

VEN-20

Comment noted. The park/open space area includes detention basins that will not generate traffic. Modifying the average daily traffic as suggested in the comment would not alter study analyses or conclusions.

VEN-21

Comment noted. The industrial uses represent the most intensive use for the public facilities zone along Vineyard Avenue north of North Park Drive. This planning area would specifically allow the development of a fire station and administrative facilities for the Rio Elementary School District.

VEN-22

Office is an allowed use in District D. The traffic analyses contained the maximum (worst case) generation under the proposed specific plan as shown in Table 4.8-8.

VEN-23

Comment noted. A reduction in the number of multi-family dwelling units in District F will not increase potential impacts analyzed in the traffic study.

VEN-24

Please see the response to comment VEN-12 for a discussion of traffic study methodology and the response to comment VEN-17 for discussion of modeling data procedures and availability. The data included in Table 4.7-7 in the Draft EIR gives the distribution of trips produced by the model. This data is a summary of model results, rather than a "method." The traffic study methodology of comparing the "With Project" conditions to "Without Project" conditions was determined to adequately and accurately portray project and cumulative traffic impacts. A select zone analysis would not have identified all project traffic impacts, such as rerouted trips using the new project roadways, and, thus, would be misleading.

VEN-25

A comparison of Figures 4.8-8 and 4.8-7 with 4.8-6 and 4.8-5 shows the peak hour impacts of the project. The project will build new roadways and redistribute trips in addition to generating trips. Therefore, a select link analysis presentation was determined to be misleading for this analysis because it would not accurately portray trips added by the project to roadways in the area.

VEN-26

The standard City of Oxnard traffic model was utilized which reflects the mix of residential, commercial, school and other issues included in the RiverPark Specific Plan. When all trip purposes are considered, the trip distribution projected by the City of Oxnard model is reasonable. The City's traffic model is based on the Ventura County Transportation Commission (VCTC) model and uses standard modeling procedures. When the mixed-use character and the magnitude of the Specific Plan are considered, the proportion of project vehicle trips projected to remain within the Specific Plan Area by the City's traffic model is reasonable.

VEN-27

The Draft EIR evaluates the RiverPark Specific Plan as proposed. A phase one infrastructure plan is defined within the Specific Plan. The roadways included in the Specific Plan allows both for travel through the Specific Plan Area by cumulative traffic and for providing service throughout the study area. The phase one infrastructure plan addresses continuity rather than capacity. The roadways in the first phase of the infrastructure plan would support will be built to their ultimate planned width and would support and accommodate all of the permitted land uses in the first phase area. No analysis of the development allowed by this first phase of infrastructure is, therefore, warranted.

VEN-28

This comment is not specific as to which specific improvements would not be completed prior to 2020. The City of Oxnard traffic impact fee program will ensure that all roadway improvements will be provided as needed. In particular, the rebuilding of the U.S. 101 mainline and the Oxnard Boulevard interchange has already been designed and construction will begin shortly.

All other improvements will also be in place prior to build-out of the Specific Plan. Traffic impact fees will be paid to the City of Oxnard as individual development projects are built within the Specific Plan

Area. The responsibility of the City, County, and State to maintain acceptable conditions would not be altered by this project and it is reasonable to expect that they would maintain these standards given their existing programs. The Phase One improvements are called out in the Specific Plan only to make certain that a transportation backbone is provided for initial development of the project. This backbone system is provided to ensure the continuity of the roadway system, rather than in direct response to any level of service issues or impacts.

VEN-29

The greatest traffic impacts will occur at build-out of the Specific Plan. It is speculative to assume that the office and commercial uses would build-out before the residential development. Also, it should be noted that the second phase of the infrastructure phasing plan could be built at any time following completion of the first phase if there is market demand for the land served by the second phase of infrastructure. The infrastructure phasing plan only addresses the sequence in which the infrastructure will be built to support the permitted land uses. No development phasing is proposed. For this reason, it would be speculative to provide any "short-term" analysis as suggested in this comment. Please see the response to comment VEN-7 for a full discussion of the phasing plan. Please also see the response to comment VEN-28 above.

VEN-30

Please see the response to comment VEN-14. As stated in that response, peak hour conditions, which are analyzed in the Draft EIR, will be the most congested throughout the day and will determine the need for mitigation. Therefore, daily traffic volumes are not relevant for determining project impacts.

