMENTO, CA 95814          (916) 653-4082          (916) 657-5390 - Fax</p>	<p>Edmund G. Brown Jr., Governor</p> <p><b>NAHC</b></p> 
<p>Lauren Funaiole          City of Simi Valley          2929 Tapo Canyon Rd.          Simi Valley, CA 93063</p>	<p>September 16, 2011</p> <p style="font-size: 1.2em; font-weight: bold;">RECEIVED</p> <p style="font-size: 1.2em; font-weight: bold;">SEP 19 2011</p> <p style="font-size: 1.2em; font-weight: bold;">STATE CLEARING HOUSE</p> <p style="font-size: 1.2em; font-weight: bold; color: blue;">clear 10/24/11 p</p>
<p>RE: SCH# 2009121004 Simi Valley General Plan Update (GPA-0075): Ventura County.</p> <p>Dear Ms. Funaiole:</p> <p>The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:</p> <ul style="list-style-type: none"> <li>✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:             <ul style="list-style-type: none"> <li>▪ If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.</li> <li>▪ If any known cultural resources have already been recorded on or adjacent to the APE.</li> <li>▪ If the probability is low, moderate, or high that cultural resources are located in the APE.</li> <li>▪ If a survey is required to determine whether previously unrecorded cultural resources are present.</li> </ul> </li> <li>✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.             <ul style="list-style-type: none"> <li>▪ The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.</li> <li>▪ The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.</li> </ul> </li> <li>✓ Contact the Native American Heritage Commission for:             <ul style="list-style-type: none"> <li>▪ A Sacred Lands File Check. <b>USGS 7.5 minute quadrangle name, township, range and section required.</b></li> <li>▪ A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. <b>Native American Contacts List attached.</b></li> </ul> </li> <li>✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.             <ul style="list-style-type: none"> <li>▪ Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.</li> <li>▪ Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.</li> <li>▪ Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.</li> </ul> </li> </ul>	
<p>Sincerely,</p> <p>Katy Sanchez          Program Analyst          (916) 653-4040</p>	
<p>cc: State Clearinghouse</p>	

NAHC-1

NAHC-2

# California Department of Transportation (Caltrans), November 3, 2011

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN, JR., Governor

## DEPARTMENT OF TRANSPORTATION

DISTRICT 7  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012-3606  
PHONE (213) 897-0362  
FAX (213) 897-0360  
TTY (213) 897-4937

RECEIVED  
CITY OF SIMI VALLEY  
11 NOV -3 AM 11:36  
ENVIRONMENTAL SERVICES  
DEPARTMENT



Flex your power!  
Be energy efficient!

# Caltrans

October 27, 2011

Ms. Lauren Funaiole  
Planning Department  
City of Simi Valley  
2929 Tapo Canyon Rd.  
Simi Valley, CA. 93063

RE: IGR/CEQA# 110907/NY  
DEIR/ General Plan Update  
SCH#2009121004  
Vic. VEN/118

Dear Ms. Funaiole:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed City of Simi Valley General Plan update. After review of the Draft Environmental Impact Report, Caltrans' has the following comments.

Caltrans-1

### Community Planning:

In promoting Context Sensitive Solutions, Caltrans works with local jurisdictions to incorporate community values in highway design including planning for main streets. Additionally, through planning for Completes Streets, Caltrans seeks opportunities to improve safety, access and mobility for all users including bicyclists, pedestrians, transit users, the disabled, children, and the elderly.

Caltrans-2

In an effort to promote partnerships with local jurisdictions, Caltrans offers financial assistance through the Community Based Transportation Planning Grant Program (CBTP). Caltrans recommends that the City consider this funding source when developing projects that will promote the implementation of active transportation for healthy communities and maximize the use of pedestrian facilities. Caltrans offers funding assistance to local jurisdictions that are interested. For more information on CBTP grants, please refer to the following website: [http://www.dot.ca.gov/hq/tpp/EJ\\_CBTP\\_Handbook\\_FY\\_2011\\_12.pdf](http://www.dot.ca.gov/hq/tpp/EJ_CBTP_Handbook_FY_2011_12.pdf)

### Bicycle & Pedestrian Comments:

- 1) Volume 1: '21\_Sec4-16\_Transportation-Traffic.pdf' document: Page 4.16-12 -'Existing Volumes and (LOS)' section. Are there any counts for pedestrians and/or bicyclists?
- 2) Volume 1: '21\_Sec4-16\_Transportation-Traffic.pdf' document: Page 4.16-30 -'Bikeways' section. 'Sidewalk Paths' are not intended for bicyclist. Please make every accommodation to separate pedestrians and bicyclists.
- 3) All designing details must follow standards as specified in the Highway Design Manual (HDM) and the CA MUTCD.

Caltrans-3

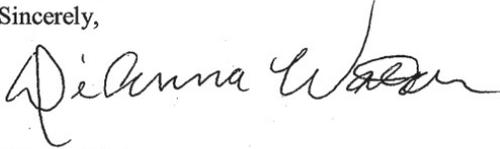
*"Caltrans improves mobility across California"*

Ms. Lauren Funaiolo  
October 27, 2011  
Page 2 of 2

It is suggested that the City consider incorporating an analysis of safe routes to school and applicable transportation safety measures and accommodations for transportation related accessibility features for the disabled in the plan. These features should include, but are not limited to sidewalks, curb ramps, audible pedestrian signals, etc.

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Nerses Armand Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 110907/NY.

Sincerely,



DiAnna Watson  
IGR/CEQA Branch Chief  
Regional Transportation Planning Office  
Caltrans, District 7

↑  
Caltrans-3  
Cont.  
■  
■  
Caltrans-4  
■

*"Caltrans improves mobility across California"*

## 9.2.2 Regional Agencies

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

Page 1 of 1

CoV

**From:** Lauren Funaiole [LFUNAIOL@simivalley.org]  
**Sent:** Monday, October 24, 2011 11:51 AM  
**To:** Thomas, Ruta K; Tony Stewart  
**Subject:** Fwd: Comments on the Draft EIR for the Simi Valley General Plan Update  
**Attachments:** 09-055-1 (APCD-AS).pdf; 09-055-1 (WPD-RV).pdf; 09-055-1 (WPD-TW).pdf; 09-055-1 City of Simi Valley Response Cover Letter.pdf

>>> "Laura Hocking" <[Laura.Hocking@ventura.org](mailto:Laura.Hocking@ventura.org)> 10/24/2011 11:41 AM >>>  
Ms. Funaiole:

Please find attached a cover letter and comments from County of Ventura staff regarding the subject document.

Thank you for allowing us to be part of the review process for this project. If you have any questions, please contact me at (805) 654-2443.

\*Please note for future reference: In the past our office has requested multiple copies of documents for our distribution. For projects distributed via CD-ROM and for "simple" documents (those without spiral binding/large, fold-out maps, etc.), a single copy of the document/CD is now usually sufficient. Please contact me with any questions regarding this request. Thank you.

Sincerely,

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

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CoV-1

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RESOURCE MANAGEMENT AGENCY

# county of ventura

Planning Division

Kimberly L. Prillhart  
Director

October 24, 2011

City of Simi Valley  
Attn.: Lauren Funaiole  
2929 Tapo Canyon Rd.  
Simi Valley, CA 93063-2100

E-mail: [lfunaiol@simivalley.org](mailto:lfunaiol@simivalley.org)

Subject: Comments on the Draft EIR for the Simi Valley General Plan Update

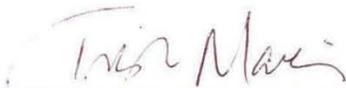
Dear Ms. Funaiole:

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

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

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

Sincerely,



Tricia Maier, Manager  
Planning Programs Section

Attachment

County RMA Reference Number 09-055-1



800 South Victoria Avenue, L# 1740, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509

Printed on Recycled Paper



CoV-2

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

VCWPD1



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
 PLANNING AND REGULATORY DIVISION  
 800 South Victoria Avenue, Ventura, California 93009  
 Tom Wolfington, Permit Manager – (805) 654-2061

### MEMORANDUM

DATE: October 21, 2011  
 TO: Laura Hocking, RMA/Planning Technician  
 FROM: Tom Wolfington, P.E. – Permit Manager *JW*  
 SUBJECT: RMA 09-055-1, DEIR Simi Valley General Plan Update  
 Various Red Line Channels, Zone 3

Pursuant to your request, this office has reviewed the subject Draft Environmental Impact Report.