VEN-31

Comment noted. The lane configurations for each scenario at each study intersection are shown in Appendix C of the project traffic study, which is Appendix 4.8 in Volume III of the Draft EIR.

VEN-32

All of the assumed improvements to the regional highway system are discussed on pages 33 and 34 of the traffic study. The largest changes are the on-going improvements to the U.S. 101 freeway. Lane configuration assumptions are shown in Appendix C. No intersection improvements were assumed in the City of Ventura.

VEN-33

The modifications requested in this comment have been made as shown in the revised table following this page, but do not change the conclusions of the study.

VEN-34

Please see Appendix A of the traffic study for the traffic model run data for a Kimball Road crossing. This model run examines traffic conditions in the area with an extension of Kimball Road across the Santa Clara River connecting to Santa Clara River Boulevard as planned in the Specific Plan Area. First, it should be noted that the traffic analysis of the project demonstrates that acceptable levels of service can be maintained on roadways and at intersection in Ventura and Oxnard without the Kimball Road extension. A traffic model run with a bridge across the Santa Clara River in alignment with Kimball Road was provided in Appendix A to the Draft EIR. This model run shows that extending Kimball Road across the Santa Clara River would not result in any substantial improvement in the operating conditions of any of the roadways or intersections in the area or avoidance of any of the impacts of the RiverPark Project.

With regard to the future extension of Kimball Road, as shown on the City of Ventura Circulation Element, it is important to note that the Circulation Element of the City Of Oxnard General Plan has never provided for this roadway connection. In addition, the City of Ventura Comprehensive Plan and the Comprehensive Plan EIR do not include any information that justifies the need for this roadway extension. Kimball Road is identified on the Ventura Comprehensive Plan Circulation Map as a "Future Extension" of an arterial roadway as opposed to a "Future Widening" to be accomplished by the horizon year of the Ventura Comprehensive Plan. The extension of North Bank Drive north to the Kimball Road extension is also shown as this type of Future Extension on the Ventura Circulation Element Map. The Circulation Element text does not define the term "Future Extension." The only specific reference to roadway extensions is the text in Policy 1.2 under the heading Objective 1 - Long-Range Circulation Plan – in the Circulation Element, which reads:

"The long-range circulation system depicts proposed roadway extensions across agricultural lands. These proposed roadways are not intended to be extended until development which is consistent with the Comprehensive Plan occurs, or until they become necessary to accommodate traffic. Such roads should be designed as urban parkways."

Table 4.7-9
Future (2020) Freeway Volumes and Level of Service

CMP Station	Dir.	Peak Hour	Freeway Capacity	Future (2020)			Future (2020)			Future (2020)		
				Without Project Traffic Conditions			With Project Traffic Conditions			With Project Traffic Conditions		
				Daily Volume	Peak Hour Volume	D/C Ratio	Daily Volume	Peak Hour Volume	D/C Ratio	Daily Volume	Peak Hour Volume	D/C Ratio
US 101 at the Santa Clara River Bridge	N/B	AM	12,000	199,600	8,530	0.711	199,600	8,530	0.711	214,100	8,833	0.736
	PM	PM	12,000		9,460	0.788		10,072	0.839		10,072	0.839
US 101 between Route 1 and Vineyard Avenue	S/B	AM	12,000		8,310	0.693		8,828	0.736		8,828	0.736
	PM	PM	12,000		6,400	0.533		7,188	0.599		7,188	0.599
US 101 between Route 1 and Vineyard Avenue	N/B	AM	10,000	169,000	6,610	0.661	169,000	7,143	0.714	180,000	7,143	0.714
	PM	PM	10,000		8,290	0.829		9,077	0.908		9,077	0.908
US 101 between Vineyard Avenue and Rose Avenue	S/B	AM	10,000		6,010	0.601		6,156	0.616		6,156	0.616
	PM	PM	10,000		6,780	0.678		7,122	0.712		7,122	0.712
US 101 between Vineyard Avenue and Rose Avenue	N/B	AM	10,000	177,600	7,050	0.705	177,600	7,533	0.753	187,400	7,533	0.753
	PM	PM	10,000		8,350	0.835		8,661	0.866		8,661	0.866
Oxnard Boulevard (Route 1) between Vineyard Ave. and US 101	S/B	AM	10,000		6,510	0.651		6,794	0.679		6,794	0.679
	PM	PM	10,000		7,190	0.719		7,724	0.772		7,724	0.772
US 101 south of Central Avenue	N/B	AM	4,000	32,300	1,230	0.308	32,300	1,296	0.324	35,100	1,296	0.324
	PM	PM	4,000		1,290	0.323		1,374	0.344		1,374	0.344
US 101 south of Central Avenue	S/B	AM	4,000		1,240	0.310		1,413	0.353		1,413	0.353
	PM	PM	4,000		1,330	0.333		1,443	0.361		1,443	0.361
US 101 south of Central Avenue	N/B	AM	8,000	182,400	7,940	0.993	182,400	8,258	1.032	187,700	8,258	1.032
	PM	PM	8,000		7,110	0.889		7,250	0.906		7,250	0.906
US 101 south of Central Avenue	S/B	AM	8,000		5,980	0.748		6,086	0.761		6,086	0.761
	PM	PM	8,000		8,000	1.000		8,287	1.036		8,287	1.036