#### PROJECT DESCRIPTION

The City of Simi Valley is largely urbanized with limited vacant land area. The updated General Plan focuses on how limited population and employment changes and emphasis on trip reduction strategies can be strategically managed to preserve the distinguishing and valued qualities of the City, support a thriving economy that benefits the City's residents quality of life, and to achieve a sustainable and integrated system of land use and transportation in the City of Simi Valley consistent with the requirements of recent state legislation. Of primary importance, the General Plan Update conserves the existing pattern of uses and establishes policies for the protection and long-term conservation of established residential neighborhoods. The majority of land use changes that would be allowed under the General Plan Update would be focused in areas around nodes along primary commercial and transit corridors in the City.

The Planning Area comprises all properties located within the following boundaries: the City limits of Simi Valley (approximately 27,056 acres [excluding nine unincorporated County areas within the City boundaries]); the Simi Valley City Urban Restriction Boundary (CURB) (3,039 acres beyond the City limits); and the City's Sphere of Influence (SOI) (4,001 acres abutting the City limits); and the Simi Valley Area of Interest (total of 32,230 acres). The General Plan Update contains policies regarding future land use and development addressed from a Citywide perspective, with the majority of the proposed land use changes limited to thirteen primary study areas. New development in accordance with the General Plan Update would result as re-use of economically underperforming properties and obsolete development, conversion of uses in response to market demand (e.g., office and commercial to residential) and more intense use of land in defined areas.

VCWPD1-1

October 21, 2011  
 RMA 09-055-1, DEIR Simi Valley General Plan Update  
 Page 2 of 3

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

The DEIR at Section 4.9 Hydrology/Water Quality and Impact 4.9-4 states that development under the General Plan Update could alter the existing drainage patterns in the Planning Area and potentially result in increased downstream flooding through the addition of impervious surfaces, exceeding the capacity of existing or planned stormwater drainage systems. The DEIR further states that implementation of General Plan Update policies and compliance with applicable stormwater regulations would reduce this impact to less than significant.

The General Plan Update policies include requirements for incorporation of stormwater detention facilities and minimization of increases in impervious areas. Implementation of these policies would reduce the volume of runoff generated, and potential for flooding, throughout the Planning Area and downstream.

The following comments are offered to assist the City in adequately characterizing the existing and potential flooding for master planning purposes.

1. The Hydrology Impacts are characterized as "Less Than Significant (LTS)". In the existing condition, FEMA mapping and related information indicate that substantial areas within Simi Valley are subject to flood hazard. It is suggested that the DEIR should address mitigation of the existing flood hazards as part of the master plan effort.
2. An indication of the potential for increased flood flows (increased impervious areas) generated by new development follows. From Page 4.16-37, table 4.16-9, Development Assumptions, and Page 4.13-2 Table 4.13-1, Population and Households, the DEIR indicates that population may increase at a rate of 1.3% through the year 2030 with the following potential projections for the years from 2006 (existing conditions) to 2030 (build out). Housing may increase from 44,799 dwelling units to 60,719 dwelling units (35%). Commercial areas may increase from 6,949,000 square feet to 9,029,000 square feet (30%). Office Buildings may increase from 999,000 square feet to 12,090,000 square feet (1110%). Business Parks may increase from 1,116,000 square feet to 13,364,000 square feet (1100%), and Industrial areas may increase from 8,241,000 square feet to 12,600,000 square feet (53%). All of these projected developments can result in significant additional storm water generation adding to existing problems unless the developments are conditioned to not increase pre-development levels of runoff. It is suggested that this specific requirement be treated more fully in the EIR.
3. From Page 4.10-9, Figure 4.10-2, Areas of Potential Land Use Change, it is shown that the potential land use change areas are mostly located in the Arroyo Simi Corridor, or the future projects may be re-development of existing developed

VCWPD1-2

VCWPD1-3

VCWPD1-4

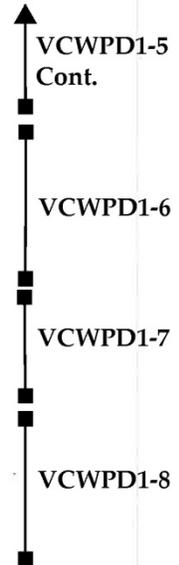
VCWPD1-5

October 21, 2011  
RMA 09-055-1, DEIR Simi Valley General Plan Update  
Page 3 of 3

areas with higher densities. Knowing that the Arroyo Simi can't handle additional flows, any increase in runoff due to development must be mitigated by onsite detention or retention.