The Introduction to the Circulation Element states:

"The changes or increases in demands on the City's roadways and circulation system that may result from land use changes in implementing this Plan are described in the Traffic and Circulation Section (6.18) of the Master Environmental Impact Report for the Comprehensive Plan Update to the Year 2010 (April 1989). This section of the EIR is incorporated in this Plan by reference. The Circulation Plan Map reflects the analysis of impacts resulting from potential changes in land use"

The EIR for the City of Ventura Comprehensive Plan examined several land use alternatives for the Comprehensive Plan and concluded that the higher density alternatives would require more traffic capacity at the south edge of the City to reduce impacts on Johnson Drive. The lowest density land use alternative was adopted in the Comprehensive Plan, and this land use alternative would not require added capacity at the south edge of the City. Further, no actual traffic study was made of the benefits of the Kimball Road extension. Any benefit from the bridge was an assumed model input, rather than a demonstrated benefit shown by comprehensive traffic modeling. The traffic modeling included in the Comprehensive Plan EIR assumed volumes on the Kimball Road extension rather than modeling potential river crossing volumes southward until they come to a common cordon point. The assumptions made in the traffic analysis in the Comprehensive Plan EIR, do not, therefore, justify the need for the Kimball Road extension.

The City of Ventura placed the Kimball Road crossing as a future roadway extension on its Circulation Element Map. It should be noted that the alignment shown on the Circulation Element Map is not the same alignment considered in the traffic analysis in the Comprehensive Plan EIR. The alignment for the Kimball Road extension as shown on the Ventura Circulation Element Map and the County 2020 Roadway Network Map is shown on **Figure 2-2** on the following page. The alignment on the Ventura Circulation Element Map would extend across the open mine pits on the Hanson Aggregates Mine site and connect to Vineyard Avenue at the northern edge of the El Rio Residential Community. The traffic analysis in the Comprehensive Plan EIR considered an alignment further south. The information in the Comprehensive Plan EIR does not justify the current alignment for the Kimball Road extension as required by Policy 1.2 of the Ventura Circulation Element.

In order to fully assess the need for the Kimball Road extension, the City of Oxnard prepared a traffic model run with this roadway link which was provided in Appendix A of the River Park Specific Plan traffic study. This analysis concluded the original alignment of the Kimball Road extension identified in the Ventura Comprehensive Plan EIR would not result in any substantial improvement in traffic conditions on roadways in the area, including Johnson Drive in Ventura. The traffic modeling completed with an extension of Kimball Road to Santa Clara River Boulevard in the project shows that there would be a minimal change of less than seven percent in the ICU value for peak hour traffic



FIGURE 2-2

Kimball Road Extension

conditions at the Johnson Drive/North US-101 Ramps (North Bank) intersection, resulting in no change to the Level of Service. Adding the Kimball Road extension to the area roadway network resulted in the actual traffic volumes at this Johnson Drive intersection dropping less than three percent (approximately 160 trips). The results of the traffic modeling are shown in **Table 11** below.