4. Page 2-17 mentions increased demand for water supply and wastewater treatment. Any increase in water supply will cause a direct increase in wastewater generation that can impact peak flows from the point where effluent discharges meet the receiving stream during intense storms. That aspect should also be considered to make sure the receiving stream can handle the flows.
5. From Page 4.9-9, Storm Drain Infrastructure, it is mentioned that an average increase of 1.5 times the current discharge rates is expected for Arroyo Simi in the future. The methods proposed for attenuating this potential increase should be treated in greater detail.
6. Mitigation of existing flood hazards could be treated more fully in the DEIR. The District is currently engaged in a planning effort to refine information about flood hazards in the Upper Calleguas Watershed, including Simi Valley. Information concerning the current status of this effort, such as presented at ongoing stakeholders meetings, may be useful for inclusion in the EIR documentation.

END OF TEXT



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



VCWPD2

**Ventura County  
Watershed Protection District  
Groundwater Section**

**MEMORANDUM**

**DATE:** October 20, 2011

**TO:** Laura Hocking, Dawnyella Addison,

**CC:** Karen Martia

**FROM:** Rick Viergutz *Rick Viergutz*

**SUBJECT:** RMA 09-055-1 SIMI VALLEY GENERAL PLAN- REQUEST FROM SIMI VALLEY FOR REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SIMI VALLEY GENERAL PLAN UPDATE (GPA-0075)

This office conducted a review of the subject document. Our review was primarily focused on learning more about proposed changes in groundwater extractions and how that would affect groundwater levels, and surface water flows. We were also interested in learning more about how water recycling or reclamation of treated wastewater, or groundwater and/or surface water with high total dissolved solids may be envisioned for the future. Again, our interest on future proposed water reclamation is geared toward how that new use would affect groundwater levels and surface water flows, and what the disposition of the waste stream would be.

Please see below.

Section 4.9 Hydrology/Water Quality describes that the City of Simi Valley obtains groundwater from the Simi Valley groundwater basin and the Conejo-Tierra Rejada Groundwater Basin. Exact amounts of groundwater extracted were not included in that discussion. The document describes that the western part of the Simi Valley groundwater basin is composed of finer grained sediments than the eastern area, and confined groundwater conditions exist in the western part of the basin. The subject document describes that groundwater recharge to the basin comes from overlying streams, percolation of direct precipitation, and irrigation return. The subject document also states that during periods of overdraft, the slope of the groundwater surface reverses and groundwater may flow in an easterly direction. However, the section goes on to state hydrographs show that water levels have typically remained the same or risen since 1980.

1. The Draft EIR should clarify when and where groundwater basin overdraft conditions occur and the effect, if any, on surface water flows in the creek.
2. The Draft EIR should include a simple table showing the past annual discharge volume of treated wastewater and groundwater from dewatering systems to the creek. The table should include the TDS of each source.
3. The Draft EIR should be revised to include a simple table that quantifies annual groundwater extraction from the groundwater basins (should include all basins, including Gillibrand, Simi Valley, Conejo-Tierra Rejada), and the annual amount of imported water for potable uses.

VCWPD2-1

VCWPD2-2

VCWPD2-3

VCWPD2-4

VCWPD2-5

The subject document describes that groundwater storage has increased significantly in the last several decades, necessitating dewatering operations in order to protect development in the western portion of the City. This increase in stored groundwater is due to a combination of an overall decrease in agricultural use of groundwater because of high TDS levels and increased return flows from applied imported water to Simi Valley.

The document (page 4.9-31) indicates that 96 percent of the water delivered to Simi Valley is imported water via the State Water Project. The document states that the remaining 4% of water used is from groundwater sources and that any future development would rely on imported water sources with little to no use of groundwater resources. *Note that later in the document it appears that future water development may be served by recycled water, indicating that the source for recycled water would be wastewater treatment plant discharges, not treatment of groundwater and surface water with high total dissolved solids.*

VCWPD2-6

The document describes the use of recycled water and a brine line, but tables 4.17-1 and 4.17-2 do not show a significant increase in recycled water through the year 2035. Table 4.17-2 shows that starting in 2015, the GSWC will increase its local groundwater extractions approximately 300%.

4. The Draft EIR should describe where this increased groundwater extraction will take place, if the groundwater will need treatment to remove salts and where the brine will be discharged. Will the proposed increases in groundwater extraction create overdraft or a decrease in surface water flows?

VCWPD2-7

Page 4.17-8 describes that the District's 2008 Recycled Water Master Plan Update identifies a potential demand of 9,000 acre feet per year, versus the current 60 acre feet per year demand.

5. The Draft EIR should describe the proposed source of this recycled water and any waste discharge from the treatment of the water.

VCWPD2-8

The document describes that the District is studying the possibility of using the Simi Valley Groundwater Basin to provide additional groundwater supply, but that the water would need treatment and brine would need to be discharged.

The document describes that the GSWC intends to develop plans to increase utilization of location groundwater resources for the Simi Valley System through the user of reverse osmosis, and would discharge brine into the brine line when completed.

VCWPD2-9

6. The Draft EIR provides a forward looking view that groundwater supplies and or treated wastewater supplies will be reclaimed at higher amounts in the future; however it isn't clear that the increased use of groundwater or treated wastewater has been quantified. Also, it isn't clear that the Draft EIR analyzes the environmental effects, if any, of increased groundwater extractions and or decreased surface water flows. The Draft EIR should be revised to include better quantification of resource use and potential environmental effects, if any.

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

**VCAPCD**

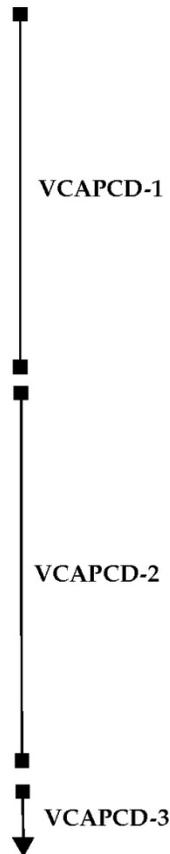
**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT  
Memorandum**

**TO:** Laura Hocking/Dawnyelle Addison, Planning    **DATE:** October 12, 2011  
**FROM:** Alicia Stratton  
**SUBJECT:** Request for Review of Draft Environmental Impact Report (DEIR) for the Simi Valley General Plan Update, City of Simi Valley (Reference No. 09-055-1)

Air Pollution Control District staff has reviewed the subject DEIR, which is a proposal for a comprehensive update to the City’s General Plan. It serves as the official statement of the jurisdiction regarding the extent and types of development needed to achieve the community’s physical, economic, social and environmental goals, and establishes an overall development capacity for the City, its share of influence and surrounding areas, and serves as a policy guide for determining the appropriate physical development and character of the City. Table 1 of the DEIR, *Existing, Proposed and Net Difference in Land Uses*, indicates that increases in residential, commercial, office and other uses will occur, although some land uses would decrease. The project location consists of several study areas and all the properties located within the City of Simi Valley, the Simi Valley City Urban Restriction Boundary, the City’s Sphere of Influence and the Simi Valley Area of Interest.

Section 4.3 of the DEIR addresses air quality issues. We concur with the findings of this discussion that operational and cumulative adverse impacts to air quality would result from the project. Page 4.3-20, *Significant and Unavoidable Impacts*, discusses air quality impacts that would result from the project. These include Impact 4.3-4, construction emissions (significant and unavoidable impacts), Impact 4.3-5; Growth that exceeds the SCAG projections for the City and would conflict with or obstruct implementation of the Air Quality Management Plan (significant and unavoidable impacts); Impact 4.3-6, Operational emissions of PM10 and PM2.5 that contribute substantially to an existing or projected air quality violation (significant and unavoidable impacts); and Impact 4.3-7, a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or state ambient air quality standard (significant and unavoidable impacts).

Cumulative air quality impacts related to consistency with the Air Quality Management Plan are expected to result from the project, and are considered significant and

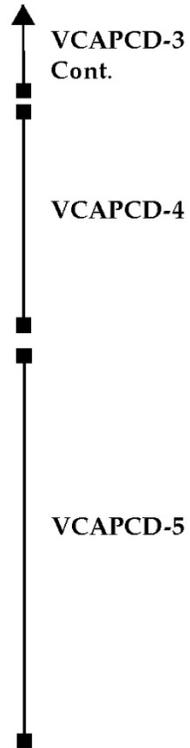


unavoidable. Implementation of the General Plan Update would result in a significant and unavoidable impacted related to a net increase in criteria pollutants.