Table 11
Johnson Drive/North US-101 Ramps (North Bank)
Intersection Analysis

	AM Peak Hour			PM Peak Hour		
	ICU	LOS	Volume	ICU	LOS	Volume
Without Bridge	1.357	F	6,051	1.669	F	8,052
With Bridge	1.310	F	5,895	1.560	F	7,897
Bridge Benefit	(0.047)	--	(156)	(0.109)	--	(155)
% Benefit	3.5%	--	2.6%	6.5%	--	1.9%

Further, given the ongoing improvements to US 101 over-crossing of the Santa Clara River, no justification can be made for an additional river crossing in the area. The Kimball Road extension alternative studied in the River Park traffic study was selected not only because it was analyzed in the City of Ventura Comprehensive Plan EIR, but because it was the most probable alignment in the opinion of those preparing the River Park Specific Plan traffic study as well. Also, this alignment was that crossing most likely to benefit the Johnson Drive interchange, the stated goal of extending Kimball Road identified in the City of Ventura Comprehensive Plan EIR.

As a supplement to the traffic modeling contained in Appendix A to the Draft EIR, additional runs of the City of Oxnard traffic model were completed to determine the potential benefits of the Kimball Road extension in the alignment shown on the Ventura Circulation Element Map. As stated above, Appendix A addressed the most beneficial crossing, which was the alignment included in the traffic study for the City of Ventura Comprehensive Plan. Based on the Comprehensive Plan adopted by the City of Ventura, the County of Ventura placed a Kimball Road extension on the County 2020 Roadway Network Map in the more northerly alignment shown on the exhibit on the previous page. As stated above this alignment would cross the open mine pits on the Hanson Aggregates Mine Site, cross Vineyard Avenue through the prime agricultural lands immediately north of the El Rio and Nyeland Acres residential neighborhoods and connect to the Ventura Freeway in Oxnard at the Del Norte Boulevard interchange. It should be noted that this roadway extension was added to the County of Ventura Roadway Network Map at the

request of the City of Ventura General Plan, but no additional traffic analysis was conducted by the County to demonstrate the need for this roadway extension.

To analyze the alignment currently shown on the County's Roadway Network Map, additional traffic model runs were also prepared to supplement the traffic model runs in Appendix A to the Draft EIR. This analysis showed that this alignment for extension of Kimball Road would result in even less change in traffic conditions at the Johnson Drive/North US 101 Ramps (North Bank) intersection than the alignment further south. Peak hour traffic volumes at this intersection would drop a maximum of 120 trips in the P.M. peak hour, resulting in a change in the ICU value of 1.5 percent or less as shown in **Table 12** below. No change to the level of service of the Johnson Drive/North US-101 Ramps (North Bank) Intersection would result.

Thus, the Kimball Road extension as currently shown on the City of Ventura Circulation Element and County of Ventura Roadway Network Map would be less effective traffic measure than that alignment considered in the City of Ventura's Comprehensive Plan EIR and analyzed in Appendix A of the traffic study for River Park. However, neither alignment would improve the operating condition of Johnson Drive at the northbound US 101 ramps to a substantial degree as demonstrated by the information presented in **Tables 1 and 2**.

Table 12
Johnson Drive/North US-101 Ramps (North Bank)
Intersection Analysis

	AM Peak Hour			PM Peak Hour		
	ICU	LOS	Volume	ICU	LOS	Volume
Without Bridge	1.357	F	6,051	1.669	F	8,052
With Bridge	1.344	F	5,986	1.619	F	7,931
Bridge Benefit	(0.013)	--	(65)	(0.050)	--	(121)
% Benefit	1.0%	--	1.1%	3.0%	--	1.5%

The minor benefit provided by extending Kimball Road across the Santa Clara River must also be viewed in terms of environmental and monetary costs. The EIR for the City of Ventura Comprehensive Plan estimated a cost of over \$12 million to extend Kimball Road across the river more than 10 years ago. This cost has risen with the passage of time. The estimated cost for the US 101 bridge would indicate that, ignoring the surface streets leading to the bridge, the actual cost already will be well in excess of that estimate. When the roadways within the City of Ventura and Oxnard are combined with the roadway

through the prime agricultural land in the County, the monetary cost for this roadway extension would be prohibitive. It should also be noted that the Kimball Road extension is currently an unfunded improvement which is not part of the traffic fee program for the City of Ventura.

The discussion above of the cost of extending Kimball Road does not account for the environmental consequences of a Kimball Road bridge. The current alignment would require the extension of Kimball Road across agricultural land in Ventura, including land recently purchased by the Nature Conservancy with a grant from the California Coastal Conservancy. This 220-acre site represents the first purchase of property for the Santa Clara River Parkway planned by the California Coastal Conservancy along the southern reaches of the Santa Clara River. This new parkway is described on pages 2.0-13 and 2.0-14 of the Draft EIR. The acquisition of land along a 12-mile stretch of the river is proposed to facilitate restoration and enhancement of natural river habitat along this portion of the river. The extension of Kimball Road through the land recently purchased by the Nature Conservancy would be inconsistent with this important regional conservation effort, as would the construction of another bridge across this portion of the river, which contains sensitive natural habitat. In addition, the planned alignment would require extensive filling of the existing mine pits to allow the road to cross. Further, this road extension would impact prime agricultural land located in the Oxnard-Camarillo-Ventura Greenbelt to the north of El Rio and Nyeland Acres. Thus, the marginal traffic benefits of this road extension bridge hardly justify its high monetary and significant environmental impacts. In addition, the feasibility of obtaining the required permits and approvals to build the road and bridge are questionable.

Extension of Kimball Road would not be consistent with the applicable policy of the Ventura Circulation Element which states that the future roadways shown on the Ventura Circulation Element Map are not intended to be extended until development which is consistent with the Comprehensive Plan occurs, or until they become necessary to accommodate traffic. The Ventura Comprehensive Plan does not allow development around the Kimball Road extension and the information presented above demonstrates that the extension of Kimball Road is neither justified or necessary to maintain acceptable traffic conditions in Ventura, Oxnard or the surrounding areas. This roadway extension has never been a component of the Oxnard General Plan Circulation Element. No significant impacts will result, therefore, from adoption of a specific plan for the RiverPark Specific Plan Area that precludes the extension of Kimball Road.

VEN-35

The Specific Plan does not provide for the reservation of right-of-way to allow for the connection of Kimball Road. As discussed above in the response to comment VEN-34, the extension of Kimball Road has not been a feature of the Oxnard General Plan Circulation Element and the traffic analysis shows that

this future road extension is not needed to maintain an acceptable level of service on the roadway network in the area.

VEN-36

Please see Table 4.7-10 (b) on page 4.7-34 which shows the mitigation measure would be effective in mitigating project traffic impacts at this location.

VEN-37

The Oxnard Town Center Specific Plan is analyzed as the No Project/Existing Approvals Alternative. This alternative is analyzed in detail in Appendix B of the project traffic study in Appendix 4.8 in Volume III of the Draft EIR. The adopted Specific Plan, including the land use and its traffic generation, was the subject of a previous EIR (the Oxnard Town Center EIR). A comparison of the traffic that would be generated by the Oxnard Town Center Specific Plan with the traffic that would be generated by the RiverPark Specific Plan is provided on pages 5.0-11 and 5.0-12 of the Alternatives section of the EIR. As discussed in this section, the RiverPark Specific Plan would generate approximately 14 percent fewer trips on roadways outside the Specific Plan Area than the currently adopted Oxnard Town Center Specific Plan.

VEN-38

The Draft EIR does contain discussion of the existing County Reclamation Plan where it is appropriate. This existing reclamation plan is discussed in Section 2.0, Environmental Setting, on pages 2.0-8 and 2.0-9 of the Draft EIR. The existing reclamation plan is also addressed in the No Project/Existing Conditions Alternative, on pages 5.0-7 through 5.0-16 of the Draft EIR. This discussion in the alternatives section of the Draft EIR provides comparative analysis of the existing reclamation plan with the project as proposed.

As the existing reclamation plan is not part of the proposed project, it would not be appropriate to address this existing plan in Section 4.5, Water Resources, which evaluates the impacts of the RiverPark Project, a component of which is a new reclamation plan.

VEN-39

Although UWCD's proposed use of the reclaimed mine pits does provide a benefit to the project water balance, it is not essential to insuring that the project does not significantly impact water quantity. Under existing conditions, the largest component of the water balance on an average basis is the agricultural usage (see Table 4.5-3 in the Draft EIR). Implementation of the project will eliminate this use and will result, on average, in a positive water balance. This is also reflected in Table 4.5-21, where, if the average UWCD diversion (7,022 AFY) is subtracted from the reconfigured gravel pits water balance column, the net result is still a positive water balance. Under existing conditions there is a negative water balance.

Section 4.5, Water Resources, in the Draft EIR does contain separate analysis of the proposed use of the pits for groundwater storage and recharge by UWCD. With regard to water quality, separate analysis of the impacts of the use of the pits by UWCD is provided. The use of the pits by UWCD does not affect the water quality impacts of the proposed development in RiverPark.