We note that the City currently has plans to expand its existing wastewater treatment plant and add a reclaimed water pump station and reclaimed water pipelines to accommodate the reclaimed water program proposed by the City. However, the wastewater treatment expansion plan is based on current General Plan build out and SCAG population projections and is not a result of the growth anticipated under the updated General Plan. If the proposed project were not implemented, the wastewater expansion would still occur.

Air quality mitigation measures are addressed in Section 4.3 as well. We concur with the mitigation measures described in this chapter. Thirteen policies are presented in the discussion titled *General Plan Policies that Mitigate Potential Impacts on Air Quality*, beginning on Page 4.3-12. Each of these policies and goals from the Community Development, Mobility-Infrastructure, and Natural Resources chapters would mitigate potential impacts on air quality. In addition to these measures, additional dust suppression mitigation measures are described on Page 4.3-20. Further, mitigation measures designed for projects that are inconsistent with the Air Quality Management Plan are described on Page 4.3-23. Because actual project operational emissions cannot be quantified at this time, Table 4.3-5, *Implementation of Recommended VCAPCD Plan-Level Measures* presents strategies that will reduce vehicle miles traveled and as such will further reduce emissions.

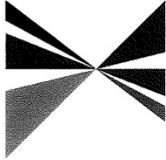
If you have any questions, please call me at (805) 645-1426.



# Southern California Association of Governments (SCAG), October 25, 2011

## SCAG

SOUTHERN CALIFORNIA



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October 18, 2011

Ms. Lauren Funaiole  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, CA 93063-2100  
(805) 583-6772

**RE: SCAG Comments on the Draft Environmental Impact Report for the Simi Valley General Plan Update [20110142]**

Dear Ms. Funaiole:

Thank you for submitting the **Draft Environmental Impact Report for the Simi Valley General Plan Update [20110142]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act (CEQA) Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act Guidelines, Sections 15125 and/or 15206. The proposed project will establish an overall development capacity for the City of Simi Valley and surrounding areas, and will serve as a policy guide for determining the appropriate physical development and character of the City.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895. Thank you.

Sincerely,

JACOB LIEB, Manager  
Environmental and Assessment Services

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The Regional Council is comprised of 84 elected officials representing 190 cities, six counties, six County Transportation Commissions and a Tribal Government representative within Southern California.

5.9.11

October 19, 2011  
Ms. Funaiole

SCAG No. I20110142

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
CITY OF SIMI VALLEY GENERAL PLAN UPDATE [I20110142]**

**PROJECT LOCATION**

The City of Simi Valley lies in southeastern Ventura County, next to the northwestern perimeter of the San Fernando Valley. The community straddles the Ronald Reagan Freeway (SR-118), and is close to the Santa Monica Mountains National Recreation Area. Simi Valley is within a crescent-shaped valley surrounded by steep hills. It is separated from the San Fernando Valley in Los Angeles County by the rugged Santa Susana Mountains north and east, rising to more than 3,000 feet, which also separate it from the Fillmore-Piru valley to the north. The Simi Hills to the south, rising to approximately 2,500 feet, separate the valley from the Conejo-Coastal Plain of Ventura County. The City is connected to regional centers by Amtrak and Metrolink, and schedule transit service is provided by VISTA Coastal Express buses and Simi Valley Transit Division.

**PROJECT DESCRIPTION**

The City of Simi Valley is largely urbanized with limited vacant land area. The updated General Plan focuses on how limited population and employment changes and emphasis on trip reduction strategies can be strategically managed to preserve the distinguishing and valued qualities of the City, support a thriving economy that benefits that City's residents' quality of life, and to achieve a sustainable and integrated system of land use and transportation in the City of Simi Valley consistent with the requirements of recent state legislation. Of primary importance, the General Plan Update conserves the existing pattern of uses and establishes policies for the protection and long-term conservation of established residential neighborhoods. The majority of the land use changes that would be allowed under the General Plan Update would be focused in areas around nodes along primary commercial and transit corridors in the City.