VEN-40

UWCD's proposed use of the reclaimed mine pits was examined at a programmatic level only as detailed information regarding this use has not been developed at this time by the UWCD. As described in the Draft EIR Project Description Section on page 3.0-16, the proposed RiverPark Specific Plan would allow the existing mine pits to be used by UWCD for the storage and recharge of water diverted from the Santa Clara River. The potential environmental effects of this proposed use is analyzed in the Draft EIR. It is noted in the Draft EIR that UWCD has not designed the facilities to convey water to the pits or defined other details associated with its proposed use of the pits. For this reason, further meaningful review of this proposed future use of the pits cannot be conducted at this time and would be speculative.

The proposed future use of the reclaimed mine pits by UWCD is not a "critical element" of the proposed project. Use of the mine pits is not essential to mitigation of potential project impacts (see the response to comment VEN-39 above), and, for this reason, further analysis of this use of the pits by UWCD as allowed by the proposed specific plan is not warranted or necessary. However, insofar as the UWCD project would be utilized to supplement existing potable water production facilities in the area, approvals and/or permits from the California Department of Health Services and the Regional Water Quality Control Board would be required at a minimum.

VEN-41

Should UWCD not use the reclaimed mine pits for water storage and recharge, there will be no active use of the pits. The proposed reclamation plan would be fully implemented, which would involve stabilizing the slopes of the pits and planting these slopes with native vegetation. A City Maintenance Assessment District is proposed to provide for the maintenance of the slopes of the pits and the water quality treatment system, which consists of a series of dry swales and lined detention basins. If UWCD uses the pits, responsibility for maintenance of the pits would be assumed by UWCD.

VEN-42

The GREAT Program is one of the water supply programs identified in the City of Oxnard Urban Water Management Plan. The GREAT Program is not the only additional source of water identified in the City's Urban Water Management Plan. While the GREAT Program is planned by the City to ultimately satisfy the future increase in demand for water in the City, the Urban Water Management Plan also identifies other water sources to meet the increased demands for water identified in the Plan. Should the GREAT Program not be developed as currently envisioned the City would purchase additional water above its current Fox Canyon Groundwater Management Agency allocation (for groundwater) and/or Calleguas Municipal Water District allocation (for surface water). Both of these options will incur cost penalties, but are viable options for the City identified in the Urban Water Management Plan. Based on the multiple sources of additional water identified in the City's Urban Water Management Plan, sufficient water supplies will be available to meet the demands of the RiverPark Project, consistent with the requirements of SB 221 and SB 610. A formal water supply assessment addressing all items and topics defined in SB 610 can be found in **Appendix A** of the Final EIR.

VEN-43

Please note that Appendix 5.0 of the Draft EIR contains information supporting the conclusion that the RiverPark A only and 25% Reduction Alternatives are not financially feasible. This information demonstrates that these alternatives are not just more expensive or less profitable, but rather would result in a negative return on investment, which makes these alternatives financially infeasible. As discussed in the response to the previous comment, the City's Urban Water Management Plan identifies multiple sources of additional water the City can feasibly develop or acquire to meet projected cumulative water demands, including the additional demands associated with the RiverPark Project.

VEN-44

Please see the responses to Comments 1-43 above. Responses have been provided to all comments and none of these responses include the identification of "significant new information" as defined Section 15088.5 of the CEQA *Guidelines* that would require recirculation of the EIR. All of the conclusions in the EIR are supported by the information in the EIR. In almost all cases, the information requested by the City of Ventura in comments 1-43 was already provided in the Draft EIR and its technical appendices. None of the conclusions reached in the Draft EIR have been changed as a result of the responses to Comments 1-43. Section 15088.5 of the CEQA *Guidelines* requires recirculation of an EIR when significant new information results in any of the following: (1) Identification of new significant impact that would result from the project or a mitigation measure; (2) Identification of a substantial increase in the severity of an impact that cannot be mitigated; or (3) Identification of a feasible alternative or mitigation measure considerably different from those previously analyzed that the project proponents decline to adopt. None of these circumstances have occurred as a result of the information included in the responses to Comments 1-43 above. Recirculation of the EIR is, therefore, not required.

VEN-45

As demonstrated by the responses to Comments 1-43 above, all of the conclusions in the Draft EIR are supported by substantial information and evidence included in the Draft EIR. Recirculation of the EIR is, therefore, not required.