The city of Simi Valley has developed a set of guiding principles of objectives that provide a framework for planning and confirming growth and land use development demands. The principles direct how and where growth will be distributed throughout the City within the context of natural resource protection and neighborhood conservation. Guiding principles are nonnegotiable criteria that will guide updating the General Plan. The principles guide development of a land use plan and constitute a set of rules by which updated policies will be written and enforced. The guiding principles categories are as follows:

- Natural and Environmental Resources
- Community Identity, Character, and Design
- Land Use and Growth Management
- Neighborhood Security and Housing Choice
- Economic Vitality and Security
- Public Services, Infrastructure, and Mobility
- Health, Social and Cultural Well-Being

The General Plan Update focuses on how population and employment growth can be strategically accommodated to preserve the distinguishing and valued qualities of the community. For most of the City, the General Plan Update conserves the existing pattern of uses and establishes policies for protection and long-term maintenance of established neighborhoods. The General Plan Update provides comprehensive policies for the entire City and is intended to be a comprehensive update from the City's current General Plan, last updated in 1988.

The Planning Area comprises all properties located within the following boundaries: The City limits of Simi Valley (approx. 27,056 acres); the Simi valley City Urban Restriction Boundary (3,039 acres beyond City limits); and the City's Sphere of Influence (4,001 acres abutting City limits); and the Simi Valley Area of

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Interest (total 32,230 acres). The General Plan Update contains policies regarding future land use and development addressed from a Citywide perspective, with the majority of the proposed land use changes limited to thirteen primary study areas. New development in accordance with the General Plan Update would result as re-use of economically underperforming properties and obsolete development, conversion of uses in response to market demand and more intense use of land in defined areas.

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Cont.

**CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN**

**Regional Growth Forecasts**

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

**Adopted SCAG Regionwide Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

**Adopted Gateway Cities VCOG Subregion Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	97,532	99,408	104,182	108,223	111,758	114,035
Households	31,783	32,696	33,681	34,504	35,234	35,928
Employment	45,219	46,059	46,822	47,477	48,023	48,506

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**Adopted City of Simi Valley Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	126,474	130,402	132,030	133,407	134,613	135,389
Households	41,462	43,118	43,330	43,508	43,666	43,815
Employment	47,835	52,381	56,869	60,715	63,920	66,760

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

**SCAG Staff Comments:**

Page 4.13-5 indicates that the DEIR population, household and employment analyses were based on 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

***Regional Transportation Plan Goals:***

**RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*

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Ms. Funaiole

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- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the proposed project partially meets consistency with Regional Transportation Plan Goals. The proposed project is not applicable to RTP G3 and RTP G7 because it is not transportation project.

SCAG staff finds that the proposed project generally meets consistency with RTP G1. The proposed project incorporates Policy Measures M-1.1 and M-1.2 that establish a diverse and integrated transportation system within the General Plan boundaries that provide mobility options and support the land use plan (Page 4.10-52).

SCAG staff finds that the proposed project generally meets consistency with RTP G2. Per page 4.10-54, the proposed project encourages policies that promote safe and reliable transit design as well as improvements to the bicycle network and alternative transportation modes to ensure a safe and reliable transportation system for the community that is integrated within the region (Page 4.10-52).

Per RTP G4, the proposed project generally meets consistency. According to page 4.10-53, policies M-5.1, M-5.2 and M-5.3 implemented in the proposed project will monitor traffic conditions to optimize operations on an ongoing basis and reduce travel time along major corridors.

SCAG staff finds that the proposed project is partially consistent with RTP G5. Per page 4.10-57, the proposed project encourages TDM strategies that reduce VMT, but encourage new development that may emit pollution and reduce air quality.

SCAG staff finds the proposed project meets consistency with RTP G6. The proposed project encourages development to be located within the Urban Restriction Boundary, prioritize infill and redevelopment of existing developed areas through the implementations of Policies LU-1.2 and LU-1.3 (Page 4.10-39).

**COMPASS GROWTH VISIONING**

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principles” are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

***Principle 1: Improve mobility for all residents.***

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*



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Cont.

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**SCAG Staff Comments:**

SCAG staff finds that the proposed project partially meets consistency with Principle 1.

SCAG staff finds the proposed project generally meets consistency with GV P1.1. The proposed project contains policies to integrate land use and development patterns that interface with transportation infrastructure decisions. Policy LU-3.2 in particular encourages a citywide development pattern that promotes efficient development, minimizes the impact of traffic congestion, and reduces travel distances (Page 4.10-40).

Per GV P1.2, SCAG staff finds the proposed project meets consistency. Per page 4.13-6, an improvement in the jobs/housing ratio would occur at the full build-out of the General Plan Update in comparison to SCAG's project forecast for 2035—1:32 in comparison to 1:52.

In regards to GV P1.3, SCAG staff finds the proposed project is consistent. Per Policy LU-24.2, the proposed project will promote the development of a new Metrolink transit station to serve the western portion of Simi Valley and intensify development within its proximity (Page 4.10-49)

SCAG staff finds the proposed project meets consistency with GV P1.4. Per Policy M-8.4, the proposed project aims to accommodate alternative modes by improving alternative mode infrastructure, encouraging transit subsidies and transportation demand measures among other activities (Page 4.16-41).

***Principle 2: Foster livability in all communities.***

**GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*

**GV P2.2** *Promote developments, which provide a mix of uses.*

**GV P2.3** *Promote "people scaled," walkable communities.*

**GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

**SCAG Staff Comments:**

SCAG staff finds that the proposed project meets consistency with Principle 2.

Per GV P2.1, SCAG staff finds the proposed project meets consistency. The proposed project contains policies to ensure cost-efficient land use planning that utilizes redevelopment and infill techniques. (Page 3.1-22)

SCAG staff finds the proposed project to be meet consistency in regards to GV P2.2. The proposed project includes a number of areas designated as mixed use, promoting a variety of uses including residential, commercial, office and service uses (Page 4.10-60).

SCAG staff finds the proposed project meets consistency with GV P2.3. Per Policies LU-3.6 and LU-3.7 included in the General Plan Update, the proposed project will encourage the development of buildings whose scale and ground floor elevation and exterior spaces are designed to relate and encourage pedestrian activity and relate to public, pedestrian-oriented spaces (Page 4.10-41).

Per GV P2.4, SCAG staff finds the proposed project meets consistency. Per Policy LU-5.3 of the proposed project, the scale and character of existing residential neighborhoods including single-family neighborhoods will be preserved when considering new development and renovations of buildings in existing neighborhoods (Page 4.10-42).

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Cont.

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**Principle 3: Enable prosperity for all people.**

- GV P3.1** *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2** *Support educational opportunities that promote balanced growth.*
- GV P3.3** *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4** *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5** *Encourage civic engagement.*

**SCAG Staff Comments:**

SCAG staff finds that the proposed project meets consistency with Principle 3 where applicable.

Per GV P3.1, SCAG staff finds the proposed project to be consistent. The proposed project includes Policy ED-3.1, which ensures that a selection of both single-family and multi-family housing types are available, providing a variety of housing densities, types and prices to all income levels (Page 4.13-10).

SCAG staff cannot determine consistency with GV P3.2, GV P3.3, and GV P3.4 based on the information provided in the DEIR.

SCAG staff finds the proposed project is consistent with GV P3.5. Policy CS-1.8 incorporated in the General Plan Update will work with public and non-profit agencies and service providers to publicize, promote and coordinate volunteer opportunities for community services and programs (Page 4.10-55).

SCAG-6

**Principle 4: Promote sustainability for future generations.**

- GV P4.1** *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2** *Focus development in urban centers and existing cities.*
- GV P4.3** *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4** *Utilize "green" development techniques*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the project is partially consistent with Principle 4.

SCAG staff finds the proposed project meets consistency with GV P4.1. Per page 4.10-41 and 4.10-61, the proposed project contains goals and policies that preserve the City's sensitive ecological areas and protect its open space and recreational resources.

In regards to GV P4.2, SCAG staff finds the proposed project meets consistency. The proposed project contains development within a City Urban Restriction Boundary located within the City of Simi Valley jurisdiction (Page 4.10-39).

SCAG staff finds the proposed project meets consistency with GV P4.3. Per page 4.10-62, several policies are in place to provide an overall land use patten that promotes efficient development, reduce air pollution and greenhouse gas emissions and diversion of waste.

Per GV P4.4, SCAG staff finds the proposed project meets consistency. Per Page 4.10-43, two policies are incorporated in the proposed project (LU-8.1 and LU-8.2) that implement, promote and regulate sustainable development and building practices.

SCAG-7

**October 19, 2011**  
**Ms. Funaiole**

**SCAG No. I20110142**

**CONCLUSION**

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:  
[http://www.scag.ca.gov/igr/documents/SCAG\\_IGRMMRP\\_2008.pdf](http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf)

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

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